

Human Rights Statement

Commitment to Respect Human Rights

Walmart’s business is a people business: we employ millions of people, hundreds of millions of people shop with us weekly, and people work for the tens of thousands of suppliers that make the products we sell.

Walmart believes business has a responsibility to respect human rights. Our approach to human rights is grounded in our core values: respect for the individual, service to the customer, striving for excellence, and acting with integrity. We are committed to respecting human rights in our own operations and to making our suppliers aware of our expectation that they respect the human rights of the people who make the products we source and sell. We strive to use our position as an employer, retailer, and community member to promote respect for human rights. We believe Walmart’s business thrives when our associates, people in our supply chain, customers, and our communities thrive.

Our approach to human rights 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, the United Nations Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. We have also considered input from relevant internal and external stakeholders and experts, including rightsholders and human rights NGOs.

This statement describes Walmart’s approach to human rights in our operations globally, including all associates at all levels of the organization, as well as our promotion of respect for human rights across our supply chain. It covers Walmart’s approach to due diligence, selection of salient human rights issues, human rights governance, and grievance and remedy processes.



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Human Rights Due Diligence

The U.N. Guiding Principles on Business and Human Rights recognize four essential components of an effective human rights due diligence program.

Walmart’s approach to human rights due diligence reflects those components: the assessment of actual and potential adverse human rights impacts, integration and acting upon the findings of assessments, tracking the effectiveness of the response to adverse human rights impacts, and communicating how impacts are addressed.

Walmart recognizes that vulnerable populations, such as women, children, indigenous peoples, and ethnic and religious minorities, are often the most marginalized and at risk of human rights abuses. Consistent with the U.N. Guiding Principles on Business and Human Rights, our due diligence efforts focus on addressing the most severe actual and potential impacts on human rights, including paying particular attention to actual and potential impacts on vulnerable populations. As a responsible corporate citizen, we aim to ensure that our business practices do not cause or contribute to existing inequalities and injustices suffered by those groups.

Human rights risks are complex and can be the result of systemic issues, making it challenging for any single organization to eliminate those risks itself. Our approach therefore seeks to go beyond our own policies, processes, and business relationships by working collaboratively with other stakeholders to inform our approach and identify root causes; sharing our work with others; and using our leverage to help prevent and mitigate risks and drive positive change.

Salient Issues

Walmart’s approach to human rights due diligence prioritizes addressing the human rights issues that are most salient to our activities or business relationships. We identify our salient human rights priorities based on factors such as the scale, severity, and likelihood of the potential adverse human rights risk; connection to our business; and Walmart’s ability to drive impact.

Salient Issue	Key Aspects
Treating workers with respect	Pay; working hours.
	Freedom of association and collective bargaining.
	Meaningful opportunities for workers to be heard.
Providing a safe and healthy work environment	Physical safety and security of work premises.
	Workplace abuse. Healthy work environments.
Providing a fair and inclusive work environment	Anti-discrimination and harassment.
	Belonging including but not limited to race, gender, or protected status.
Combatting forced and child labor	Forced, trafficked, child and underage labor.
	Vulnerability of migrant workers, responsible recruitment.
Using technology and personal data responsibly	Data privacy and security.
	Ethical AI and biometrics. Transparent use of human-facing technology.



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We respect the fundamental 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 child labor and the elimination of discrimination in respect to employment and occupation.

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, form or not to join an employee association or trade union of their choice without interference. Associates should exercise these rights in an informed manner, and with the benefit of thoughtful consideration and available information. In the exercise of these rights, we believe in the free exchange of ideas, opinions and information, provided there is no interference.

Human Rights Governance

Management

Walmart's enterprise risk management process identifies, assesses, and assigns responsibility for managing key risks to the company, including relevant aspects of salient human rights issues. .

Board of Directors

The Walmart Inc. Board of Directors and Board committees oversee and monitor the management of the most significant human rights issues relevant to our company. The Nominating and Governance Committee of the Board is responsible for overseeing Walmart's environmental, social, and governance agenda, including our overall approach to human rights, and receives updates on these initiatives from Walmart's Chief Sustainability Officer. Other Board committees, including the Compensation and Management

Development Committee, and Audit Committee—are also charged with oversight of certain salient human rights issues and company strategies to mitigate potential human rights impacts.

The Board reviews our progress on human rights, at minimum, annually and aspects of salient human rights issues are often discussed in Board committees.

Grievance & Remediation

Walmart provides grievance mechanisms which assist in addressing potential human rights issues in both our own operations and our supply chains: these systems aim to help individuals and communities who may be adversely impacted by providing an opportunity to raise their concerns directly with Walmart or the applicable supplier.

In our operations, Walmart's Code of Conduct encourages associates, suppliers, vendors, service providers, business partners, customers, and community members to raise issues, ask questions, and report concerns—including those related to human rights. Walmart associates are encouraged, and in some instances required, to speak up. Cases may be referred to business units for follow-up or investigated by an appropriate team. Violations of our Code of Conduct and Ethics and Compliance program policies can lead to discipline up to and including termination.

In our supply chains, suppliers' employees and workers must be able to raise concerns in good faith and without fear of retaliation. Due to our indirect relationship with workers in supply chains, the primary mechanisms for raising grievances are with the workers' employers, Walmart's suppliers, and relevant local authorities. Suppliers must provide a mechanism for workers to report concerns to management, to the supplier, and to third parties such as Walmart. These mechanisms should allow for anonymity and prohibit

retaliation for reporting in good faith, including retaliation against third parties such as human rights organizations. Walmart continues to strive to promote the effectiveness of such grievance mechanisms and remedies by supporting opportunities for workers to be heard, communicating expectations to suppliers, and following up on allegations through our case management and investigations process. When issues are reported through the supplier's grievance mechanism, Walmart expects the supplier to promptly resolve the issue. Where issues are raised to Walmart concerning suppliers' operations, we typically work with the supplier toward resolution. We strive to support our supply chain toward compliant operations when possible, in furtherance of our mission to help people "Live Better."

Adopted as amended by the Walmart Board of Directors on September 6, 2024.



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