

Company Name Walmart
Industry Agricultural, Apparel & ICT Products (Supply Chain only)
Overall Score 21.4 out of 100

Theme Score	Out of	For Theme
2.2	10	A. Governance and Policies
6.9	25	B. Embedding Respect and Human Rights Due Diligence
6.5	20	C. Remedies and Grievance Mechanisms
1.9	25	D. Performance: Company Human Rights Practices
3.8	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: In November 2018, the Company published a Statement on its website, where it states: 'Walmart respects human rights; our work is guided by our values: Service to the customer; Respect for the individual; Strive for excellence; Act with integrity'. It also adds 'Governments have the responsibility to protect and uphold human rights of their citizens. Walmart respects those human rights and complies with the laws of the countries in which we operate'. [Human Rights Statement (web), N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The Company states that 'our response to human rights issues is informed by international instruments, including, but not limited to, the United Nations Universal Declaration of Human Rights, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights'. However, the commitment is 'informed by', which is not considered a formal statement of commitment following CHRB wording criteria. [Human Rights Statement (web), N/A: corporate.walmart.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Company has a commitment to the ILO Core: The Company states in its Human Rights Statement: 'Our response to human rights issues is informed by international instruments including, but not limited to, the United Nations Universal Declaration of Human Rights, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>Guiding Principles on Business and Human Rights'. However, 'to be informed by' is not considered a formal statement of commitment according to CHRB wording criteria.</p> <p>The company provided additional evidence. However, it was not material to the assessment. [Human Rights Statement (web), N/A: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: It also indicates: 'We respect the basic rights of workers as those rights are defined under applicable law in the countries in which we operate and from which we source the products we sell. Those basic rights include freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of underage labor and the elimination of discrimination in respect to employment and occupation.' <p>Moreover: 'we recognize there are different views about freedom of association. Our view is, consistent with applicable law, that Walmart respects the rights of associates to join, for or not to join an employee association or trade union of their choice without interference'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'consistent with applicable law'.</p> <p>The company provided additional evidence. However, it was found to be not material for the assessment. [Human Rights Statement (web), N/A: corporate.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: As indicated below, it is not clear whether all ILO core areas are respected in all contexts and locations. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Not Met: Company explicitly list All four ILO for suppliers: The 'Standard for Suppliers' includes the following requirements: 'do not use involuntary, trafficked, or underage labor (...), Discrimination, harassment, and unfair treatment diminish the dignity of individuals and have no place in Walmart's business or in our suppliers' businesses'. Moreover, suppliers are asked to: 'Recognize freedom of association and collective bargaining. Respect the rights of workers to join an employee association or trade union, or refrain from doing so, without interference, in accordance with applicable law and practice'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with applicable law and practice'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Human Rights Statement (web), N/A: corporate.walmart.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect H&S of workers: Previous assessment used evidence from the 'Global Statement of Ethics', which has been replaced by the Code of Conduct, according to the website subsection 'Ethics and Compliance'. No evidence found in publicly available policy documents that the Company commits to respect the health and safety of workers. <p>The company references a Global Environmental, Health and Safety Policy. However, this policy is not available in the public domain. [Ethics & compliance (web), 07/07/2021: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The 'Standard for Suppliers' indicates: 'Walmart expects suppliers to take responsibility for the safety and wellbeing of the workers who produce products for Walmart. Provide a safe, clean, and healthy work environment as appropriate for your industry, geography, and workforce. This includes ensuring facilities are structurally sound, fit for purpose, compliant with electrical and fire safety laws and standards, and well maintained'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Ethics & compliance (web), 07/07/2021: corporate.walmart.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The 'Standard for Suppliers' indicates that the Company expects suppliers to 'Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable

Indicator Code	Indicator name	Score (out of 2)	Explanation
			agreements. Ensure workers understand these terms'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a maximum of 48 hours regular working week, and consensual overtime paid at a premium rate. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments Score 2 <ul style="list-style-type: none"> • Not Met: Respecting the right to water • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments : The 'Standard for Suppliers' indicates that the Company expects suppliers to: 'Provide access to clean and sanitary facilities and clean drinking water'. However, it is not clear the Company expects suppliers to respect the right to water beyond sanitary facilities and clean drinking water for workers. Finally, it is not clear suppliers are expected to obtain the FPIC. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect at least one of these rights Score 2 <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights: The company provided feedback referencing documents and statements referring to discrimination on the basis of sex and measures taken to mitigate discrimination. However, none of the statements or documents contain a clear policy commitment to women's rights. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not Met: Children's rights • Not Met: Migrant worker's rights: The company provided feedback referencing initiatives to support migrants. However, it provided no evidence towards a policy commitment for the rights of migrant workers. • Not Met: Expects suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Responsible mineral sourcing: The company provided feedback for this indicator. However, this was found not to be material for the assessment. • Met: Based on OECD Guidance: It indicates: 'We also engaged third party firms with specialized experience in various aspects of conflict minerals to assist Walmart in the development and implementation of our program, which includes due diligence activities consistent with the Organization for Economic Co-operation and Development (OECD) Guidelines'. [Conflict Minerals Policy (web), N/A: corporate.walmart.com] • Not Met: Requires suppliers to commit to responsible mineral sourcing: It also states: 'Walmart expects its product suppliers to actively support Walmart's conflict minerals compliance efforts by: adopting responsible mineral sourcing policies in dealing with their supply chains that are consistent with this policy and the OECD guidance, supplying products to Walmart that do not contain 3TG minerals that have been sourced under circumstances that contribute to or support human rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			violations in the DRC, and providing evidence to support their representations as to the conflict minerals status of their products upon request'. However, it is not clear if the requirement to follow OECD Guidance for suppliers applies beyond DRC, to cover other conflict affected and high risk countries. [Conflict Minerals Policy (web), N/A: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect at least one of these rights Score 2 <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: The Company commits to remedy • Met: Company expect suppliers to make this commitment: According to the section 'Source Responsibly' of its Code of Conduct, the Company indicates: 'Suppliers should disclose factories as required by Walmart, complete and turn in audits on time, and work with their facilities to remediate all non-compliances identified during audits'. The company's Standards for Suppliers (Product Suppliers) requires suppliers to 'remediate issues where they exist'. [Code of Conduct, N/A: walmartethics.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The company provided feedback for this indicator. However, the additional evidence given does not include a policy commitment as required by this indicator. It was therefore not material for the assessment. • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company indicates, in its website section Human Rights: 'our Chief Sustainability Officer and Executive Vice President of Corporate Affairs provides regular updates about our ESG initiatives, including those related to our salient human rights issues, to the Nominating and Governance Committee [NGC] of the Walmart Board of Directors'. The Human Rights Statement states: 'The Walmart Board of Directors approved this statement on November 2, 2018. The Board reviews our progress on human rights, at minimum, annually'. The Proxy statement indicates that this NGC 'reviews and advises management on environmental, social, and community initiatives, as well as legislative affairs and public policy engagement'. [Human rights (web), 07/07/2021: corporate.walmart.com] & [Human Rights Statement (web), N/A: corporate.walmart.com] • Met: Describe HR expertise of Board member: According to information provided on the company's website, several board members have experience in diversity and equality. [Board of Directors (web), N/A: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The president and CEO of the company referred to human rights commitments among other things in the 2020 Regeneration Speech. [2020 Regeneration Speech, 2020: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The Human Rights Statement also states: 'The Walmart Board of Directors approved this statement on November 2, 2018. The Board reviews our progress on human rights, at minimum, annually'. In its Human Rights Brief it states 'Chief Sustainability Officer and Executive Vice President of Corporate Affairs provides regular updates about our ESG initiatives, including those related to our salient human rights issues, to the Nominating and Governance Committee of the Walmart Board of Directors.' <p>However, although it indicates that the Committee reports on ESG issues to the Board and the frequency it occurs, it is not clear the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes specifically.</p> <p>The company provided feedback for this indicator, however, it was not material for the assessment. [Human Rights Statement (web), N/A: corporate.walmart.com] & [Human rights (web), 07/07/2021: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: Examples/trends re HR discussion in the last reporting period: The company provided feedback for this indicator. However, it is unclear whether the evidence provided refers to discussions that take place at board level. Therefore, the feedback is not material for the assessment of this indicator. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions: The company provided feedback for this indicator, however, it was not material to the assessment.
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A1.2. • Met: Senior responsibility for HR implementation and decision making: The company explains its human rights governance: 'A cross-functional Human Rights Working Group (HRWG) supports Walmart teams in advancing respect for human rights through our business. (...) The working group reports to the ESG Steering Committee, which is a management committee composed of leaders from various Walmart teams that reviews ESG issues and priorities at Walmart. The ESG team, as part of Global Responsibility, coordinates the HRWG. In addition, our Chief Sustainability Officer and Executive Vice President of Corporate Affairs provides regular updates about our ESG initiatives, including those related to our salient human rights issues, to the Nominating and Governance Committee of the Walmart Board of Directors'. [Human rights (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: As indicated above, 'A cross-functional Human Rights Working Group (HRWG) supports Walmart teams in advancing respect for human rights through our business. The working group includes representatives from functions such as Ethics & Compliance; Global People; Labor Relations; Responsible Sourcing; Culture, Diversity & Inclusion; Global Responsibility; Government Affairs; Communications; and Legal'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Day-to-day resources and expertise allocation in own ops: Although the Company describes the HRWG, including expertise/departments involved no further details found in relation to resources allocated (i.e people) The company provided further comments for this indicator, however, the evidence given did not include information on how expertise and human resources are allocated. [Human rights (web), 07/07/2021: corporate.walmart.com] • Not Met: Resources and expertise allocation in the supply chain: The company provided further comments for this indicator, however, the evidence given did not include information on how expertise and human resources are allocated.
