



ANTICORRUPTION

GRI 205:103-1,103-2,103-3, 205-2, 205-3

We are committed to maintaining the highest standards possible and to complying with all legislation in force. In all our operations, we strive to avoid any situation that may appear as inappropriate actions by our top management, executives, collaborators, employees, agents or representatives.

Our [Global Anticorruption Policy](#) prohibits bribery in all cases, regardless of whether in transactions with public officials or with private sector companies or individuals.

Walmart is firm in its position on bribery and corruption: we compete fairly and honestly in all places where we operate worldwide; we never try to obtain competitive advantage through bribery, nor do we tolerate bribery or corruption in any manner whatsoever. Our Code of Conduct and Global Anticorruption Policy forbids any type of bribery and illicit payments, either related to transactions with government officials or with anyone in the private sector as well.



All members of the Board of Directors received in-person training in ethics and anticorruption-based subjects

Our anticorruption compliance is designed to manage risks of bribery and corruption by incorporating regulatory guidelines and internationally recognized best practices to establish internal controls and effective auditing. The investments made in talent, processes and systems are not only meant to prevent and detect any risks of corruption, but also to proactively ensure the continuous improvement of the program based on risks, efficiency, effectiveness, and sustainability.

Zero tolerance to bribes, acts of corruption, or dishonest actions allows us to reach our objectives with full transparency. In the case any associate has suspicion or information at all on the violation of company policies or has any information on improper requests -even if rejected- these must be reported immediately to the Global Ethics contact points through the formal claims mechanisms.



Both associates and Board Members alike receive training in anticorruption once a year.

Our long-term goal in training is to continue offering courses to all relevant parties -both internal and external- in the matters pertaining to anticorruption based on tailor-made materials and frequencies. This will enable us to optimize the time and resources employed for training, also ensuring the relevance of the content and the message communicated to each participant. All training is measurable and the goal is to reach 100% of the targeted audience during the corresponding period.



Over 26,300 associates in Mexico and 7,400 in Central America completed anticorruption training



In keeping with the purpose of evaluating risks associated with corruption, each year we conduct risk analysis, the results of which allow us to assign resources for the proper attention. This program is regularly reviewed by our continuous improvement team, who in turn provide timely feedback for early identification, establishing root-causes and providing the right solutions to identified situations. Likewise, the Internal Audit Team conducts periodic and independent audits.

Due diligence is conducted on outside third parties wishing to represent us, which includes their willingness to commit to complying with our Anticorruption Policy and to renew this commitment at least every year.

585 third parties in Mexico and 155 in Central America completed or renewed their anticorruption training

The approved third party receives risk-based training in said policy, thus ensuring they are familiar with this policy and its requirements

Each year a sample of our approved third parties are proactively audited by us in terms of several factors, including risks associated with the region where they operate and the type of service provided. This process allows us to examine third-party response to our anticorruption program, and to identify those areas where increased improvement to our training and controls is needed.