

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Walmart  
**Sector** Food and agricultural products, Apparel & ICT manufacturing (supply chain only)  
**Overall score** 18.5 out of 100

Theme score	Out of	For theme
1.3	10	A. Governance and Policy Commitments
6.9	25	B. Embedding Respect and Human Rights Due Diligence
5.0	20	C. Remedies and Grievance Mechanisms
1.9	25	D. Performance: Company Human Rights Practices
3.3	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 Policy Commitments (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"> <li>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, 02/11/2018: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to 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. No further details found during last revision. [Human Rights Statement_web, 02/11/2018: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Not Met: Commitment to OECD MNE Guidelines</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO	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"> <li>Not Met: Commitment to ILO core principles: The Company states in its Human Rights Statement: 'Our response to human rights issues is informed by</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Declaration on Fundamental Principles and Rights at Work		<p>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, ‘to be informed by’ is not considered a formal statement of commitment according to CHRB wording criteria. No further details found during last revision. [Human Rights Statement_web, 02/11/2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Explicitly lists all four ILO core principles: It 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.’ 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’. No further details found during last revision. [Human Rights Statement_web, 02/11/2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to ILO core principles: As indicated below, it is not clear whether all ILO core areas are respected in all contexts and locations. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Human Rights Statement_web, 02/11/2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
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"> <li>• Not Met: Commitment to respect H&amp;S of workers: The Code of Conduct indicates: ‘Making Walmart a safe place to work and shop builds trust with our associates and customers—and it’s the right thing to do. If you see something that could put someone’s health or safety at risk, report it immediately and take action to keep yourself and others safe’. The same Code indicates that Company has a Global Environmental, Health &amp; Safety Policy, which could not be found. No publicly available policy statement committing it to respect the health and safety of workers found. [Code of Conduct, N/A: <a href="http://walmartethics.com">walmartethics.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Global Forced Labor Prevention Policy indicates: ‘Workers should not be subject to excessive working hours, as defined by local laws and ordinances’. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Policies and Guidelines_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to H&amp;S of 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,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compliant with electrical and fire safety laws and standards, and well maintained'. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour 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 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (AG)	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"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards</li> <li>• Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Forests Policy indicates: 'Walmart also acknowledges the importance of indigenous peoples and local communities in preserving and protecting forests. [...]Sustainable forest management [...] helps prevent conversion of natural forests to plantations or other land uses, helps promote indigenous peoples' and worker rights [...]'. However, no commitment to respecting Indigenous Peoples rights found. [Policies and Guidelines_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect the right to water: The Sustainable Row Crop Position Statement indicates: 'Implement water management plan – Optimizing farming techniques, decisions, and management to limit impacts that the water use and discharge will have on the watershed, community health, and regional ecology by assessing operation needs, identifying needs of other water users in the basin(including nature as a user, e.g., minimum required flows), comparing to total available renewable water, and designing interventions and adjusting water uses to bring water use into the boundaries of the basin'. However, no commitment to respecting the right to water found. [Policies and Guidelines_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing</li> <li>• Not Met: Expects 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AG)	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"> <li>• Not Met: Commitment to women's rights [Global Responsibility Report 2018, 2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights: The Standards for Suppliers indicates: 'Be aware of indicators of involuntary labor and actively address them. Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as migrants, women, and young people'. However, it is not clear the Company expects suppliers to commit to respect women's rights or children's rights or migrant workers' rights. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.3.AP	Commitment to respect human rights	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"> <li>• Not Met: Commitment to women's rights [Global Responsibility Report 2018, 2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	particularly relevant to the sector – vulnerable groups (AP)		<ul style="list-style-type: none"> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to 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.</li> <li>• Not Met: Expects suppliers to respect these rights: The Standards for Suppliers indicates: 'Be aware of indicators of involuntary labor and actively address them. Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as migrants, women, and young people'. However, it is not clear the Company expects suppliers to commit to respect women's rights or children's rights or migrant workers' rights. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the sector – responsible sourcing of minerals (ICT)	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"> <li>• Not Met: Commitment to responsible mineral sourcing</li> <li>• Met: Commitment to following OECD Guidance on 3GT: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Requires suppliers to commit to responsible mineral sourcing: The Conflict Minerals Policy 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 violations in the DRC, and providing evidence to support their representations as to the conflict minerals status of their products upon request'. The Standards for Suppliers indicates: 'suppliers must comply with all applicable trade, sanctions, conflict minerals [...] laws and regulations'. 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to OECD Guidance covers all minerals</li> <li>• Not Met: Expects suppliers to make similar requirements of their suppliers</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (ICT)	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"> <li>• Not Met: Commitment to women's rights [Global Responsibility Report 2018, 2018: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights: The Standards for Suppliers indicates: 'Be aware of indicators of involuntary labor and actively address them. Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as migrants, women, and young people'. However, it is not clear the Company expects suppliers to commit to respect women's rights or children's rights or migrant workers' rights. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	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"> <li>• Not Met: Commitment to remedy adverse HRs impacts</li> <li>• Met: Expects 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			during audits'. The company's Standards for Suppliers (Product Suppliers) requires suppliers to 'remediate issues where they exist'. [Code of Conduct, N/A: <a href="http://walmartethics.com">walmartethics.com</a> ] & [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with suppliers on remedy</li> </ul>
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"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