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company disclose its risk factors, principal risks include operational risks (included in the enterprise risk management). It indicates: 'risks associated with our suppliers could materially adversely affect our financial performance: (...) We expect our suppliers to comply with applicable laws, including labor, safety, (...), and to otherwise to meet our required suppliers standards of conduct. Our ability to find qualified suppliers who uphold our standards, and to access products in a timely and efficient manner and in the large volumes we may demand, is a significant challenge, especially with respect to suppliers located and goods sourced outside the U.S.'. [2021 Annual Report, 02/06/2021: s2.q4cdn.com] • Not Met: Provides an example: The company provided feedback for this indicator. However, the evidence was not material for the assessment. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2. • Met: Communicates its policy to all workers in own operations: Regarding its Code of Conduct, the Company indicates: 'Review our Code and understand how it and our policies apply to your job. Associates must complete any required training on our Code and acknowledge that they have read and understand it'. The webpage section Human Rights notes: 'Walmart associates receive ethics training during onboarding and regularly thereafter. In FY2021, more than 942,000 associates received ethics training. An updated global training module and awareness campaigns are launching in 2021 to support our new Code of Conduct'. The Code contains the Company's human rights policies. [Code of Conduct, N/A: walmartethics.com] & [Human rights (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2. • Not Met: Steps to communicate policy commitments to supply chain [Code of Conduct, N/A: walmartethics.com] & [Human rights (web), 07/07/2021: corporate.walmart.com] • Met: Requires suppliers to communicate policy requirements: The Company indicates: 'All suppliers of goods for resale and for our own use are subject to our Standards for Suppliers. Suppliers are expected to communicate these standards throughout their supply chain. We include the Standards for Suppliers in supplier agreements, and post them for suppliers in seven languages'. The Standards for Suppliers document indicates: 'Suppliers are responsible for compliance with these Standards throughout their business and throughout the process of providing products to Walmart. This includes responsibility for the conduct of any suppliers, subcontractors, and agents they use as part of their Walmart business'. It includes specific sections related to: forced labour, underage labour, working hours, freedom of association and health and safety. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: It indicates: 'We include the Standards for Suppliers in supplier agreements'. As indicated above, it includes specific sections related to: forced labour, underage labour, working hours, freedom of association and health and safety. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Not Met: Company requires suppliers to cascade down to their suppliers: The company states that 'Suppliers are responsible for compliance with these Standards throughout their business and throughout the process of providing products to Walmart. This includes responsibility for the conduct of any suppliers, subcontractors, and agents they use as part of their Walmart business.' However, it is not clear whether this requires contractual/binding arrangements in its suppliers' supply chain. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Met: How workers are trained on HR policy commitments: Regarding its Code of Conduct, the Company indicates: 'Review our Code and understand how it and our policies apply to your job. Associates must complete any required training on our Code and acknowledge that they have read and understand it'. The webpage section Human Rights notes: 'Walmart associates receive ethics training during onboarding and regularly thereafter. In FY2021, more than 942,000 associates received ethics training. An updated global training module and awareness campaigns are launching in 2021 to support our new Code of Conduct'. The Code contains the Company's human rights policies. [Code of Conduct, N/A: walmartethics.com] & [Human rights (web), 07/07/2021: corporate.walmart.com] • Met: Trains relevant managers including procurement: The Company indicates: 'Merchants and sourcing associates also participate in training to understand how their decisions can potentially influence supply chain conditions, and what they can do to reinforce positive facility working practices with suppliers. They receive new associate onboarding from Responsible Sourcing, and participate in workshops and educational sessions, which typically include information on forced labor, health and safety, and category-specific training'. [Responsible Sourcing (web), N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: It also notes: 'The Responsible Sourcing Academy provides suppliers with access to training resources, best practice guidance, and educational materials developed by third parties and by Walmart. The Academy covers topics such as audit guidance – including the Global Compliance Guidance Tool – forced labor, health and safety, and supply chain controls. Many of these resources are offered in multiple languages. Responsible Sourcing associates conduct training and onboarding sessions with suppliers around the world'. [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: Regarding supplier monitoring, the Company indicates: 'Our monitoring program begins with our requirement that suppliers disclose to Walmart any facilities they are using to produce private and exclusive brand merchandise, goods imported by Walmart and items for our own use that carry the Walmart brand (such as shopping bags). In some markets, and based on risk, we require additional facilities to be disclosed, and this requirement extends to goods not for resale. Consistent with our Disclosure Policy & Guidance and Audit and Assessment Policy & Guidance documents, we rely on third-party auditing programs to monitor suppliers' social compliance at these facilities. (...)we require suppliers to provide audits from our suppliers' facilities based on factors including the risk level of the country in which the facility is located or any prior audit results from the facility. (...) If a facility is in scope for an audit, a third-party audit is conducted to evaluate and monitor social compliance'. However, it is not clear how the Company monitors the implementation of its human rights policy commitments across its own operations.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The company provided feedback for this indicator, referencing the Human Rights Working Group that is in charge of reviewing ESG issues and priorities. However, it is unclear how this group or other actors monitors or audits the compliance with human rights policy commitments. [People in supply chains (web), 07/07/2021: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: The Company indicates: 'Walmart assessed more than 14,000 third-party audit reports in FY2021'. However, it is unclear what percent of the supply chain was monitored. [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: Describe how workers are involved in monitoring: It indicates: 'In addition to monitoring suppliers' facilities through audits, Walmart investigates certain alleged violations of our Standards for Suppliers. These allegations were the results of audits, internal referrals and worker grievance mechanisms such as the Walmart Ethics hotline. Each case is reviewed, and follow-up may include worker interviews and onsite visits'. However, it is not clear how company workers are involved in the monitoring/auditing process. <p>The company provided feedback for this indicator, however, it was found not material for the assessment. [Responsible Sourcing (web), N/A: corporate.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Met: Describes corrective action process: It indicates: 'Facilities are assigned color ratings based on their compliance and risk levels. These ratings may come from audits or investigations. Green: Highest level of compliance; Yellow: Minimal issues to be addressed; Orange: More significant issues that must be remediated; Red: Serious issues that ordinarily lead to the facility no longer being authorized to produce products for Walmart. Suppliers may also be given consequences for substantiated non-compliances. Suppliers may be assigned a "strike" where they are directly responsible for non-compliant activities (i.e., action on their part as opposed to on the part of one of their facilities) and for certain serious violations by their facilities. Ordinarily three "strikes" within a two-year period will lead to the termination of a relationship with Walmart. Walmart may also choose to sever its relationship with a supplier based on a single instance or event, as circumstances warrant. (...)Whether resulting from audits or cases, when higher-risk findings that could lead to a red rating (for a facility) or a strike (for a supplier) are identified, the compliance teams work with the relevant merchant teams to communicate the results, any business consequences and/or remediation expectations to the supplier'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: Disclose findings and number of corrective action: The Company indicates that 'In FY2021, 26 facilities received a red rating'. Also, 'in FY2021, nearly 30% of orange-rated facilities were remediated to either yellow or green assessments'. However, it is not clear number of corrective action processes as a result of the monitoring. Moreover, no evidence found of the findings of the monitoring process. <p>The company provided evidence citing the Audit Policy & Assessment Guidance that says 'All suppliers using a facility are expected to work with that facility to remediate all non-compliances identified in the audit report in the manner specified by the audit program chosen'. However, this only indicates an expectation that all issues must be addressed, it does not equate to the disclosure of actual number. [People in supply chains (web), 07/07/2021: corporate.walmart.com] & [Audit and Assessment Policy and Guidance 2021, 11/2021: one.walmart.com]</p>
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company divides countries where suppliers are based into three categories: lower risk, medium risk, and higher risk. The Company has also a color rating system to assess compliance: green being the highest level of compliance; yellow, with minimal issues addressed; orange, more significant issues and red where serious issues are found. 'New facilities located in Category 1 or 2 countries that produce Direct Import Merchandise (product where Walmart will serve as the importer of record) must obtain a social audit and receive a Green, Yellow, or Orange color rating. All new facilities in Category 3 countries must obtain a social audit and receive a Green or Yellow color rating'. Social Compliance audits follow the color coding system. Therefore, there's a minimum criteria to fulfill for new facilities based on country and compliance level. [Audit and Assessment Policy & Guidance, 11/2021: one.walmart.com] • Met: HR affects on-going supplier relationships: It indicates: 'Walmart assesses the findings in each facility audit report submitted to Walmart against our Standards for Suppliers. Non-compliances and failure to remediate may result in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>consequences, up to and including termination of the supplier's business relationship with Walmart and/or a facility's ability to produce goods for sale at Walmart'. The Standards for Suppliers contains the Company's human rights expectations. [Supplier Expectations Compliance Areas (web), N/A: corporate.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company discloses the following: 'For certain risks, supply chain monitoring and supplier engagement can only go so far. Long-term social sustainability in complex, global supply chains requires whole-system transformation and collective action of suppliers, NGOs, governments, retailers and others. Walmart has committed to work with others to address potential risks to the dignity of workers in a minimum of 10 retail supply chains by 2025; so far, we have focused on five supply chain initiatives: • Apparel in Bangladesh • Produce in the U.S. and Mexico • Shrimp in Thailand • Tuna processed in Thailand • Electronics sourced for the U.S. retail market supply chain'. [2019 ESG report, 8/5/2019: corporate.walmart.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: In its 2021 ESG Report Summary, the Company discloses its stakeholders. It includes: associates [workers], suppliers and communities. Moreover, in its webpage section People in supply chains, it indicates: 'In addition to monitoring suppliers' facilities through audits, Walmart investigates certain alleged violations of our Standards for Suppliers. These allegations were the results of audits, internal referrals and worker grievance mechanisms such as the Walmart Ethics hotline. Each case is reviewed, and follow-up may include worker interviews and onsite visits'. However, it is not clear how it has identified affected stakeholders. Although it indicates it interviews suppliers' workers, it is not clear it has taken place in the last two years. [2021 ESG Report Summary, 2021: corporate.walmart.com] & [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The Human Rights Statement indicates: 'We identify our salient human rights priorities based on relevance to our company purpose, key categories and markets; the scale and severity of the potential human rights risk; and Walmart's ability to make a difference. Our response to human rights issues is informed by international instruments including, but not limited to, the United Nations Universal Declaration of Human Rights, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. We have also taken into consideration input from relevant internal and external stakeholders and experts'. However, no further information found describing if the Company is carrying out (or has carried out) a process to identify its human rights risks and impacts. <p>The company provided feedback for this indicator referencing some documents and information. However, the evidence provided was not material for the assessment of this indicator. [Human Rights Statement (web), N/A: corporate.walmart.