

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Wal-Mart Stores
Industry Apparel & Agricultural Products (Supply Chain only)
Overall Score (*) 23.7 out of 100

Theme Score	Out of	For Theme
0.5	10	A. Governance and Policies
2.7	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
2.9	20	D. Performance: Company Human Rights Practices
9.0	20	E. Performance: Responses to Serious Allegations
3.3	10	F. Transparency

(*) 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 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: General HRs commitment: No evidence found of reference to human rights neither in the 'Global Statement of Ethics' nor in the 'Standards for suppliers' document. . In its Sustainability Report 2018 the Company states: 'Walmart respects the right of workers to join, form or assists a trade union, or refrain from doing so as those rights are defined under applicable national law [...]. Those basic rights are informed by the ILO's 1998 Declaration on Fundamental Principles and Rights at Work which include freedom of association and effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.' The statement does not reflect a commitment but only a reference to the rights cover in ILO Convention. The Company also states: 'We are also committed to upholding human rights in supply chains by promoting safe, healthy and coercion free work environments through our Standards for Suppliers and Responsible Sourcing programs', in this case the commitment refers to the supply chain. [Global Statement of Ethics: walmartethics.com & Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: The Company's statement of ethics explicitly prohibits discrimination, limits working hours and commits to the health and safety of workers. In addition to Company operations, it expects 'all suppliers, consultants, law firms, public relations firms, contractors and other service providers to act ethically and in a manner consistent with this Statement of Ethics'. On the other hand, the Company states in its Global Sustainability Report 2018: 'Consistent with applicable law and practice, Walmart respects the rights of associates to join, form or not to join an employee association or trade union of their choice without interference.' However neither the statement of ethics nor the Global Sustainability Report commit it to respect the human rights of workers related collective bargaining. [Global Statement of Ethics: walmartethics.com] • Not met: UNGC principles 3-6 • Not met: All four ILO for AG suppliers: In its Standard for suppliers the Company sets out the expectations that suppliers need to respect the rights related to child labour, freedom of association, forced labour, fair employment process, health and safety and working hours. However, the commitment to respect collective bargaining is not clear. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: All four ILO for AP suppliers: See above [Standard for Suppliers: cdn.corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: All four ILO Core: See above [Global Statement of Ethics: walmartethics.com] • Met: Respect H&S of workers: See above [Global Statement of Ethics: walmartethics.com] • Met: H&S applies to AG suppliers: In its Standard for Suppliers the Company expects that its suppliers 'Provide a safe work environment. Cultivate a safe, clean and healthy work environment [...]. Implement procedures and safeguards to prevent accident and injuries to workers [...]' More detailed requirements are set in the Standards suppliers manual. [Standard for Suppliers: cdn.corporate.walmart.com] • Met: H&S applies to AP suppliers: See above [Standard for Suppliers: cdn.corporate.walmart.com] • Met: working hours for employees: See above [Global Statement of Ethics: walmartethics.com] • Met: Working hours for AP suppliers: In its Standards for Suppliers the Company expects that its suppliers 'Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable agreements.' More detailed requirements are set in the Standards suppliers manual. [Standard for Suppliers: cdn.corporate.walmart.com & Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (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"> • Not met: Respect land ownership and resources • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights [Standard for Suppliers: cdn.corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: IFC Performance Standards [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: FPIC for all [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Zero tolerance for land grabs [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry -	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights: The Company has put in place initiatives related to empowering women such as 'Women's Economic Empowerment', 'Catalyst CEO Champions for Change Pledge' or 'Passion for Parity'. However, no evidence found of a formal commitment to respect women's rights. [Women's Economic