### A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• 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, 21/07/2022: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Human Rights Statement_web, 02/11/2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member: According to information provided on the company's website (during 2022 review), several board members have experience in diversity and equality. However, no evidence was found during latest review of human rights expertise from board members tasked with human rights oversight responsibility. [Board of Directors (web), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Board member/CEO signal importance of HRs in their communications: The president and CEO of the company referred to human rights commitments among other things in the 2020 Regeneration Speech. [Regeneration Speech 2020, 2020: <a href="http://corporate.walmart.com">corporate.walmart.com</a> ]</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Process to review HRs strategy at board level: 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.' 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. No further details found during last revision. [Human Rights Statement_web, 02/11/2018: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Human Rights_web, 21/07/2022: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period: No further details found during last revision.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions: No further details found during last revision.</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs 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, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: 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 &amp; Compliance; Global People; Labor Relations; Responsible Sourcing; Culture, Diversity &amp; Inclusion; Global Responsibility; Government Affairs; Communications; and Legal'. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations: Although the Company describes the HRWG, including expertise/departments involved no further details found in relation to resources allocated (i.e. people, geographical allocation, knowledge, etc. ). No further details found during last revision. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HRs risks integrated as part of enterprise risk system: The Company states in its Human Rights website that 'The Audit Committee oversees the company's ethics and compliance programs, which include health and safety, discrimination and harassment, and responsible sourcing; it also oversees the company's Enterprise Risk Management process, which covers human rights generally as well as specific human rights issues. [...] Walmart assesses performance and progress through various means, including our Enterprise Risk Management process, diversity and inclusion measurement and reporting, pay equity analyses, and deeper dives into risks in particular areas of the business (e.g., fresh food manufacturing)'. [Human rights (web), 07/07/2021: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Provides an example</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Risk assessment by Audit Committee or independent third party</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Communicates HRs policies 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 2,000,000 associates received ethics training. An updated global training module and awareness campaigns were launched in 2021 to support our new Code of Conduct'. The Code contains the Company's human rights policies. [Code of Conduct, N/A: <a href="http://walmartethics.com">walmartethics.com</a>] &amp; [Human Rights_web, 21/07/2022: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
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"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to supply chain</li> <li>• Met: Requires suppliers to communicate HRs policies: The webpage section Responsible Sourcing 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: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: 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: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
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"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Met: Describes how workers are trained on HRs 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 2,000,000 associates received ethics training. An updated global training module and awareness campaigns were launched in 2021 to support our new Code of Conduct'. The Code contains the Company's human rights policies. [Code of Conduct, N/A: <a href="http://walmartethics.com">walmartethics.com</a>] &amp; [Human Rights_web, 21/07/2022: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Trains relevant managers including procurement on HRs: 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>forced labor, health and safety, and category-specific training'. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Met: Meets both requirements under score 1</li> <li>• Met: Trains suppliers to meet HRs commitments: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
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"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The webpage section Responsible Sourcing indicates: 'We take a risk-based approach to auditing suppliers' disclosed facilities, which allocates more resources to facilities located in countries with greater potential risks. Audits focus on a variety of issues, including worker compensation, voluntary labor practices, working age laws and standards, working hours and facility health and safety standards'. The webpage section People in the Supply Chain that 'whether and when an audit is required for a disclosed facility is dependent on several risk-based factors: Region/Territory Risk. [...] Channel. [...] Prior Audit Results. [...] We rely on third-party auditing programs to monitor suppliers' social compliance at these facilities'. However, it is not clear how the Company monitors the implementation of its human rights policy commitments across its own operations. No further details found during last revision. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [People in Supply Chains_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses % of supply chain monitored: The webpage section People in the Supply Chain indicates: 'As of April 2022, Walmart recognized 11 approved third-party audit programs. Walmart assessed approximately 14,000 third-party audit reports in FY2022'. However, it is unclear what percent of the supply chain it represents. [People in Supply Chains_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes 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. No further details found during last revision. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Met: Describes corrective actions process: The webpage section People in the Supply Chain indicates: 'We assign risk ratings to all audited facilities and higher-risk suppliers. These risk ratings may result from the auditing or case management processes described in this brief. Audited Facilities are assigned color ratings based on their compliance and risk levels. 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. [...] 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes: The webpage section People in the Supply Chain indicates: 'In FY2022, 27 facilities</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			received a red rating. Since 2012, Walmart has stopped doing business with 39 suppliers in response to serious violations of our Standards'. However, no evidence found of the findings beyond red ratings. [People in Supply Chains_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a> ]
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"> <li>• Met: HRs performance affects selection 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 &amp; Guidance, 10/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> <li>• Met: HRs performance affects continuation 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 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Works with suppliers to meet HRs requirements: The 2022 ESG Report Summary indicates: 'Systemic issues such as forced labor, unsafe working conditions and gender inequity require collective action to bring about significant, positive and lasting protection of worker well-being. Walmart and the Walmart Foundation collaborate with suppliers, NGOs, experts and others to address root causes of these issues, foster solutions and accelerate adoption at scale. We have committed to working with others to address risks to the dignity of workers in a minimum of 10 retail supply chains by 2025, focusing on the following supply chains to date: Apparel in Bangladesh; Produce in Mexico and the U.S.; Shrimp in Thailand; Tuna in Thailand; Electronics sourced for the U.S. retail market'. [2022 ESG Report Summary, 2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
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"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years: In its 2021 ESG Report Summary, the Company discloses its stakeholders. It includes: associates [workers], suppliers and communities. The webpage section Stakeholder Engagement includes 'People Who Work in Product Supply Chains' to the list. It discloses the ESG priorities of each group and channels of engagement. However, it is not clear how it has identified and engaged affected stakeholders on human rights, including workers or local communities in its supply chain, in the last two years. [2021 ESG Report Summary, 2021: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Stakeholder Engagement_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>