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Identifying risks through relevant business relationships: The webpage section People in Supply Chain indicates: ‘We employ a risk-based approach to monitor compliance with our Standards for Suppliers, focusing on areas that pose the greatest potential risks to worker dignity. (...) We do not wait for allegations of misconduct to audit. Instead, as set out in our Audit and Assessment Policy and Guidance, we require suppliers to provide audits from our suppliers’ facilities based on factors including the risk level of the country in which the facility is located or any prior audit results from the facility. Countries are assigned risk levels based on World Bank governance indicators. Country risk level helps us decide what type of due diligence may be needed before we permit our suppliers to begin producing product for Walmart. Facilities in lower-risk countries are typically subject to audits on a less frequent basis—but may be reaudited more frequently if prior results disclosed higher-risk findings—while facilities in countries that fall into medium and higher levels of risk are typically subject to regular audits, regardless of the outcome of earlier audits of the same facilities. If a facility is in scope for an audit, a third-party audit is conducted to evaluate and monitor social compliance’. However, evidence seems to refer to compliance monitoring rather than due diligence carried out to proactively determine which are the human right issues it faces as a company taking into consideration social, economic, geographical and/or other factors. Even if individual suppliers are assessed, this datapoint looks for evidence of how the Company is aware of what are the relevant human rights issues to consider. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As it is mentioned above, the Human Rights Statement states ‘We have also taken into consideration input from relevant internal and external stakeholders and experts’. No further details found in relation to expert and stakeholder consultation for ongoing due diligence process (identification of potential human rights risks and impacts) [Human Rights Statement (web), N/A: corporate.walmart.com] & [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates in its Human Rights Statement the following: ‘We identify our salient human rights priorities based on relevance to our company purpose, key categories and markets; the scale and severity of the potential human rights risk; and Walmart’s ability to make a difference. [...] We have also taken into consideration input from relevant internal and external stakeholders and experts’. See further description in B.2.1, including country considerations. However, no further information found describing the assessment process. <p>The company provided further comments for this indicator. However, the evidence did not include information on the processes used to determine the level of actual exposure to those risks. [Human rights (web), 07/07/2021: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: How process applies to supply chain: The webpage section People in Supply Chain indicates: ‘We employ a risk-based approach to monitor compliance with our Standards for Suppliers, focusing on areas that pose the greatest potential risks to worker dignity. (...) we require suppliers to provide audits from our suppliers’ facilities based on factors including the risk level of the country in which the facility is located or any prior audit results from the facility. Countries are assigned risk levels based on World Bank governance indicators. Country risk level helps us decide what type of due diligence may be needed before we permit our suppliers to begin producing product for Walmart. Facilities in lower-risk countries are typically subject to audits on a less frequent basis—but may be reaudited more frequently if prior results disclosed higher-risk findings—while facilities in countries that fall into medium and higher levels of risk are typically subject to regular audits, regardless of the outcome of earlier audits of the same facilities. If a facility is in scope for an audit, a third-party audit is conducted to evaluate and monitor social compliance. (...) Facilities are assigned color ratings based on their compliance and risk levels’. However, this seem to be part of its compliance monitoring system. Although the Company describes hoy country risk level is taking into account in determining risks, evidence focuses in individual supplier risk. This indicator looks for evidence of how the company assesses the saliency of specific human rights risks and impacts across its supply chain, rather than assessing individual supplier particular risks.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The company provided further comments for this indicator. However, the evidence did not include information on the processes used to determine the level of actual exposure to those risks. [People in supply chains (web), 07/07/2021: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of the results of HR assessment: The Company discloses the following salient human rights issues in its ESG report: 'Treating workers with respect; Promoting a safe & healthy work environment; Providing a fair & inclusive work environment; Combating forced & underage labor'. Each of these contains key aspects, which include pay and working hours, freedom of association and collective bargaining, debt bondage, etc. [2019 ESG report, 8/5/2019: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: The company provided comments for this indicator, however, these were found not material for the assessment. • Not Met: Description of how global system applies to supply chain: The webpage section People in Supply Chain indicates: 'certain non-compliance with our standards can result in consequences up to and including termination of a supplier's relationship with Walmart and our subsidiaries and/or a supplier's ability to use a particular facility for Walmart production. Whether resulting from audits or cases, when higher-risk findings that could lead to a red rating (for a facility) or a strike (for a supplier) are identified, the compliance teams work with the relevant merchant teams to communicate the results, any business consequences and/or remediation expectations to the supplier. Moreover, the webpage section Human Rights discloses that 'Walmart and Walmart Foundation support programs and tools that engage workers to raise awareness and strengthen worker protections in supply chains. For instance, Walmart partnered with Issara Institute to engage directly with workers with the purpose to drive remediation. Issara Institute operates a multilingual migrant worker hotline and oversees remediation of identified issues in facilities'. However, no description found of its global system to prevent, mitigate or remediate its salient human rights issues. The current evidence seems to put the focus on monitoring compliance, assessed in indicator B.1.6. [Human rights (web), 07/07/2021: corporate.walmart.com] & [People (web), N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Example of actions decided on at least 1 salient HR issues: The Company discloses different recent examples of Walmart & Walmart Foundation initiatives to combat forced labor & promote responsible recruitment: 'In FY2021, the Walmart Foundation made an investment in CIERTO, a non-profit international Farm Labor Contractor, to build capacity around the responsible recruitment of H-2A migrant workers through the Mexico/U.S. corridor to U.S. farms and to support implementation of the "Employer Pays Principle" under which the costs of recruitment should be borne not by the worker but by the employer'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: It indicates: 'Beyond foundational compliance, Walmart and the Walmart Foundation are working to address key issues in strategic supply chains by: Conducting due diligence, including funding research into the prevalence of social concerns in industry supply chains and/or regions and tracking progress toward improvement (e.g., the Walmart Foundation funded the first comprehensive study documenting the prevalence of forced labor and exploitation of fishermen on Thai fishing vessels in 2016, led by International Justice Mission)'. However, no further description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: It indicates: 'Walmart makes several grievance mechanisms available to solicit, assess and address the concerns of our stakeholders, including our own associates, workers in the supply chain, and groups interested in raising concerns on individuals' behalf. These include the following: Global helpline (...), Global email address (...), WalmartEthics.com'. [Human rights (web), 07/07/2021: corporate.walmart.com] Score 2 • Met: Channel is available in all appropriate languages and workers aware: It notes, the WalmartEthics.com 'is available in 13 languages and is globally accessible'. Also, 'We train our associates to be able to recognize and speak up about retaliation and other issues. Walmart associates receive ethics training during onboarding and regularly thereafter'. [Human rights (web), 07/07/2021: corporate.walmart.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Standard for Supplier notes it should: 'Provide a mechanism for workers to report concerns to management, to you as the supplier, and to third parties. These mechanisms should allow for anonymity and prohibit retaliation for reporting in good faith. Walmart makes its Ethics & Compliance reporting channels available to workers who have concerns about suppliers and facilities that make product for Walmart. Suppliers of Walmart-branded product and product where Walmart will be the importer of record are required to distribute Walmart posters throughout their supply chain to help make workers aware of Walmart's expectations and the availability of those reporting channels'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Met: Expect Suppliers to convey expectation to their own suppliers: See above. In addition, it indicates that 'Suppliers are responsible for compliance with these Standards throughout their business and throughout the process of providing products to Walmart. This includes responsibility for the conduct of any suppliers, subcontractors, and agents they use as part of their Walmart business'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The webpage section Human Rights indicates: 'Walmart makes several grievance mechanisms available to solicit, assess and address the concerns of our stakeholders, including (...) groups interested in raising concerns on individuals' behalf. These include the following: Global helpline (...), Global email address (...), WalmartEthics.com'. [Human rights (web), 07/07/2021: corporate.walmart.com] Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness: It notes, the WalmartEthics.com 'is available in 13 languages and is globally accessible'. The Global Helpline consists of 'global and local phone numbers that anyone can use to ask questions and report concerns related to Walmart's business, 24 hours a day, seven days a week. The helpline is equipped to handle most local languages spoken in each of the retail markets where we operate.' However, it is not clear how all affected external stakeholders at its own operations are made aware of it. The company provided further information for this indicator. However, as it did not clarify how stakeholder awareness of the grievance mechanisms is ensured, it was not material for the assessment. [Human rights (web), 07/07/2021: corporate.walmart.com] • Met: Communities access mechanism direct or through suppliers: Although there are grievance mechanisms available to suppliers' employees, no evidence found on whether these are available for suppliers' external stakeholders. The company indicates in its Audit and Assessment Policy and Guidance that Responsible Sourcing Compliance receives allegations through several sources, including escalations from audit programs, the Ethics hotline and inbox, anonymous tips,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			internal business partners, media and NGO reports, and other sources.' Therefore, external stakeholders and communities can access the ethics hotline and helpline for concerns regarding suppliers. [Audit and Assessment Policy and Guidance 2021, 11/2021: one.walmart.com] <ul style="list-style-type: none"> • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: The Company indicates: 'Use the case number and password you receive from the Helpline or walmartethics.com to check your report's status or provide additional details. Ethics & Compliance will follow up with most concerns within 72 hours. (...)Ethics & Compliance will follow-up in a way that is most likely to be received by the reporter. If you provide an email address, we will respond through email. (...) If you have filed an anonymous report, periodically check-in online to look for updates to your case. (...) you may be contacted to assist with the investigation. If you are asked to participate, give honest and complete answers, and do not discuss the investigation with anyone while the investigation is ongoing. (...) If a problem is found, Ethics & Compliance will work with the business to resolve it. If necessary, disciplinary action will be taken against an associate. For reasons of confidentiality and respect for the individual we will not share details about the investigation, but you will be informed when the case is closed'. However, it is not clear the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. [Integrity Builds Trust (web), N/A: walmartethics.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states that 'We encourage stakeholders to raise concerns and report activities they suspect may contravene the values and positions we express in our policies and statements. We will not retaliate against any party for raising concerns in good faith. We train our associates to be able to recognize and speak up about retaliation and other issues'. [Human rights (web), 07/07/2021: corporate.walmart.com] • Met: Practical measures to prevent retaliation: It indicates: 'Concerns are treated as confidentially as possible, and if you choose, you may report your concern anonymously to the extent allowed by law'. Also, as indicated above, the Company has a commitment to non-retaliation and clarifies that 'we train our associates to be able to recognize and speak up about retaliation and other issues'. [Integrity Builds Trust (web), N/A: walmartethics.com] Score 2 <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: While the company indicates 'we will not retaliate against any party for raising concerns in good faith' this indicator is asking for more specific commitments. The company provided additional comments for this indicator, however, they were found to be not material for the assessment. • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Standards for Suppliers indicates suppliers should: 'Provide a mechanism for workers to report concerns to management, to you as the supplier, and to third parties. These mechanisms should allow for anonymity and prohibit retaliation for reporting in good faith'. However, it is not clear this provision extends to suppliers' external stakeholders. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]
