



ANTITRUST

GRI 206: 103-1, 103-2, 103-3, 206-1

The Global Policy on Antitrust Laws is a reflection of our commitment to maintain the highest standards in ethics and to always comply with antitrust and free enterprise legislation in all those countries where we operate.

Among the primary ones are our behavior guidelines and regulations, in addition to communication campaigns and training to guarantee that all negotiations, contact with suppliers and/or competitors are in strict adherence with corresponding regulations.

The aim is to achieve good-faith negotiations that are transparent, objective, and successful for both sides, honoring our promise to our customers of offering them every day low prices so they may live better.

● We have established controls for avoiding anticompetitive behaviors or practices





In 2021, the following key elements of the compliance program are:



Training conducted on participation in associations and guilds, reaching 95.3% of the target audience.



The Noisy Exits campaign was launched. It consists of a training video produced by the Home Office team to reinforce the protocol of action in the case of receiving non-requested sensitive trade information, which should never be shared either verbally or in writing.



Several communiqués on Free Enterprise were issued and sent to the entire Home Office team, with messages on attention to down raids by the authorities. There was also another communiqué aimed at operations personnel, informing them how they should reject any information that may be deemed sensitive, alerting them to the possibility of receiving it through social media, such as WhatsApp.



We were able to reach 96% of the commercial team audience, refreshing information on matters pertaining to free enterprise.



The Code on Reinforcement of Best Trade Practices was relaunched, with revisions to its content. El Mediator under Best Trade Practices is a concept created by the Code, which purpose is to foster agreements between our Commercial Teams and the Suppliers, in the case of any controversies regarding the interpretation and use of said document.



The **CBL** e-training platform on global competencies was launched, **training 99% of our target audience.**

The company is confident it always acts in adherence to applicable legislation, and that its participation in the Mexican market has always resulted in the lowest possible prices for our consumers, especially benefitting lower-income Mexican families, and those living remote areas of the country who have not been served by others.

The behavior of our suppliers plays a fundamental role in achieving compliance with all antitrust and antitrust legislation. We wholly expect that our suppliers understand comply fully with these laws, which are designed to promote free and fair enterprise and to help activate open markets, improve productivity and foster innovation and value for our customers. The violation of these laws can have severe financial and reputational consequences for individuals and for companies.

Our suppliers are forbidden from entering into anti-trust agreements with their competitors as pertains to sales with Walmart, or to share prices, costs, or other privileged information regarding business conducted with Walmart.