## 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"> <li>• Not Met: Describes process of 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. No further details found during last revision. [Human Rights Statement_web, 02/11/2018: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process for identifying risks in business relationships: Regarding its supply chain management, the webpage section People in Supply Chain indicates: 'We employ a risk-based approach to monitor for compliance with our Standards, focusing on areas that pose the greatest potential risk to worker dignity. Our merchants and sourcing teams manage risk by engaging their suppliers to make our expectations clear, providing resources and information to clarify expected practices and hold them accountable for compliance where necessary'. However, evidence seems to refer to compliance monitoring rather than due diligence carried out to proactively to identify the human right risks and impacts in its supply chain. 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: 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 Human Rights experts and affected stakeholder consultation for ongoing due diligence process (identification of potential human rights risks and impacts). [Human Rights Statement_web, 02/11/2018: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
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"> <li>• Not Met: Describes assessment process and discloses salient HRs risks: 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'. However, no further information found describing the assessment process, including a description of social, economic, geographical and/or other factors are taken into consideration. [Policies and Guidelines_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes how process applies to supply chain: The webpage section Responsible Sourcing indicates: 'We take a risk-based approach to auditing suppliers' disclosed facilities, which allocates more resources to facilities located in countries with greater potential risks. Audits focus on a variety of issues, including worker compensation, voluntary labor practices, working age laws and standards, working hours and facility health and safety standards. At Walmart, we strive to continually improve our risk-based audit program so we can better allocate our resources to higher-risk facilities and help increase overall compliance'. However, this seem to be part of its compliance monitoring system. Although the Company describes country risk level is taking into account in determining risks, evidence focuses on 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. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Public disclosure of results of HRs risk assessment: The Company discloses the following salient human rights issues in its ESG report: 'Treating workers with respect; Promoting a safe &amp; healthy work environment; Providing a fair &amp; inclusive work environment; Combating forced &amp; underage labor'. Each of these contains key aspects, which include pay and working hours, freedom of association and collective bargaining, debt bondage, etc. [2022 ESG Report Summary, 2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
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"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain: The webpage section People in Supply Chain indicates: 'By policy, suppliers are required to remediate any identified non-compliances with our Standards for Suppliers. [...] 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 remediating non-compliance. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [People in Supply Chains_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: The Company discloses different recent examples of Walmart &amp; Walmart Foundation support programs and tools that engage workers to raise awareness and strengthen worker protections in supply chains, including: 'The Walmart Foundation provided support to CIERTO, a non-profit international farm labor contractor, which engages migrant agricultural workers in the North American Corridor before, during and after their recruitment, a process that strengthens protections for workers and enables them to take corrective action where necessary'. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
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"> <li>• Not Met: Describes system for evaluation effectiveness of actions: The webpage section People in the Supply Chain indicates: 'In 2016, Walmart and Walmart Foundation set an aspiration to help make responsible recruitment the standard business practice for employers throughout global supply chains within a decade (by 2026). Since then, our business and philanthropic efforts have focused on the following [...]: Conducting due diligence, including funding research into the prevalence of social concerns in industry supply chains and/or regions and tracking progress toward improvement'. 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights 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"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	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"> <li>• Met: Grievance mechanism 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, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The webpage section Human Rights indicates the WalmartEthics.com 'is available in 11 languages and is globally accessible'. The Global Helpline 'is equipped to handle most local languages spoken in each of the retail markets where we operate'. 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, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes how workers in supply chain access 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 &amp; 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Expects suppliers to convey expectation to their 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The webpage section Human Rights 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, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The webpage section Human Rights indicates the WalmartEthics.com 'is available in 11 languages and is globally accessible'. The Global 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. No further details found during last revision. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes how external individuals/communities access grievance mechanism: 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, 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: <a href="https://one.walmart.com">one.walmart.com</a>]</li> <li>• Not Met: Expects supplier to convey expectation to their suppliers</li> </ul>
C.3	Users are involved in the design and performance of	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"> <li>• Not Met: Describes how users engaged on design and performance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	the mechanism(s)		<ul style="list-style-type: none"> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(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"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: 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 &amp; Compliance will follow up with most concerns within 72 hours. [...] Ethics &amp; 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 &amp; 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: <a href="http://walmartethics.com">walmartethics.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: 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, 21/07/2022: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes 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'. The Code of Conduct adds: 'Any associate who engages in retaliation will be subject to disciplinary action. If you feel that you have been retaliated against for reporting a concern, contact your People Lead or Ethics &amp; Compliance'. [Integrity Builds Trust_web, N/A: <a href="http://walmartethics.com">walmartethics.com</a>] &amp; [Human Rights_web, 21/07/2022: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence: While the company indicates 'Walmart does not tolerate retaliation for reporting a concern or participating in an investigation', this subindicator is asking for more specific commitments. [Code of Conduct, N/A: <a href="http://walmartethics.com">walmartethics.com</a>]</li> <li>• 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. On the other hand, as indicated in C.2, Responsible sourcing compliance seems to accept complaints from third parties and, as indicated above, there's a commitment to non-retaliate against any party. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remedying adverse 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"> <li>Not Met: Describes approach taken to remedy adverse HRs impacts: The webpage section Responsible Sourcing indicates: 'Walmart became a founding member of the Alliance for Bangladesh Worker Safety in 2013. The Alliance concluded its mission at the end of 2018 after training nearly 1.6 million factory employees on basic safety and providing more than 1.5 million workers in 1,000 factories access to a helpline they could use to anonymously report safety or other job-related concerns. Furthermore, 93% of total remediation items across Alliance-affiliated factories are now complete — including 90% of items most critical to life safety'. However, this evidence refers to actions that took place more than three reporting years ago. No further details found during last review. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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"> <li>Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The webpage section People in the Supply Chain indicates: 'In FY2022, we managed over 700 cases related to more serious allegations of non-compliances with our Standards for Suppliers'. However, no further information found including the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [People in Supply Chains_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Describes process to evaluate mechanism and changes made as a result: The webpage section Human Rights indicates: 'We work to see that concerns are appropriately addressed in a timely manner. We also monitor the number and types of inquiries and allegations received through these and other channels to understand where we may need to strengthen our policies or procedures'. However, no further description found of the process it has in place to review the effectiveness of the grievance mechanism and any changes made to improve it based on the review. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

### D.1 Food and Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.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"> <li>Not Met: Requirements on living wage in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Not Met: Describes work with suppliers on living wage</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Describes practices to avoid price or short notice requirements that undermine HRs: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes practices 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Met: Example of assessing and changing of 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
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"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites: The Company 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. This also needs to include the product source. No further details found during last revision. [Disclosure Policy and Guidance, 02/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: 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. No further details found during last revision. [Disclosure Policy and Guidance, 02/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>
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"> <li>• Not Met: Requirements on child labour in supplier codes and 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. No further details found during last review. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on eliminating child labour: The webpage section Human Rights indicates some ‘examples of our philanthropic investments in the NAC and how they map to our salient human rights issues’, including for ‘Combating forced &amp; underage labor’: ‘Coalition of Immokalee Workers: Scale worker-driven social responsibility model beyond tomatoes in Florida Fair Trade USA: maximize the impact and transparency of premium programs, improving support for farmers and workers (focusing on producers of berries, tomatoes and coffee). CIERTO: Strengthen and develop scalable systems for responsible recruitment of H-2A farm workers from Mexico on U.S. farms including workers’ knowledge of their rights in communities of origin’. However, no further description found of how it works specifically with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Requirements on debt/fees in supplier codes and 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes work with suppliers on debt/fees for job seekers/workers: 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and 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. No further details found during last revision. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full 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. It also discloses some of its ‘philanthropic investments in the NAC and how they map to our salient human rights issues’, including: ‘Wilson Center: Better focus domestic Mexican labor enforcement efforts on forced labor/recruitment fees and conditions of work (payroll taxes, harassment and discrimination) in the produce sector’. However, no further description found of the specific work done with suppliers to ensure workers are paid regularly, in full and on time. No further details found during last revision. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Requirements on free movement in supplier codes and 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers: 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. No further details found during last revision. [Facility Posters__, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/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. No further details found during last revision. [Facility Posters__, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Requirements on H&amp;S in supplier codes and contracts: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses injury rate or lost days in supply chain in last reporting period</li> <li>• Not Met: Discloses fatalities for workers in supply chain in last reporting period</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers of H&amp;S: The webpage section People in the Supply Chain indicates: 'In 2017 Walmart was a member of the Joint Committee on Responsible Labor Practices, a committee convened by United Fresh and the Produce Marketing Association and including growers, packers, distributors, marketers and retailers of fresh produce and flowers. As a member of the Committee, Walmart helped develop the Ethical Charter. The Charter contains guiding principles and values intended to provide a framework for responsible labor practices in fresh produce and floral supply chains. The Charter is based on a foundation of employment law, good management systems and sound occupational safety and health practices. Since launching the Charter in 2018, Walmart has been an advocate of the Ethical Charter—as it aligns with the values of our own Standards for Suppliers—and a promoter of becoming an endorser. Walmart and other endorsers have been working with ELEVATE and the Equitable Food Initiative (EFI) on a project that aims to develop and pilot non-audit approaches focused on management systems, such as self-assessment, self-guided actions and capacity building for managers and workers for the Charter's implementation. By the end of 2022 Walmart U.S. aims to source 100% from fresh produce and floral suppliers who have endorsed the Ethical Charter on Responsible Labor Practices. As of the end of FY2022, 69% of net sales came from suppliers who have endorsed the Ethical Charter'. However, it is not clear the actual work done with suppliers to improve their practices on health and safety. [Human Rights_web, 21/07/2022: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on land and tenure rights in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work 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: <a href="https://cdn.corporate.walmart.com">cdn.corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requirement for suppliers to provide compensation in resettlement</li> <li>• Not Met: Assessment of scope of land rights issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

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"> <li>• Not Met: Requirements on access to water and sanitation in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on access to water</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of water and sanitation issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on women's rights in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work 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 [...]. Walmart Foundation's Market Access program, launched in 2017, focuses on helping Farmer Producer Organizations build capacity in India, Mexico and Central America to help smallholder farmers prosper. Since 2017, the Walmart Foundation has provided grants which are expected to reach more than 730,000 smallholder farmers in India, Mexico and Central America, 320,000 or 44% of whom are women. This grants of more than \$67 million are helping provide market access and build resilience. [...] These programs are strengthening farmer livelihoods, enhancing value chains, growing the adoption of sustainable agriculture practices, unlocking access to finance, growing formal market linkages, strengthening FPOs and empowering women farmers in FPOs. As part of this total reach to smallholders, the Walmart Foundation's smallholder investments in India, to date, include over \$29 million, making good on a 2018 commitment to invest \$25 million over five years to improve farmer livelihoods in that country'. 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. Current evidence seems to focus on women owned business. [Dignity of Women_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of women's rights issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