C.6	Company involvement with state-	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions

Indicator Code	Indicator name	Score (out of 2)	Explanation
	based judicial and non-judicial grievance mechanisms		Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company states that: 'Walmart was a founding member of the Alliance for Bangladesh Worker Safety, which concluded its five-year mission at the end of 2018. The Alliance trained nearly 1.6 million factory employees on basic safety and provided more than 1.5 million workers in 1,000 factories access to a helpline to anonymously report safety or other job-related concerns. Approximately 93% of total remediation items across Alliance-affiliated factories were complete—including 90% of high-priority remediation items. Although the Alliance's work concluded, we continue to prioritize safety in Bangladesh, including through Nirapon, an organization focused on monitoring ongoing safety compliance and maintaining the progress made through the Alliance and other safety initiatives'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact: Previous assessment was based on the webpage section "Our Commitment to the Workers of Bangladesh", which no longer seems to be available. • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company indicates: 'In FY2021, 843 cases were managed related to more serious allegations of non-compliances with our Standards for Suppliers'. 156 were related to voluntary labor, 111 employment practices and 66 working conditions. However, it is not clear the outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: How lessons from mechanism improve management system Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Standards for Suppliers requires suppliers to: 'Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly'. The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.2	Aligning purchasing decisions with human rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The company indicates 'Our Responsible Sourcing Business Enablement teams work with buyers and sourcing hubs to help integrate responsible sourcing practices. From merchant strategies to selecting suppliers, they're engaged in ensuring responsible buying practices at every step. Associates often participate in merchant and supplier meetings to help establish expectations up front. Merchants and sourcing associates also participate in training to understand how their decisions can potentially influence supply chain conditions, and what they can do to reinforce positive facility working practices with suppliers. They receive new associate onboarding from Responsible Sourcing, and participate in workshops and educational sessions, which typically include information on forced labor, health and safety, and category-specific training.' [Responsible Sourcing (web), N/A: corporate.walmart.com] • Met: Practices adopted to pay suppliers in line with agreed timeframes: Additionally, the company states it complies with agreed timelines for payment and offers supply chain financing to facilitate early payment for suppliers through the C2FO initiative. [Early Payment Program, N/A: corporate.walmart.com] • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Examples of how it assessed, addressed and change purchasing practices: The company cites its efforts to improve opportunities for minority-owned suppliers as 'In FY2022, we enhanced two existing supplier programs to provide diverse-owned businesses quicker access to capital and increased opportunities to connect with our merchants. In April 2021, we partnered with C2FO to expand on our existing early payment program to help diverse- and minority-owned suppliers increase their cash flow by accelerating their receipt of invoice payments from Walmart. The program enables these suppliers to hand-select invoices to request early payments on at significantly reduced rates. This gives these suppliers the ability to receive paid invoices within 48 hours of submission.' [Accelerating Our Commitment to Diverse and Minority Suppliers, 28/04/2021: corporate.walmart.com]
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): As a Board Member of the Seafood Task Force, the Company has participated in leading the Seafood Task Force, which 'has developed supply chain maps, established a system to track products across the supply chain, worked with government and industry stakeholders to improve regulation and codes of conduct, and championed fishery improvement projects'. However, this mapping is focused only on Seafood. The Company also has a disclosure policy and guidance showing how suppliers must disclose a facility to 'Responsible sourcing' department. However, 'Walmart may exempt farms from an applicable disclosure requirement'. It is not clear it identifies its suppliers, including direct and indirect suppliers. <p>The company provided comments for this indicator, however, they were found to be not material for the assessment. [2019 ESG report, 8/5/2019: corporate.walmart.com] & [Disclosure Policy and Guidance, 02/2021: one.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its agricultural supply chain including locations. [Disclosure Policy and Guidance, 02/2021: one.walmart.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Exclude involuntary labor—including underage (...)—from your operations, subcontractors' operations, and supply chain. (...) Confirm all workers are appropriately authorized to work. This includes verifying worker eligibility to work in the country and in the relevant job prior to employment'. However, no evidence found of child labour requirements, including verifying the age of workers recruited, and remediation programmes, within its contractual arrangements with its suppliers or supplier code of conduct. <p>The company provided additional comments on this indicator, however, they were found not material for the assessment [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on child labour: In the webpage section Human Rights, it notes that 'we have identified five supply chains where we believe Walmart can make a positive impact in promoting respecting human rights'. It includes combating underage labor in the shrimp and tuna supply chain in Thailand. However, no further evidence found of how the Company works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. <p>The company provided additional comments for this indicator, however, they were found to be not material for the assessment. [Human rights (web), 07/07/2021: corporate.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assesment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Recruit responsibly. Do not charge vulnerable workers recruitment or similar fees—even if the collection of such fees is allowed under local law. If such fees are charged, we expect you to repay them. (...) Hold your agents and any labor brokers and recruiters used in the recruitment process to the same standards'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Met: How working with suppliers on debt & fees: It indicates: 'In FY2021, the Walmart Foundation made an investment in CIERTO, a non-profit international Farm Labor Contractor, to build capacity around the responsible recruitment of H-2A migrant workers through the Mexico/U.S. corridor to U.S. farms and to support implementation of the "Employer Pays Principle" under which the costs of recruitment should be borne not by the worker but by the employer'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees: The company provided additional comments for this indicator, however, the information referenced could not be found in the public domain. [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: Analysis of trends in progress made
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Suppliers to pay workers in full and on time in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly'. However, the prohibition of illegal or excessive deductions from wages is not equivalent to requiring suppliers to pay workers in full. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with supply chain to pay workers regularly and on time: In the webpage section Human Rights, it notes that 'we have identified five supply chains where we believe Walmart can make a positive impact in promoting respecting human rights'. It includes combating forced labor in the shrimp and tuna supply chain in Thailand. However, no further description found of the work done with suppliers to ensure workers are paid regularly, in full and on time. The company provided additional comments for this indicator, however, they only refer to the general auditing scheme and do not include evidence for capacity building with suppliers in this particular area. [Human rights (web), 07/07/2021: corporate.walmart.com] Score 2 • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Allow workers freedom of movement. Do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement through debts owed to you, brokers, or other third parties, and allow workers to terminate employment on reasonable notice'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on free movement: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers to improve performance on this particular topic. The company provided additional comments for this indicator, however, it was found to be not material for the assessment. [Facility Posters __, N/A: corporate.walmart.com] Score 2 • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Recognize freedom of association and collective bargaining. Respect the rights of workers to join an employee association or trade union, or refrain from doing so, without interference, in accordance with applicable law and practice'. However, it is not clear whether the Company requires suppliers to respect those rights in all contexts, as it indicates in accordance with applicable law and practice'. In cases where the Company refers to local law, evidence is needed of equivalent worker bodies, parallel mechanisms, etc. Moreover, the Company is expected to prohibit intimidation, harassment, retaliation and violence against trade union members and trade union representatives. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Recruitment __: ihrb.org] • Not Met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers. The company provided additional comments for this indicator. However, they were found to not be material for the assessment. [Facility Posters __, N/A: corporate.walmart.com] Score 2 • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Walmart expects suppliers to take responsibility for the safety and wellbeing of the workers who produce products for Walmart. Provide a safe, clean, and healthy work environment as appropriate for your industry, geography, and workforce. This includes ensuring facilities are structurally sound, fit for purpose, compliant with electrical and fire safety laws and standards, and well maintained. Provide access to clean and sanitary facilities and clean drinking water. Implement appropriate procedures and safeguards to prevent accidents and injuries to workers. Establish proper maintenance, monitoring, and inspection routines, worker training and protection, and fire safety measures. Take appropriate steps to protect workers from exposure to harmful chemicals, infectious disease, and other similar risks. Observe restrictions on hazardous work for young workers'. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities rate for lasting reporting period • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Obtain the licenses, permits, certifications, registrations, and rights necessary to operate and to provide products to Walmart. Maintain these and comply with all conditions of issue'. However, no evidence found that it has supplier land requirements, including the requirements to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation in its supplier code of conduct. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on land issues: It indicates that 'CIMMYT works throughout the developing world to improve livelihoods and to foster more productive and sustainable maize and wheat farming. (...) From 2018 through 2020, with Walmart Foundation support, CIMMYT strengthened its work in southern Mexico to advance women's empowerment through crop diversification. CIMMYT worked with FPOs to provide women with technical services for these crops. It found that women participated more fully in trainings dealing with postharvest interventions than in trainings related to finance. Most of the women in the program did not own land titles, which was noted by CIMMYT as a deterrent in looking for financing. This barrier prevents women from scaling crop diversification that could increase their farm's sustainability and help unlock markets. The project showed the need for new approaches to building access to finance for women'. However, it is not clear it works with suppliers to improve their practices in relation to land use/ acquisition. No further evidence found. [Women in smallholder, 03/2021: cdn.corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on water stewardship in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Provide access to clean and sanitary facilities and clean drinking water'. However, this requirement only refers to the health and safety of workplaces. The company further requires suppliers to 'design and operate systems to properly manage wastewater, storm water, waste, air emissions, and recyclable materials.' However, it is not clear the company includes access to water and sanitation requirements in its contractual arrangements with its suppliers or in its supplier code of conduct. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as (...) women (...)'. Also, 'In addition to complying with all applicable laws, suppliers must not engage in or tolerate discrimination, harassment, and unfair treatment based on an (...) sex, pregnancy (...)'. However, no supplier requirement found, in its contractual arrangements or supplier code of conduct, where the Company indicates that suppliers should provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. The company provided comments for this indicator, however, these included no additional information. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on women's rights: The Company indicates that 'Since 2011, Walmart and the Walmart Foundation have shaped and participated in special initiatives to help empower women working in global supply chains around the world. Most recently, these initiatives include overcoming barriers to market access for women smallholder farmers through the Walmart Foundation Market Access program (...). Such efforts build on the insights and momentum from our five-year Women's Economic Empowerment (WEE) initiative, which ran from 2012 to 2017 and included Walmart U.S. sourcing \$20 billion from women-owned businesses as well as philanthropic support to train one million women on farms, in factories and in retail settings in emerging markets'. However, as indicated, it seems that it ended more than three years ago. It also states that: 'In 2019 the Walmart Foundation awarded a second grant to the Aspen Institute to support its ANDE program. This time, as part of the Partnership for Sustainable and Inclusive Small and Growing Business program, ANDE will build strong and inclusive agricultural entrepreneurial ecosystems in Mexico, Guatemala, El Salvador and Honduras. The work includes understanding the gender profile and gender inclusion performance of small and growing businesses and farmer producer organizations; and then using these insights to develop customized training, advice, and tools to help advance gender inclusion in these organizations and to track and measure change'. It is not clear, however, how it is actually helping women among the Company's suppliers to improve performance in relation to women's rights. [Dignity of Women (web), N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Standards for Suppliers requires suppliers to: 'Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly'. The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The company indicates 'Our Responsible Sourcing Business Enablement teams work with buyers and sourcing hubs to help integrate responsible sourcing practices. From merchant strategies to selecting suppliers, they're engaged in ensuring responsible buying practices at every step. Associates often participate in merchant and supplier meetings to help establish expectations up front. Merchants and sourcing associates also participate in training to understand how their decisions can potentially influence supply chain conditions, and what they can do to reinforce positive facility working practices with suppliers. They receive new associate onboarding from Responsible Sourcing, and participate in workshops and educational sessions, which typically include information on forced labor, health and safety, and category-specific training.' [Responsible Sourcing (web), N/A: corporate.walmart.com] • Met: Practices adopted to pay suppliers in line with agreed timeframes: Additionally, the company states it complies with agreed timelines for payment and offers supply chain financing to facilitate early payment for suppliers through the C2FO initiative. [Early Payment Program, N/A: corporate.walmart.com] • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Examples of how it assessed, addressed and change purchasing practices: The company cites its efforts to improve opportunities for minority-owned suppliers as 'In FY2022, we enhanced two existing supplier programs to provide diverse-owned businesses quicker access to capital and increased opportunities to connect with our merchants. In April 2021, we partnered with C2FO to expand on our existing early payment program to help diverse- and minority-owned suppliers increase their cash flow by accelerating their receipt of invoice payments from Walmart. The program enables these suppliers to hand-select invoices to request early payments on at significantly reduced rates. This gives these suppliers the ability to receive paid invoices within 48 hours of submission.' [Accelerating Our Commitment to Diverse and Minority Suppliers, 28/04/2021: corporate.walmart.com]
D.2.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company also has a disclosure policy and guidance showing how suppliers must disclose a facility to 'Responsible sourcing' department. However, it is not clear it identifies its suppliers, including direct and indirect suppliers. <p>The company provided additional comments for this indicator, however, they were found to be not material for the assessment. [Disclosure Policy and Guidance, 02/2021: one.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its apparel supply chain including locations. [Disclosure Policy and Guidance, 02/2021: one.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Exclude involuntary labor—including underage (...)—from your operations, subcontractors' operations, and supply chain. (...) Confirm all workers are appropriately authorized to work. This includes verifying worker eligibility to work in the country and in the relevant job prior to employment (...) Exclude involuntary labour - including underage labor'. However, no evidence found of child labour requirements, including verifying the age of workers recruited, and remediation programmes, within its contractual arrangements with its suppliers or supplier code of conduct. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on child labour: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers, such as training or remediation programs. [Facility Posters __, N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Recruit responsibly. Do not charge vulnerable workers recruitment or similar fees—even if the collection of such fees is allowed under local law. If such fees are charged, we expect you to repay them. (...) Hold your agents and any labor brokers and recruiters used in the recruitment process to the same standards'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Met: How working with suppliers on debt & fees: The Company explains its collaboration with the International Organization for Migration (IOM). 'Walmart engaged this group to better understand the scope and scale of migrant labor in Walmart's supply chains in Thailand and Malaysia. To help build the leadership capacity of suppliers' facilities and their recruiters on ethical recruitment and migrant worker protection, the project delivered training to increase awareness of responsible recruitment practices and effective actions to improve the recruitment process of migrant workers and decrease the risk of workers' exploitation. IOM has trained 100 facilities in Thailand and Malaysia on managing the risks of migrant worker exploitation and trained over 90 recruiters 205 on ethical recruitment in Indonesia, Nepal, Malaysia, Cambodia, Thailand, Bangladesh and Myanmar. As a result, participants gained the knowledge and skills to help improve protection of over 84,000 migrant workers'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly'. However, the prohibition of illegal or excessive wage deductions does not meet the requirement for suppliers to pay workers in full. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Allow workers freedom of movement. Do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement through debts owed to you, brokers, or other third parties, and allow workers to terminate employment on reasonable notice'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on free movement: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers to improve performance on this particular topic. [Facility Posters__, N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Recognize freedom of association and collective bargaining. Respect the rights of workers to join an employee association or trade union, or refrain from doing so, without interference, in accordance with applicable law and practice'. However, it is not clear whether the Company requires suppliers to respect those rights in all contexts, as it indicates in accordance with applicable law and practice'. In cases where the Company refers to local law, evidence is needed of equivalent worker bodies, parallel mechanisms, etc. Moreover, the Company is expected to prohibit intimidation, harassment, retaliation and violence against trade union members and trade union representatives. <p>The company provided additional comments for this indicator. However, they were found to be not material for the assessment. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters__, N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Walmart expects suppliers to take responsibility for the safety and wellbeing of the workers who produce products for Walmart. Provide a safe, clean, and healthy work environment as appropriate for your industry, geography, and workforce. This includes ensuring facilities are structurally sound, fit for purpose, compliant with electrical and fire safety laws and standards, and well maintained. Provide access to clean and sanitary facilities and clean drinking water. Implement appropriate procedures and safeguards to prevent accidents and injuries to workers. Establish proper maintenance, monitoring, and inspection routines, worker training and protection, and fire safety measures. Take appropriate steps to protect workers from exposure to harmful chemicals, infectious disease, and other similar risks. Observe restrictions on hazardous work for young workers'. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Fatalities for last reporting period • Not Met: Occupation disease rate for last reporting period Score 2 <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: It indicates: 'Walmart is a founding member (and on the steering committee) of LABS, an initiative comprising European and American brands that have come together to set international best practices for factory safety in the apparel and footwear industries. LABS is currently active in India and Vietnam. LABS works with engineering companies to develop country-specific standards for safety in factories. It also commissions audits around fire, electrical and structural risks and asks factories to develop supervised Corrective Action Plans to remediate problems and then assesses implementation of their plans. LABS also provides training for factory workers on safety, maintaining fire prevention systems, and use of the LABS helpline to report building safety concerns'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as (...) women (...)'. Also, 'In addition to complying with all applicable laws, suppliers must not engage in or tolerate discrimination, harassment, and unfair treatment based on an (...) sex, pregnancy (...)'. However, no supplier requirement found, in its contractual arrangements or supplier code of conduct, where the Company indicates that suppliers should provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. The company provided additional comments for this indicator. However, those were referring only to general commitments and requirements on women's rights but did not provide the specific contractual obligations this indicator is asking for. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Recruitment__ : ihrb.org] <ul style="list-style-type: none"> • Not Met: How working with suppliers on women's rights: It indicates: 'Since 2011, Walmart and the Walmart Foundation have shaped and participated in special initiatives to help empower women working in global supply chains around the world. Most recently, these initiatives include (...) supporting the empowerment of women in factories through the Empower@Work Collaborative (...). Such efforts build on the insights and momentum from our five-year Women's Economic Empowerment (WEE) initiative, which ran from 2012 to 2017 and included Walmart U.S. sourcing \$20 billion from women-owned businesses as well as philanthropic support to train one million women on farms, in factories and in retail settings in emerging markets'. However, no further explanation found on how it works with suppliers to improve their practices in relation to women's rights. Previous assessment used a source dated in 2018, out the three-year framework that the methodology requires. [Dignity of Women (web), N/A: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable agreements. Ensure workers understand these terms'. However, no evidence found, in its Supplier Code of Conduct or contractual arrangements, of supplier requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on working hours: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However the posters do not clarify what the law say in reference to working hours, and there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters__, N/A: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made

D.4 ICT Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: 'The Standards for Suppliers requires suppliers to: 'Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly'. The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The company indicates 'Our Responsible Sourcing Business Enablement teams work with buyers and sourcing hubs to help integrate responsible sourcing practices. From merchant strategies to selecting suppliers, they're engaged in ensuring responsible buying practices at every step. Associates often participate in merchant and supplier meetings to help establish expectations up front. Merchants and sourcing associates also participate in training to understand how their decisions can potentially influence supply chain conditions, and what they can do to reinforce positive facility working practices with suppliers. They receive new associate onboarding from Responsible Sourcing, and participate in workshops and educational sessions, which typically include information on forced labor, health and safety, and category-specific training.' [Responsible Sourcing (web), N/A: corporate.walmart.com] • Met: Practices adopted to pay suppliers in line with agreed timeframes: Additionally, the company states it complies with agreed timelines for payment and offers supply chain financing to facilitate early payment for suppliers through the C2FO initiative. [Early Payment Program, N/A: corporate.walmart.com] • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices: The company cites its efforts to improve opportunities for minority-owned suppliers as 'In FY2022, we enhanced two existing supplier programs to provide diverse-owned businesses quicker access to capital and increased opportunities to connect with our merchants. In April 2021, we partnered with C2FO to expand on our existing early payment program to help diverse- and minority-owned suppliers increase their cash flow by accelerating their receipt of invoice payments from Walmart. The program enables these suppliers to hand-select invoices to request early payments on at significantly reduced rates. This gives these suppliers the ability to receive paid invoices within 48 hours of submission.' [Accelerating Our Commitment to Diverse and Minority Suppliers, 28/04/2021: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company has a disclosure policy and guidance showing how suppliers must disclose a facility to 'Responsible sourcing' department. However, it is not clear it identifies its suppliers, including direct and indirect suppliers. <p>The company provided additional comments for this indicator, however, they were found to be not material for the assessment. [Disclosure Policy and Guidance, 02/2021: one.walmart.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its apparel supply chain including locations. [Disclosure Policy and Guidance, 02/2021: one.walmart.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Exclude involuntary labor—including underage (...)—from your operations, subcontractors' operations, and supply chain. (...) Confirm all workers are appropriately authorized to work. This includes verifying worker eligibility to work in the country and in the relevant job prior to employment'. However, no evidence found of child labour requirements, including verifying the age of workers recruited, and remediation programmes, within its contractual arrangements with its suppliers or supplier code of conduct. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on child labour: The Company indicates that with its electronics suppliers: 'Governments, industry organizations and NGOs, including the U.S. Department of Labor and Verité, have identified the electronics supply chains in China and Malaysia as posing potentially higher risks for forced and underage labor. To mitigate these potential risks, we are engaging all information, communication and technology suppliers for the Walmart U.S. and Sam's Club U.S. retail market supply chains and asking them to implement the RBA Code of Conduct. These suppliers have the option to become an RBA member (regular or full category) or implement the RBA Validated Assessment Program for each disclosed facility'. However, although it is collecting information from suppliers and giving the suppliers to option of becoming an RBA member, it is not clear how it works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Recruit responsibly. Do not charge vulnerable workers recruitment or similar fees—even if the collection of such fees is allowed under local law. If such fees are charged, we expect you to repay them. (...) Hold your agents and any labor brokers and recruiters used in the recruitment process to the same standards'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: The Company explains its collaboration with the International Organization for Migration (IOM). 'Walmart engaged this group to better understand the scope and scale of migrant labor in Walmart's supply chains in Thailand and Malaysia. To help build the leadership capacity of suppliers' facilities and their recruiters on ethical recruitment and migrant worker protection, the project delivered training to increase awareness of responsible recruitment practices and effective actions to improve the recruitment process of migrant workers and decrease the risk of workers' exploitation. IOM has trained 100 facilities in Thailand and Malaysia on managing the risks of migrant worker exploitation and trained over 90 recruiters 205 on ethical recruitment in Indonesia, Nepal, Malaysia, Cambodia, Thailand, Bangladesh and Myanmar. As a result, participants gained the knowledge and skills to help improve protection of over 84,000 migrant workers'. In addition, 'The RBA-FDTN is a supporting organization of the RBA which has a leading social compliance standard designed to address forced labor risks across global supply chains. The Walmart Foundation's FY2021 grant will help diversify and strengthen the market for ethical recruitment by incentivizing private recruitment agencies serving different industries towards becoming an ethical recruiter through the Responsible Recruitment Program and by piloting an innovative economic model that incentivizes employers to participate in responsible recruiting'. [People in supply chains (web), 07/07/2021: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees: The company provided additional comments for this indicator, however, the information referenced could not be found in the public domain. • Not Met: Analysis of trends in progress made
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly'. However, no further supplier requirement to pay workers on time found. [Responsible Sourcing (web), N/A: corporate.walmart.com] & [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] • Not Met: How working with supply chain to pay workers regularly and on time: The company provided feedback for this indicator, however, it contained no new information and was found to be not material for the assessment. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Allow workers freedom of movement. Do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement through debts owed to you, brokers, or other third parties, and allow workers to terminate employment on reasonable notice'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on free movement: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers to improve performance on this particular topic. [Facility Posters__, N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Recognize freedom of association and collective bargaining. Respect the rights of workers to join an employee association or trade union, or refrain from doing so, without interference, in accordance with applicable law and practice'. However, it is not clear whether the Company requires suppliers to respect those rights in all contexts, as it indicates in accordance with applicable law and practice'. In cases where the Company refers to local law, evidence is needed of equivalent worker bodies, parallel mechanisms, etc. Moreover, the Company is expected to prohibit intimidation, harassment, retaliation and violence against trade union members and trade union representatives. <p>The company provided comments for this indicator, however, they provided no new information and were therefore not material for the assessment. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However, there is no further information about the actual work the Company is doing with its suppliers in relation to freedom of association and collective bargaining. [Facility Posters__, N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Walmart expects suppliers to take responsibility for the safety and wellbeing of the workers who produce products for Walmart. Provide a safe, clean, and healthy work environment as appropriate for your industry, geography, and workforce. This includes ensuring facilities are structurally sound, fit for purpose, compliant with electrical and fire safety laws and standards, and well maintained. Provide access to clean and sanitary facilities and clean drinking water. Implement appropriate procedures and safeguards to prevent accidents and injuries to workers. Establish proper maintenance, monitoring, and inspection routines, worker training and protection, and fire safety measures. Take appropriate steps to protect workers from exposure to harmful chemicals, infectious disease, and other similar risks. Observe restrictions on hazardous work for young workers'. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as (...) women (...)'. Also, 'In addition to complying with all applicable laws, suppliers must not engage in or tolerate discrimination, harassment, and unfair treatment based on an (...) sex, pregnancy (...)'. However, no supplier requirement found, in its contractual arrangements or supplier code of conduct, where the Company indicates that suppliers should provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The company provided comments for this indicator, however, they contained no new information and were therefore not material for the assessment. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on women's rights: Although the Company discloses examples of different projects it collaborates with to support women empowerment, no evidence found of work done with women in the ICT sector. Previous assessment was based on a source dated 2018, which is now out of the three-year timeframe that the methodology requires. [Dignity of Women (web), N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The webpage section Responsible Sourcing indicates: 'We include the Standards for Suppliers in supplier agreements'. The Standards for Suppliers requires suppliers to: 'Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable agreements. Ensure workers understand these terms'. However, no evidence found, in its Supplier Code of Conduct or contractual arrangements, of supplier requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods. [Standard for Suppliers (Product Suppliers), N/A: corporate.walmart.com] & [Responsible Sourcing (web), N/A: corporate.walmart.com] • Not Met: How working with suppliers on working hours: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However the posters do not clarify what the law say in reference to working hours, and there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters__, N/A: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates in its Conflict Minerals Policy: 'Walmart expects its product suppliers to actively support Walmart's conflict minerals compliance efforts by: adopting responsible mineral sourcing policies in dealing with their supply chains that are consistent with this policy and the OECD guidance'. However, no evidence of contractual obligations for suppliers to perform due diligence in line with OECD Guidance could be found. [Conflict Minerals Policy (web), N/A: corporate.walmart.com] • Not Met: Works with smelters/refiners and suppliers to build capacity: It also indicates: 'Association's (RILA's), we worked with other retailers to produce training materials and tailor the questionnaire originally developed by the Responsible Business Alliance (RBA) and the Global e Sustainability Initiative (GeSI) to be more specific to retail suppliers. We also engaged third party firms with specialized experience in various aspects of conflict minerals to assist Walmart in the development and implementation of our program, which includes due diligence activities consistent with the Organization for Economic Co-operation and Development (OECD) Guidelines'. However, it is not clear how it works with smelters/refiners and with suppliers to contribute to building their capacity in risk assessment and improving their due diligence performance (including through industry-wide initiatives). [Conflict Minerals Policy (web), N/A: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information: The Company indicates in its Conflict Minerals Policy: 'Walmart expects its product suppliers to actively support Walmart's conflict minerals compliance efforts by: (...) supplying products to Walmart that do not contain 3TG minerals that have been sourced under circumstances that contribute to or support human rights violations in the DRC, and providing evidence to support their representations as to the conflict minerals status of their products upon request'. However, although this requirement comes from a policy, it is not clear that it is incorporated into commercial contracts/written agreements with suppliers. [Conflict Minerals Policy (web), N/A: corporate.walmart.com] • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The company provided additional comments for this indicator. However, the evidence did not include information material for the assessment. • Not Met: Identification of smelter/refiners and OECD Guidance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Discrimination • Headline: Two former Walmart employees filed a class action lawsuit in federal court in Illinois alleging that the company refused to treat pregnant women like other disabled workers, as federal and state law requires • Story: In May 2017, Reuters reported that two former Wal-Mart employees filed a class action lawsuit in federal court in Illinois alleging that the company refused to treat pregnant women like other disabled workers, as federal and state laws requires. One of the plaintiffs said she was fired after being injured carrying a heavy tray on the job and inquiring about the company's policy toward pregnant workers, while another stated that she was reprimanded for asking co-workers to do heavy lifting for her, forced to go out on unpaid leave and paid USD 2.00 an hour less when she returned to work. <p>The workers claim that until 2014, the company's policy denied pregnant workers the same accommodations as other disabled employees in violation of a federal law requiring employers to treat pregnancy as a temporary disability and make appropriate adjustments. Nearly 50,000 female workers might have been affected by Wal-Mart's former policy. On September 24, 2018, the JDSUPRA website reported that the U.S. Equal Employment Opportunity Commission (EEOC) argued in a lawsuit that Walmart violated federal law when it refused to accommodate workers' pregnancy-related medical restrictions. According to the EEOC's lawsuit, Alyssa Gilliam and a class of pregnant employees at Walmart's Distribution Center were disallowed from taking part in a company program that accommodated other workers' restrictions.</p> <p>According to the investigation conducted by the EEOC, it is indicated that WalMart had a robust light-duty program that allowed workers with lifting restrictions to be accommodated. But Walmart deprived pregnant workers of the opportunity to participate in its light-duty program, explained Julianne Bowman, the EEOC's district director in Chicago. On October 17, 2019, it was reported that Walmart has agreed to pay USD 14 million to settle the lawsuit. The agreement will provide relief to about 740 employees in two separate settlement classes but the company admitted no wrong-doing. [Reuters, 21/09/2018, "U.S. agency accuses Walmart of pregnancy discrimination in lawsuit": reuters.com] [Bloomberg Law, 06/12/2019, "INSIGHT: Employer Lessons From the WalMart Pregnancy Discrimination Settlement": news.bloomberglaw.com]</p>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In a statement the company denied the women's claims and said Wal-Mart's pregnancy policies "have always fully met or exceeded both state and federal law." The company reported that a separate anti-discrimination policy it maintains has long listed pregnancy as a protected status. [Reuters, 21/09/2018: reuters.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The statement denies the allegations in general without addressing individual cases.