## 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"> <li>• Not Met: Requirements on living wage in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Describes practices to avoid price or short notice requirements that undermine HRs: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes practices 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Met: Example of assessing and changing of 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
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"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites: The Company 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 apparel suppliers, including direct and indirect suppliers. This also needs to include the product source. No further details found during last revision. [Disclosure Policy and Guidance, 02/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: 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. No further details found during last revision. [Disclosure Policy and Guidance, 02/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>
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"> <li>• Not Met: Requirements on child labour in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on eliminating 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. No further details found during last revision. [Facility Posters___, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Requirements on debt/fees in supplier codes and 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes work with suppliers on debt/fees for job seekers/workers: The Company explains its collaboration with the International Organization for Migration (IOM). 'In 2019, Walmart engaged this United Nations agency 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 trained 100 facilities in Thailand and Malaysia on managing the risks of migrant worker exploitation and trained over 90 recruiters<sup>11</sup> 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and 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. No further details found during last revision. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Requirements on free movement in supplier codes and 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers: 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. No further details found during last revision. [Facility Posters___, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/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. No further details found during last revision. [Facility Posters___, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Requirements on H&amp;S in supplier codes and contracts: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses injury rate or lost days in supply chain in last reporting period</li> <li>• Not Met: Discloses fatalities for workers in supply chain in last reporting period</li> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes work with suppliers of H&amp;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 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. LABS has been active in India and Vietnam since 2019 where over 572,000 workers have benefited from the program. In May 2022 LABS launched its initiative in Cambodia where it will operate in all major hubs of Cambodia including Phnom Penh, Kandal, Kampong Cham, Kampong Chhnang, Kampong Speu, and Takeo and is expected to benefit approximately 206,000 workers in Cambodia in 2022. See LABS' December 2021 Program Report for an overview of its activities since inception in August 2019'. [People in Supply Chains_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.8.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"> <li>• Not Met: Requirements on women's rights in contracts/codes with suppliers: 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on women's rights: The webpage section Dignity of Women 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 overcoming barriers to market access for women smallholder farmers through the Walmart Foundation Market Access program supporting the empowerment of women in factories through the Empower@Work Collaborative, and sourcing from women-owned businesses in the U.S. and other markets. Over the past 10 years, we have sourced more than \$42 billion with women-owned businesses. [...] COVID-19 created devastating impacts on global supply chains. Low-wage, predominantly female garment workers have been disproportionately impacted, both by being put at risk and by spending savings on food and medical expenditures for their families. In October 2020, to promote benefits to factory workers with a focus on women's well-being, Walmart entered into a Memorandum of Understanding (MOU) with other retailers and the United States Agency for International Development (USAID). The MOU aims to establish a dialogue and identify any steps in the framework for further cooperation in activities that provide much-needed livelihood relief to the predominantly female workers in the supply chain'. However, no further explanation found on how it works with suppliers to improve their practices in relation to women's rights, as current evidence in apparel supply chain seems to focus on financial relief. [Dignity of Women_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.9.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"> <li>• Not Met: Requirements on working hours in codes/contracts with suppliers: 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work 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. No further details found during last revision. [Facility Posters___, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assesment of scope of excessive working hours in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

#### D.4 ICT Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.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"> <li>• Not Met: Requirements on living wage in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Describes practices to avoid price or short notice requirements that undermine HRs: 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes practices 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Example of assessing and changing of 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites: The Company 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. This also needs to include the product source. No further details found during last revision. [Disclosure Policy and Guidance, 02/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: 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 ICT supply chain including locations. No further details found during last revision. [Disclosure Policy and Guidance, 02/2021: <a href="https://one.walmart.com">one.walmart.com</a>]</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (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"> <li>• Not Met: Requirements on child labour in supplier codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on eliminating 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 asking information, communication and technology suppliers for the Walmart U.S. and Sam's Club U.S. retail market supply chains to implement the RBA Code of Conduct. Suppliers have the option to become an RBA member (regular or full category) or implement the RBA Validated Assessment Program for each disclosed facility. For Walmart U.S. in FY22, 87% of our information, communication and technology net sales were from suppliers who implemented the RBA Code of Conduct'. 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Requirements on debt/fees in supplier codes and 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: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Met: Describes work with suppliers on debt/fees for job seekers/workers: The Company explains its collaboration with the International Organization for Migration (IOM). 'In 2019, Walmart engaged this United Nations agency 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 trained 100 facilities in Thailand and Malaysia on managing the risks of migrant worker exploitation and trained over 90 recruiters<sup>11</sup> 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 helped 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, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain: No information found during last revision.</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and 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. No further details found during last revision. [Responsible Sourcing_web, N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time: No information found during last revision.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Met: Requirements on free movement in supplier codes and 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: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers: 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. No further details found during last revision. [Facility Posters__, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/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. No further details found during last revision. [Facility Posters__, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Requirements on H&amp;S in supplier codes and contracts: 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: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Discloses injury rate or lost days in supply chain in last reporting period</li> <li>• Not Met: Discloses fatalities for workers in supply chain in last reporting period</li> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers of H&amp;S</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on women's rights in contracts/codes with suppliers: 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work 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. No further details found during last revision. [Dignity of Women (web), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of women's rights issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirements on working hours in codes/contracts with suppliers: 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. No further details found during last revision. [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Responsible Sourcing_web, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work 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. No further details found during last revision. [Facility Posters___, N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Score 2</li> <li>• Not Met: Assesment of scope of excessive working hours in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers: 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'. The Standards for Suppliers requires suppliers to: 'Ensure that products are not produced—in whole or in part—in violation of the law or in a way that would cause Walmart to violate the law. In particular, suppliers must comply with all applicable trade, sanctions, conflict minerals [...] laws and regulations'. 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: <a href="http://corporate.walmart.com">corporate.walmart.com</a>] &amp; [Standard for Suppliers (Product Suppliers), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Describes work with smelters/refiners and suppliers on due diligence: 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). No further details found during last revision. [Conflict Minerals Policy (web), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requirement to disclose smelter/refiner information in contracts/codes with suppliers: 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. No further details found during last revision. [Conflict Minerals Policy (web), N/A: <a href="http://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>• Not Met: Requirement on suppliers covers all minerals</li> </ul>
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"> <li>• Not Met: Describes risk identification and disclosure in line with OECD Guidance: No information found during last revision.</li> <li>• Not Met: Describes process to identify smelters/refiners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses smelters/refiners assessed in line with OECD Guidance</li> <li>• Not Met: Risk identification and disclosure covers all minerals</li> </ul>
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"> <li>• Not Met: Describes risk management system for supply chain</li> <li>• Not Met: Describes process of monitoring risk prevention/mitigation system</li> <li>• Not Met: Discloses improvements in risk prevention/mitigation system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes engagement with suppliers/stakeholders on risk management strategy</li> <li>• Not Met: Risk management and response processes cover all minerals</li> </ul>

## 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"> <li>Area: Forced Labour</li> <li>Headline: Walmart among 22 companies accused of failing to pay minimum wages in India</li> <li>Story: On February 5, 2022, the All India Lawyers Association For Justice (AILAJ) published a report accusing Kitex Garments, an Indian manufacturer of children's wear and supplier to Walmart and Carter's of forced labour.</li> </ul> <p>The AILAJ's report alleged that Kitex Garments is treating its migrant workers as "bonded labourers" and described their working conditions at the facility as inhumane and oppressive with little to no employment wage or social security, stating that the workers are not allowed to leave labour camps unless granted permissions. The report then added that the workers have limited access to organizations such as trade unions.</p> <p>The AILAJ published the report about the working conditions of migrant workers at Kitex Garments following a clash between workers, factory security guards and police over "loud" celebrations of Christmas in December 2021. As a result of the clash, 174 workers were arrested including "innocent" workers who were "asleep in their dormitories" at the time. The report alleged that the factory management and the police collaborated in the arrests of the workers. The NGO also alleged that Kitex's management used the incident to blackmail migrant workers.</p> <p>Campaigns and communications coordinator at the Asia Floor Wage Alliance, a nonprofit that promotes living wages in the garment industry, added that "the migrant workers are generally too scared to speak out to officials because they fear the loss of employment."</p> <p>Kitex Garments reportedly refuted the allegations stating that the AILAJ's report was part of a "politically motivated witch hunt" against the company. The company later reinstated 123 migrant workers on March 6, 2022. [Sourcing Journal, 28/02/2022, "Indian Supplier to Walmart, Carter's Accused of 'Slave Labor'": <a href="https://sourcingjournal.com">sourcingjournal.com</a>] [AILAJ, 05/02/2022, "Fact-finding on incidents of 25.12.21 with respect to the management and workers of Kitex Garments, Ernakulam (AILAJ Kerala)": <a href="https://ailaj.wordpress.com">ailaj.wordpress.com</a>] [The Hindu, 06/03/2022, "Kitex Garments reinstates 123 migrant workers granted bail after Christmas arrests": <a href="https://thehindu.com">thehindu.com</a>]</p>
E(1).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"> <li>Not Met: Public response: Walmart did not respond to a request for comment from the Sourcing Journal. [Sourcing Journal, 28/02/2022 : <a href="https://sourcingjournal.com">sourcingjournal.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Detailed response</li> </ul>
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:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Engaged with stakeholders</li> <li>Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Identified and implemented improvements: The Company discloses its salient human rights issues, which include 'Treating Workers with Respect' including 'Pay; working hours; Freedom of association and collective bargaining; Meaningful opportunities for workers to be heard; ... Healthy work environments...; Forced labor, including debt bondage; ... Vulnerability of migrant workers; responsible recruitment.' The Company further discloses forced labour initiatives in several markets, but does not disclose how it identified and implemented improvements in the case of the alleged human rights impacts in India. [Human Rights (Web), 14/03/2023: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</li> <li>Not Met: Stakeholder input to steps taken</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or	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"> <li>Not Met: Provided remedy: The supplier Kitex Garments notes that it has 'decided to post bail for this group [of arrested workers] and allow them to come back to work and use our facilities until their trials occur.' It provides no further detail on how it addressed other aspects of the allegation. The Company does not</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	cooperate in remedy(ies)		<p>disclose how it used its leverage to provide remediation. [Sourcing Journal, 23/03/2022, "Kitex Garments Exec Disputes 'Slave Labor' Allegations" : <a href="https://sourcingjournal.com">sourcingjournal.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Evidence for lack of Impact or link: According to Sourcing Journal, the supplier 'Kitex Garments "categorically" refuted allegations that its migrant workforce is being treated as "bonded laborers."' A Kitex Garments spokesperson further notes 'that more than 90 independent audits have been conducted at Kitex over the past five years, including four in the past two months alone.' However, neither the supplier nor the Company disclose further details and evidence that the affected stakeholders did not suffer the alleged impacts. [Sourcing Journal, 23/03/2022 : <a href="https://sourcingjournal.com">sourcingjournal.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Area: Health &amp; safety</li> <li>• Headline: Walmart supervisor kills six employees</li> <li>• Story: On November 23, 2022, a Walmart supervisor opened fire on fellow employees in a store in Virginia. Six employees were killed and several more injured before the gunman shot himself. [Reuters, 25/11/2022, "Walmart supervisor opens fire on Virginia co-workers, killing 6 and himself": <a href="https://reuters.com">reuters.com</a>]</li> </ul>