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: Wal-Mart spokesperson Randy Hargrove told NPR the Arkansas-based company denies the allegations and contends "this case is not suitable for class treatment." He said, "Walmart is great place for women to work. We do not tolerate discrimination, and we support our associates by providing accommodations every day across all of our stores, clubs, distribution centers and offices. [...] Our accommodations policy has been updated a number of times over the last several years and our policies have always fully met or exceeded both state and federal law and this includes the Americans with Disabilities Act and the Pregnancy Discrimination Act". Although the company reached an agreement regarding the lawsuit, CHRB does not consider this as engagement and as the company admitted to no wrongdoing, it is still denying the allegations. [NPR, 21/09/2018, "Federal Commission Sues Walmart For Alleged Discrimination Against Pregnant Employees": text.npr.org] • Not Met: Identified cause: The company denies the allegations and does not present investigative findings of underlying causes of the events.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company denies the allegations and did not take actions to prevent future recurrence of similar issues. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provided remedy: The company agreed to settle the class action and pay \$14 million to the plaintiffs. [Bloomberg Law, 06/12/2019: news.bloomberglaw.com] • Not Met: Evidence for lack of Impact or link: Wal-Mart denies the allegation, however, the company does not provide sufficient evidence that the affected stakeholders did not suffer the violations. While the agreement to settle the lawsuit does not include an admission of the allegation, it is, at the same time, not suitable evidence of a lack of impact. [Bloomberg Law, 06/12/2019: news.bloomberglaw.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: There is no indication that the affected stakeholders considered the remedy to be unsatisfactory. • Met: Remedy delivered: There is no evidence that the company did not provide the remedy as agreed in the settlement. • Not Met: Independent remedy process used: The lawsuit, as an independent process under the CHRB methodology, did not come to the conclusion that the alleged events did not take place. [Bloomberg Law, 06/12/2019: news.bloomberglaw.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Forced labour; discrimination • Headline: Walmart among companies accused of using suppliers linked to forced labour in China • Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Walmart among 83 other companies benefiting from the use of potentially abuse labour transfer programs. <p>According to the report, more than 80,000 Uyghur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country.</p> <p>The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. ASPI used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used labourers.</p> <p>ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uyghur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": aspi.org.au]</p>
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: A response from the company is not publicly available. <p>The company provided feedback for this indicator, however, this did not include relevant evidence that is available in the public domain. It was therefore not relevant for the assessment.</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: See above
E(2).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: CHRB found no information available in the public domain that would be relevant for the assessment of this indicator. • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: In December 2021, there were reports that the world's largest retailer had stopped stocking products from Xinjiang in its China-based Walmart arm Sam's Club stores, after President Biden

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>signed a bill banning companies from selling goods in the U.S. made with Xinjiang components unless they can prove forced labor wasn't involved. However, in January 2022, Walmart Inc. arm Sam's Club, denied the move in a call with analysts and termed it "a misunderstanding". A Sam's Club representative told local analysts in a call organized by a domestic securities firm that Chinese consumers failed to find products from Xinjiang because the app does not support searches for products based on names of places. There is thus no evidence that the company made changes to its policies following the events. [Bloomberg, 24/12/2021, "Walmart Blasted by Chinese Consumers Over Missing Xinjiang Items": bloomberg.com] [Business and Human Rights Resource Centre, 05/01/2022, "China: Walmart arm Sam's Club denies having deliberately removed Xinjiang-sourced goods from its app": business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Forced labour <p>• Headline: EBay, Wal-Mart, and Amazon allegedly sell Turkmenistan cotton products</p> <p>• Story: On the 19th February, 2019, Apparel Insider reported that products made with cotton that was picked using forced labour have been found on Amazon, Wal-Mart and eBay. In May 2018, US Customs and Border Protection (CBP) banned the import of any products containing cotton from Turkmenistan due to the country's systematic use of state-sponsored forced labour during the annual cotton harvest.</p> <p>According to Cotton Campaign (part of International Labour Rights Forum), to harvest cotton, the Turkmen government forces tens of thousands of citizens to pick cotton each year. Authorities force public sector workers, including teachers, doctors, nurses, and staff of government offices to pick cotton, pay a bribe, or hire a replacement worker, under threat of losing their job. Despite national laws prohibiting child labour and a 2008 ban of child labour in the cotton sector, children continue to do the hazardous field work, because the government maintains the cotton production system. Children pick cotton for their parents, who are forced by the government to fulfill individual cotton picking quotas under threat of losing their jobs.</p> <p>Researchers from the International Labour Rights Forum found cotton hand towels advertised as made in Turkmenistan on the websites of Amazon, Wal-Mart, and eBay which raised legitimate questions about the companies' social standards in their supply chains. The International Labor Rights Forum said none of retailers are directly importing or selling the products, but instead they were allowing third-party sellers access to their e-commerce platforms in exchange for a cut of the sales proceeds.</p> <p>[Apparel Insider, 19/02/2019, "Turkmenistan cotton products found on Walmart, ebay and Amazon websites": apparelinsider.com] [Business and Human Rights Resource Center, 18/02/2019, "Amazon, eBay & Walmart allegedly sell goods made with Turkmen cotton produced with forced labor": business-humanrights.org] [Reuters, 31/01/2019, "Are Amazon, Walmart, and eBay's online 'marketplaces' providing a refuge for goods made with forced labor?": news.trust.org]</p>
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: Wal-Mart responded the allegation regarding Turkmen cotton via the public platform Business and Human Rights Resource Center (BHRRC)stating: "Thank you for your inquiry and a chance to respond to allegations that Walmart sells goods made with Turkmen cotton produced with forced labor. When we were contacted by the Thomson Reuters Foundation, we let them know we take allegations of forced labor seriously, and we would look into their inquiry, which we did. Walmart does not sell these items directly. Rather, there were some items sold by third party sellers on our online marketplace, and we removed these sellers' products that were made with

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Turkmen cotton from the site." [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] [Apparel Insider, 19/02/2019: apparelinsider.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: Although the company provided a response to BHRRRC, and states that "We take a whole systems approach to worker dignity, not just at Walmart, but for the benefit of the entire global supply chain." Walmart did not provided any further details concerning the individual aspects of the allegation. In particular it did not address whether is still maintains business relationships with the sellers that were implicated. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] [Apparel Insider, 19/02/2019: apparelinsider.com]
E(3).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: Although the company states in its answer to the allegation that "Walmart is recognized as a leader in programs and policies that support the dignity of workers in our supply chain, and a key tenet of that commitment is working in a focused and collaborative way to help reduce forced labor in the global supply chain", the company did not provide any further evidence that has engaged in dialogue with affected stakeholders or that it encourages the implicated sellers to do so. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] • Not Met: Identified cause: While the company identified the third party seller on their website, it does not present investigative results of the underlying issues of forced labour in Turkmenistan. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: In its response the company outlines several responsible sourcing tools and other efforts it takes to "help reduce forced labor in the global supply chain". However, it does not specify how those are applied to Turkmenistan cotton. Furthermore, the initiatives described were already in existence at the time the alleged conduct took place. Therefore, they are not sufficient for this datapoint. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] • Not Met: Stakeholder input to steps taken
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: The company discloses that "through complementary philanthropic efforts that have widely shareable outputs, the Walmart Foundation has funded prevalence studies on forced labor, funded offices and programs to advance the fight against forced labor and funded awareness and training programs with NGOs like International Justice Mission, Issara Institute, Polaris Project and Pacific Links Foundation to understand the forced labor landscape and migration patterns in order to develop interventions for industry wide solutions. We take a whole systems approach to worker dignity, not just at Walmart, but for the benefit of the entire global supply chain." However, there is no evidence that the company provided remedy to the stakeholders affected by the alleged conduct. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company discloses that "through complementary philanthropic efforts that have widely shareable outputs, the Walmart Foundation has funded prevalence studies on forced labor, funded offices and programs to advance the fight against forced labor and funded awareness and training programs with NGOs like International Justice Mission, Issara Institute, Polaris Project and Pacific Links Foundation to understand the forced labor landscape and migration patterns in order to develop interventions for industry wide solutions. We take a whole systems approach to worker dignity, not just at Walmart, but for the benefit of the entire global supply chain." However, there is no evidence that the company provided remedy to the stakeholders affected by the alleged conduct. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org] • Not Met: Remedy delivered: The company discloses that "through complementary philanthropic efforts that have widely shareable outputs, the Walmart Foundation has funded prevalence studies on forced labor, funded offices and programs to advance the fight against forced labor and funded awareness and training programs with NGOs like International Justice Mission,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Issara Institute, Polaris Project and Pacific Links Foundation to understand the forced labor landscape and migration patterns in order to develop interventions for industry wide solutions. We take a whole systems approach to worker dignity, not just at Walmart, but for the benefit of the entire global supply chain." However, there is no evidence that the company provided remedy to the stakeholders affected by the alleged conduct. [Business and Human Rights Resource Center, 18/02/2019: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Health & safety • Headline: COVID-19. ASDA part of Walmart among others accused by EFFAT report of poor working and housing conditions responsible for COVID-19 outbreak among workforce • Story: On July 8, 2020, it was reported by the Business & Human Rights website that a new report by the European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT) identified poor working, employment and housing conditions as one reason for the rapid spread of COVID-19 among thousands of workers at meat processing plants such as ASDA across Europe with predominantly migrant workforce. At the time these conditions were found ASDA was owned by Walmart. <p>Exploitative working conditions, overcrowded accommodation, up to 16 hour-working days, low pay, illegal wage deductions and job insecurity are but some of the alleged injustices facing meat workers in Europe. The sector depends to a large extent on migrant and cross-border workers both from inside the EU and from third countries. Whether employed through abusive subcontracting practices, as temporary agency workers, posted workers or forced to accept (bogus) self-employed status, the working, housing and employment conditions of a vast proportion of meat workers are simply deplorable – both a cause and symptom of exploitation, social dumping and unfair competition across Europe, claimed the report.</p> <p>This EFFAT report outlined the sector situation in regards to COVID-19 across various countries in Europe. It also provided an overview of the work arrangements and business practices pursued by meat companies to cut costs and escape employer liability.</p> <p>[Business and Human Rights Resource Centre, 08/07/2020, "Europe: Poor working & housing conditions at meat packing plants responsible for COVID-19 outbreak among workforce, report alleges" : business-humanrights.org] [European Federation of Food Agriculture and Tourism Trade Unions, 30/06/2020, "Covid-19 outbreaks in slaughterhouses and meat processing plants": effat.org]</p>