E(2).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"> <li>• Met: Public response: The Company published a statement on its website outlining the events, including naming the employees that were killed and acknowledging the ones that were injured.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Detailed response: See above.</li> </ul>
E(2).2	The company has investigated and 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"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provided remedy: The Company indicates that 'we're supporting these families with funeral, travel and other expenses. And we have a physical site set up where associates can meet, connect and speak to counsellors. All Walmart associates and their families have access to confidential mental health support resources at no cost'. It further states that</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: At least one employee filed a lawsuit for \$50 million against the Company, accusing it of negligence in the case of the shooting. [Reuters, 01/12/2022, "Walmart worker's suit over shooting faces legal obstacles, experts say": <a href="https://reuters.com">reuters.com</a>]</li> <li>• Met: Remedy delivered: There is no indication that the remedy was not delivered as agreed.</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Area: Forced Labour</li> <li>• Headline: Walmart among other accused of workers' abuse in its Mexican supply chain</li> <li>• Story: On December 31, 2021, Los Angeles Times reported that Walmart, Albertsons, Target and Kroger have been accused of workers abuse after the Companies' suppliers - Agropecuarios Tom and Horticola Tom - were accused of forced labour in Mexico.</li> </ul> <p>The two targeted agribusinesses have allegedly withheld wages and subjected workers to abusive working and living conditions, among other violations, according to U.S. Customs and Border Protection (CBP).</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The Biden administration is blocking all tomato shipments from the agribusinesses based in the Mexican state of San Luis Potosi, under a "withhold release order" handed down in late October 2021 by U.S. Customs and Border Protection against Agropecuarios, Horticola, and their subsidiaries based on information that indicated the use of forced labour against its workers.</p> <p>The CBP has identified at least five of the International Labor Organization's (ILO) indicators of forced labour during its investigation, including abuse of vulnerability, deception, withholding of wages, debt bondage, and abusive working and living conditions.</p> <p>According to press sources, Del Campo Supreme, an Arizona distributor, received the vast majority of the produce. The other customer, was Mastronardi Produce, North America's largest distributor of greenhouse tomatoes.</p> <p>Mastronardi allegedly supplies most major U.S. retailers - including Walmart; Target; Kroger, which includes Ralphs and Food 4 Less; and Albertsons, the parent company of Safeway and Vons.</p> <p>The supply chain of Del Campo Supreme in the last year included Walmart and Albertsons.  [Los Angeles Times, 31/12/2021, "U.S. blocking tomato shipments from Mexican farms accused of abusing workers": <a href="https://www.latimes.com">latimes.com</a>] [U.S. Customs and Border Protection Release, 21/10/2021, "CBP Issues Withhold Release Order on Tomatoes Produced by Farm in Mexico": <a href="https://www.cbp.gov">cbp.gov</a>]</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"> <li>• Met: Public response: In an article covering the allegation, the Los Angeles Times reports that 'Walmart, which pledged reforms in 2015 but did not provide details of the measures, declined to respond to specific questions about how it holds accountable suppliers accused of forced labour abuses. The company said in a statement that it is "grateful to those in our supply chain who help us bring quality, affordable products to our customers. "We hold our suppliers to high standards as set out in our Standards for Suppliers to operate their facilities responsibly, safeguarding the well-being of their workers and workers from the facilities and farms they source from," said the statement provided by Blair Cromwell, the director of global responsibility communications for Walmart.' [Los Angeles Times, 31/12/2021: <a href="https://www.latimes.com">latimes.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail. [Los Angeles Times, 31/12/2021: <a href="https://www.latimes.com">latimes.com</a>]</li> </ul>
E(3).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"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: The Company's traceability requirements ask suppliers to 'Have controls in place to ensure that the organizations and entities involved in the supply chain are not subject to sanctions, withhold release orders ... Active monitoring of withhold release orders.'</li> </ul> <p>The Company further discloses its salient human rights issues, which include 'Treating Workers with Respect' and 'Combating Forced &amp; Underage Labor.' The Company further discloses that based on its salient human rights issues, it has identified five supply chains 'where we believe Walmart can make a positive impact.' One of the five focus areas is 'Produce in the U.S. and Mexico: all Walmart salient human rights issues.' It does not disclose details on action it has undertaken (besides funding provided by Walmart Foundation.)</p> <p>However, the Company does not disclose how it has implemented improvements or reinforced its management system(s) that have been identified to avoid the specific human rights impacts in the future. [Supplier Requirements for Supply Chain Traceability, May 2022: <a href="https://one.walmart.com">one.walmart.com</a>] &amp; [Human Rights (Web), 14/03/2023: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(3).3	The company has engaged with affected	0	<p>The individual elements of the assessment are met or not as follows:  Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	stakeholders to provide for or cooperate in remedy(ies)		<ul style="list-style-type: none"> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• Area: Health &amp; safety</li> </ul> <ul style="list-style-type: none"> <li>• <b>Headline:</b> 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</li> </ul> <ul style="list-style-type: none"> <li>• <b>Story:</b> On July 8, 2020, it was reported by the Business &amp; 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.</li> </ul> <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 &amp; Human Rights Resource Centre, 08/07/2020, "Europe: Poor working &amp; housing conditions at meat packing plants responsible for COVID-19 outbreak among workforce, report alleges" : <a href="https://business-humanrights.org">business-humanrights.org</a>] [European Federation of Food Agriculture and Tourism Trade Unions, 30/06/2020, "Covid-19 outbreaks in slaughterhouses and meat processing plants": <a href="https://effat.org">effat.org</a>]</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> Score 1 <ul style="list-style-type: none"> <li>• 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 &amp; Human Rights Resource Centre, 08/07/2020 : <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• 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 employees and the steps it has taken to mitigate these in the future. [Business &amp; Human Rights Resource Centre, 08/07/2020 : <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).2	The company has investigated and taken appropriate action	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"> <li>• 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.</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <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 &amp; Human Rights Resource Centre, 08/07/2020 : <a href="https://business-humanrights.org">business-humanrights.org</a>] [Environmental Sustainability, Social and Governance, 2021: <a href="https://corporate.walmart.com">corporate.walmart.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> <li>• Area: Working hours</li> <li>• Headline: Investigation reveals 'numerous' labour abuses in garment factories linked to major brands</li> <li>• 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&amp;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": <a href="https://business-humanrights.org">business-humanrights.org</a>] [Quartz Africa, 08/05/2019, "Ethiopia's garment workers make clothes for Guess, H&amp;M, and Levi's—but are the world's lowest paid": <a href="https://qz.com">qz.com</a>] [Reuters, 16/04/2019, "Tommy Hilfiger and Calvin Klein probe 'labor abuses' in Ethiopian factories": <a href="https://reuters.com">reuters.com</a>] [Business &amp; 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 &amp; 'numerous' labour abuses in garment factories; Incl. co. Responses": <a href="https://business-humanrights.org">bus</a></li> </ul>
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"> <li>• Met: Public response: In 2019 the company stated that that it is reviewing the allegations and will engage its suppliers as needed. [Business &amp; Human Rights Resource Centre, 13/05/2021 : <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not Met: Detailed response: The response remains general and does not address the individual aspects of the allegation. [Business &amp; Human Rights Resource Centre, 13/05/2021: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(5).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Engaged with stakeholders</li> <li>Not Met: Identified cause</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Identified and implemented improvements</li> <li>Not Met: Stakeholder input to steps taken</li> </ul>
E(5).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Provided remedy</li> <li>Not Met: Evidence for lack of Impact or link</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Remedy satisfactory to stakeholders</li> <li>Not Met: Remedy delivered</li> <li>Not Met: Independent remedy process used</li> </ul>
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> <li>Area: Working hours; discrimination; health &amp; safety; FoA/CB</li> <li>Headline: Walmart's supplier subject of a report over labour rights violations in the Honduran melon fields</li> <li>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.</li> </ul> <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 &amp; 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 &amp; toxic pesticides exposure" : <a href="https://business-humanrights.org">business-humanrights.org</a>] [International Labor Rights Forum, 21/04/2020, "Fyffes Farms Exposed: The Fight for Justice in the Honduran Melon Fields": <a href="https://laborrights.org">laborrights.org</a>]</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"> <li>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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>take appropriate action whenever we identify violations of our standards". [Business &amp; Human Rights Resource Centre, 21/04/2020 : <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.</li> </ul>
E(6).2	The company has investigated and 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"> <li>• 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.</li> </ul> <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"> <li>• 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.</li> </ul> <p>The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment. [Business &amp; Human Rights Resource Centre, 21/04/2020 : <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment.</li> <li>• 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.</li> </ul>
E(6).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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"> <li>• Not Met: Provided remedy</li> <li>• 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.</li> </ul> <p>The company provided feedback for this indicator, however, this included no further evidence material for changing the assessment. [Business &amp; Human Rights Resource Centre, 21/04/2020 : <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(7).0	Serious allegation No 7		<ul style="list-style-type: none"> <li>• Area: Forced labour</li> <li>• Headline: Supply chain of Tesco, Asda, Waitrose, and others linked to forced labour in the UK</li> <li>• 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,</li> </ul>

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&amp;S": <a href="https://www.thesun.co.uk">thesun.co.uk</a>] [BBC News, 05/07/2020, "Slavery gang fugitive Ignacy Brzezinski captured in Poland": <a href="https://www.bbc.com">bbc.com</a>]</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"> <li>• 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.'</li> </ul> <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": <a href="https://www.dailymail.co.uk">dailymail.co.uk</a>] Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>
E(7).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"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(7).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(8).0	Serious allegation No 8		<ul style="list-style-type: none"> <li>• Area: Discrimination</li> </ul> <ul style="list-style-type: none"> <li>• <b>Headline:</b> Investigation finds at least 2 women workers murdered prior to murder of Jeyasre Kathiravel at supplier Natchi Apparel</li> </ul> <ul style="list-style-type: none"> <li>• <b>Story:</b> On 1 January 2021 Jeyasre Kathiravel had failed to return home from work. Four days later her decomposing body was discovered by farmers just a few miles from her village.</li> </ul> <p>Her supervisor has since been charged with her murder and is in jail awaiting trial. For months before Kathiravel's death, her family and co-workers say that Thangadurai was perpetrating a relentless campaign of sexual harassment towards her, which she felt powerless to report or stop.</p> <p>In the weeks after her murder, dozens of other women working at the factory came forward to claim that they too were being harassed and assaulted at Natchi. Their bravery set off a chain of events that could transform the lives of the 3,000 women working at the factory and provide a blueprint for how global fashion brands can stop the epidemic of sexual violence that has taken hold in fast fashion supply chains.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Despite the factory’s denials after the allegations were made public, the Worker Rights Consortium (WRC), a global organisation investigating labour abuses, launched an independent investigation into Natchi. In a detailed report, investigators say that multiple interviews and evidence gathering with more than 60 workers led them to conclude that Kathiravel was not the first garment worker to have been murdered at Natchi. Investigators say they are confident that at least two other female workers besides Kathiravel were killed while working at Natchi between 2019 and 2021.</p> <p>The WRC says it is “virtually certain” that a company-contracted bus driver and labour recruiter murdered a female worker following a sexual relationship that began while they were both working at the factory. The report claims there is a “high likelihood” that a migrant worker was also murdered on factory grounds by an unknown perpetrator and her body dumped in a shipping container. The report claims that multiple Natchi employees, including an eyewitness, testified that the murder had occurred on factory property and that afterwards managers had told workers not to talk about the incident.</p> <p>Eastman Exports, which owns Natchi Apparels, says it “disputes the accuracy of a number of statements in the WRC report” and denies that the murder of a migrant worker occurred on Natchi premises. However, the company says it has taken all the allegations seriously and “has created systems, processes and procedures to protect and promote the rights of female workers”.</p> <p>[The Guardian, 22/05/2022, "Murder, rape and abuse in Asia’s factories: the true price of fast fashion": <a href="https://www.theguardian.com">theguardian.com</a>] [Business and Human Rights Resource Centre, 23/05/2022, "India: Investigation finds at least 2 women workers murdered prior to murder of Jeyasre Kathiravel at H&amp;M supplier Natchi Apparel; Incl. co comments": <a href="https://www.business-humanrights.org">business-humanrights.org</a>] [Worker Rights Consortium, 22/05/2022, "WORKER RIGHTS CONSORTIUM FACTORY ASSESSMENT Natchi Apparel (India) Findings, Recommendations and Corrective Actions": <a href="https://www.workersrights.org">workersrights.org</a>]</p>
E(8).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"> <li>• Not Met: Public response</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>
E(8).2	The company has investigated and 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"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(8).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>

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