E(4).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, ASDA stated: "We have worked collaboratively with Kirklees Council and Public Health England since the site closed over a week ago and they support our decision to reopen last month. The site has re-opened on a reduced capacity and only colleagues that have been tested and declared fit to return will be on site. Those colleagues who are self-isolating will continue to receive full pay until they return to work. Whilst Kirklees Council are satisfied with our existing safety procedures, we have introduced some additional measures as a precaution. These include separation of colleagues on different shifts and checking the temperature of colleagues before they enter the site". [Business and Human Rights Resource Centre, 08/07/2020 : business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In response to the allegation, ASDA stated: "We have worked collaboratively with Kirklees Council and Public Health England since the site closed over a week ago and they support our decision to reopen last month. The site has re-opened on a reduced capacity and only colleagues that have been tested and declared fit to return will be on site. Those colleagues who are self-isolating will continue to receive full pay until they return to work. Whilst Kirklees Council are satisfied with our existing safety procedures, we have introduced some additional measures as a precaution. These include separation of colleagues on different shifts and checking the temperature of colleagues before they enter the site". The company is thereby outlining the issue of health and safety risks to its

Indicator Code	Indicator name	Score (out of 2)	Explanation
			employees and the steps it has taken to mitigate these in the future. [Business and Human Rights Resource Centre, 08/07/2020 : business-humanrights.org]
E(4).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: ASDA stated: "We have worked collaboratively with Kirklees Council and Public Health England since the site closed over a week ago and they support our decision to reopen last month. However, neither of the entities mentioned are legitimate representatives of the affected stakeholders. • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: Walmart and Sam's Club in the U.S. strongly encouraged, but did not mandate, associates to get vaccinated. To help make vaccination as easy as possible, the company offered appointments to associates in stores and clubs, providing two hours' paid time to get a vaccination. The company also enhanced its COVID -19 emergency leave policy to three days of paid leave for any vaccine side effects for associates. <p>According to the company statement "The site has re-opened on a reduced capacity and only colleagues that have been tested and declared fit to return will be on site. Those colleagues who are self-isolating will continue to receive full pay until they return to work. Whilst Kirklees Council are satisfied with our existing safety procedures, we have introduced some additional measures as a precaution. These include separation of colleagues on different shifts and checking the temperature of colleagues before they enter the site" [Business and Human Rights Resource Centre, 08/07/2020 : business-humanrights.org] [Environmental Sustainability, Social and Governance, 2021: corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(4).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Area: Working hours • Headline: Investigation reveals 'numerous' labour abuses in garment factories linked to major brands • Story: In late 2018, a special report on garment factories in Ethiopia highlighted verbal abuses, labour abuses, poor working conditions, unpaid or forced overtime, docked wages for minor infractions, and wages well below the living wage for textile workers. At one of the facilities, MAA Garment and Textiles, Kebire Enterprises Plc. (MAA) factory in the town of Mekelle, reports alleged excessive wage deductions for minor disciplinary transgressions, ignorance of rules and laws banning forced overtime, mandatory overtime for workers, and collapsing of workers due to overworking and other factors. Additionally, managers have compelled women workers to provide sexual favours in return for promotions. The MAA factory has produced goods for retailers such as H&M and Wal-Mart. [Workers Rights Consortium, 31/12/2018, "Ethiopia is a North Star - grim conditions and miserable wages guide apparel brands in their race to the bottom": business-humanrights.org] [Quartz Africa, 08/05/2019, "Ethiopia's garment workers make clothes for Guess, H&M, and Levi's—but are the world's lowest paid": qz.com] [Reuters, 16/04/2019, "Tommy Hilfiger and Calvin Klein probe 'labor abuses' in Ethiopian factories": reuters.com]
E(5).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In 2019 the company stated that that it is reviewing the allegations and will engage its suppliers as needed. [Business and Human Rights Resource Centre, 13/05/2021, "Ethiopia: Major apparel brands accused of 'race to the bottom' after investigation reveals wages as low as \$0.12 per hour & 'numerous' labour abuses in garment factories; Incl. co. Responses" : business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Not Met: Detailed response: The response remains general and does not address the individual aspects of the allegation. [Business and Human Rights Resource Centre, 13/05/2021: business-humanrights.org]
E(5).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Engaged with stakeholders Not Met: Identified cause Score 2 <ul style="list-style-type: none"> Not Met: Identified and implemented improvements Not Met: Stakeholder input to steps taken
E(5).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Provided remedy Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> Not Met: Remedy satisfactory to stakeholders Not Met: Remedy delivered Not Met: Independent remedy process used
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> Area: Working hours; discrimination; health & safety; FoA/CB Headline: Walmart's supplier subject of a report over labour rights violations in the Honduran melon fields Story: On April 24, 2020, the International Labor Rights Forum, Fair World Project, and the International Union of Food Workers (IUF) Latin America Regional Secretariat jointly published a report which illustrates labour rights violations by Fyffes, a supplier for Albertsons, Kroger, Walmart and Giant, an Ahold Delhaize subsidiary. In 2019, Costco and Whole Foods stopped buying Fyffes' Honduran melons due to the ongoing allegations. <p>The report reviews the alleged history of Fyffes labour rights violations in Honduras, the ongoing abuses and the responses from Fyffes, which includes silencing workers' lived experiences by employing futile corporate social responsibility programmes that distract supermarkets and consumers from the reality on the farms.</p> <p>Fyffes employs over 6,500 melon workers in Honduras, the majority of whom are women and seasonal workers. In 2016 the workers decided to address their longstanding issues by organizing a union with el Sindicato de Trabajadores de la Agroindustria y Similares (STAS). In response, local bosses fired and blacklisted dozens of outspoken union leaders and launched a violent union-busting campaign - physically, verbally and psychologically harassing union members.</p> <p>During the 2019-2020 growing season, workers at Fyffes farm in Honduras reportedly continue to experience blatant violations of their legally guaranteed rights, including the dangerous misuse of toxic pesticides, denial of sick leave, the company's failure to enrol its seasonal workers in the national healthcare and pension system, and coercion to force them to leave STAS and to join a company-controlled union that was founded by management, in order to destroy genuine worker organizing.</p> <p>[Business and Human Rights Resource Centre, 21/04/2020, "Honduras: Report reveals labour abuses faced by 6,500 workers on Fyffes' melon plantations, incl. union-busting, harassment & toxic pesticides exposure" : business-humanrights.org] [International Labor Rights Forum, 21/04/2020, "Fyffes Farms Exposed: The Fight for Justice in the Honduran Melon Fields": laborrights.org]</p>
E(6).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Public response: In response to the allegation, the company stated: "Given our high expectations of our suppliers, we took these claims seriously when they were first raised to us and we continue to do so today. We have coordinated directly with Fyffes, conducted multiple internal investigations at these facilities, and have subjected these facilities to independent third-party social compliance audits. The findings from these investigations and audits were not consistent with your published report. Given our commitment to promoting the dignity of workers in our supply chain, we will continue to monitor the progress of these facilities and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>take appropriate action whenever we identify violations of our standards". [Business and Human Rights Resource Centre, 21/04/2020 : business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.
E(6).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: While the company claims it has "conducted multiple internal investigations at these facilities, and have subjected these facilities to independent third-party social compliance audits," there is no evidence suggesting that the company engaged with the affected stakeholders. <p>The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment.</p> <ul style="list-style-type: none"> • Not Met: Identified cause: While the company claims it has "conducted multiple internal investigations at these facilities, and have subjected these facilities to independent third-party social compliance audits," the company does not present results of these investigations or if they identified underlying causes of the events concerned. <p>The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment. [Business and Human Rights Resource Centre, 21/04/2020 : business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment. • Not Met: Stakeholder input to steps taken: The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment.
E(6).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: The company stated: "We have coordinated directly with Fyffes, conducted multiple internal investigations at these facilities, and have subjected these facilities to independent third-party social compliance audits. The findings from these investigations and audits were not consistent with your published report". However, since the company does not make the results of these investigations publicly available, there is not sufficient evidence as required by this datapoint. <p>The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment. [Business and Human Rights Resource Centre, 21/04/2020 : business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(7).0	Serious allegation No 7		<ul style="list-style-type: none"> • Area: Forced labour • Headline: Supply chain of Tesco, Asda, Waitrose, and others linked to forced labor in the UK • Story: A number of supermarkets in the UK have been accused of being supplied fresh produce from exploited slave labour. The companies include Tesco, Asda (subsidiary of Walmart), Waitrose and others. The operation was uncovered by the anti-slavery charity Hope for Justice and an official police investigation was launched in February 2015. The gang that provided the labour is accused of promising over 400 ex-cons and alcoholics in Poland good money for moving to England to work, but instead make less than 50p per day and live in subpar conditions. 'According to an investigation by the Times all of the supermarket and firms involved claim they knew nothing about the exploitation of the workers. There is also no suggestion any of the companies were complicit.' Following two trials, five men and three women have been convicted of modern slavery offences,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and seven of those have been convicted of money laundering. They were sentenced at the Birmingham Crown Court on 5 July.</p> <p>While the company does no longer own Asda as of February 2021, it was owner at the time the alleged conduct was taking place. [The Sun, 07/07/2019, "SLAVE LABOUR Your groceries picked by slaves – How Britain's biggest slavery gang supplied supermarkets such as Tesco, Asda and M&S": thesun.co.uk] [BBC News, 05/07/2020, "Slavery gang fugitive Ignacy Brzezinski captured in Poland": bbc.com]</p>
E(7).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: Asda, the UK subsidiary of Walmart involved in the allegation, referred the Daily Mail to the British Retail Consortium, who issued a statement on behalf of retailers affected by the investigation. The BRC's chief executive, said: 'The BRC and our members believe that any form of human trafficking or labour exploitation is completely unacceptable. Retailers have a protocol in place aimed at supporting victims and enabling perpetrators to be brought to justice. Retailers are leading efforts to tackle labour exploitation and are careful to work with suppliers who provide proper working conditions for their workers. However, this issue demonstrates that much more needs to be done, which is why we continue to call on the Government to strengthen the Modern Slavery Act and for greater enforcement to prevent exploitation now and in the future.' <p>However, this does not qualify as a public response by the company or the directly linked business, therefore it does not meet the requirements for this datapoint. [Daily Mail, 07/07/2019, "More than 450 Polish 'modern slaves' entrapped by gang who were convicted last week were forced to work supplying top supermarkets including Asda, Tesco and Waitrose": dailymail.co.uk] Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(7).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(7).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of

publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit [creativecommons.org](https://creativecommons.org/licenses/by-nc-nd/4.0/)