Indicator Code	Indicator name	Score (out of 2)	Explanation
	people's rights (AG)		Empowerment (Website): corporate.walmart.com & Global Responsibility Report 2018, 2018: corporate.walmart.com <ul style="list-style-type: none"> • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's Rights: The Company has put in place initiatives related to empowering women such as 'Women's Economic Empowerment', 'Catalyst CEO Champions for Change Pledge' or 'Passion for Parity'. However, no evidence found of a formal commitment to respect women's rights. [Women's Economic Empowerment (Website): corporate.walmart.com & Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement • Met: Regular stakeholder engagement: Its Global Responsibility Report 2018 includes a 'Stakeholder Engagement' chapter, where it states: '[...] we engage stakeholders formally in periodic materiality reviews, and on going basis through numerous mechanisms [...].' In this section the Company describes some initiatives with different stakeholders, which include Communities, Associates (employees), suppliers. [Global Responsibility Report 2018, 2018: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts • Not met: Work with AP suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): Evidence found only in relation to protecting the integrity of reporters in the context of ethics violations. [Global Statement of Ethics: walmartethics.com] Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments • Not met: Expects AP suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: CEO or Board approves policy: Its Global Statement of Ethics includes an introduction signed by its CEO. However this policy does not include a direct reference to human rights. [Global Statement of Ethics: walmartethics.com] • Not met: Board level responsibility for HRs: The Nominating and Governance Committee is responsible for the review of 'Social, community, sustainability and charitable giving initiatives'. However, the Company has not specified this includes human rights issues. [Proxy Statement, 2018: s2.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO: The CEO made a speech in which it mentions how forced labour can take place and indicates that the Company joined the Leadership Group for Responsible Recruitment. However, there is not specific reference to Human Rights. [CEO Speech at Net Impact: corporate.walmart.com]
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
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"> Not met: Incentives for at least one board member: The Company indicates that 'associates subject to its culture, diversity and inclusion' goals program have 10% of their annual performance evaluation tied to diversity and inclusion and can have their annual cash incentive reduced by up to 30% if they violate our discrimination and harassment policies'. However, it is not clear whether board members are included, the incentive refers only to non-discrimination which is not considered a key industry risk, and part of the incentive seems reactive (reduction of bonus for violate policy) [Global Responsibility Report 2018, 2018: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Not met: At least one key AG HR risk, beyond employee H&S Not met: At least one key AP HR risk, beyond employee H&S <ul style="list-style-type: none"> Not met: Performance criteria made public

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior responsibility fo HR (inc ILO): 'Our ethics, compliance and risk committees have proven to be an effective tool to keep our leaders throughout the company involved in that work. Walmart's most senior executives are members of the company's Global Ethics, Compliance, and Risk Committee. We meet regularly— more than quarterly, and over 40 times since 2012. We discuss current issues related to ethics, compliance, and other enterprise-level risks. We structure the meetings to ensure follow-up and accountability for our action items. Each of Walmart's retail markets has its own similar committee. These committees correspondingly consist of the market's senior management and its ethics and compliance leaders, including both the market CEO and the market Chief Ethics and Compliance Officer. The open and continuous dialog created by these committee discussions has kept our management teams active in managing our risks and developing our culture.' However, its Global Ethics Program does not cover all ILO core. [Reflecting on What We've Built: Walmart's Global Ethics & Compliance Program, 2017: cdn.corporate.walmart.com] Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for AG in supply chain Not met: Day-to-day responsibility for AP in supply chain
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"> Not met: Senior manager incentives for human rights Not met: At least one key AG HR risk, beyond employee H&S Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR part of enterprise risk system Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment

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B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Communicates its policy to all workers in own operations: The Company does not have public policies which include the commitment to respect all ILO core labour standards. [Global Statement of Ethics: walmartethics.com] Score 2 <ul style="list-style-type: none"> • Not met: Communication of policy commitments to stakeholder: See above • Not met: How policy commitments are made accessible to audience: See above
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Steps to communicate policy commitments to BRs: The Standards for suppliers, which include specific sections related to: forced labour, underage labour, fair employment process, working hours, freedom of association and health and safety, is part of the contractual agreements with suppliers. However, the commitment to respect collective bargaining is not clear. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Including to AG suppliers: See above. In its Standards for Suppliers the Company indicates: 'We expect you and all facilities in your supply chain to embrace both the words of and principles behind these Standards for Suppliers.' and also: 'Suppliers are responsible for compliance with these Standards throughout their operations and throughout the entire product supply chain.' However not all ILO are included. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Including to AP suppliers: See above [Standard for Suppliers: cdn.corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: See above [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Including on AG suppliers: See above. It is not clear whether the contractual/binding arrangements cascade to its suppliers' supply chain. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Including on AP suppliers: See above [Standard for Suppliers: cdn.corporate.walmart.com]
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Trains all workers on HR policy commitments: No evidence found of public policies including respect for all the ILO core labour standards. However in its Website section 'Responsible Sourcing', the Company describes how it provides 'training and tools for our associates and suppliers, and collaborate with others to make progress on key industry-wide issues.' [Global Statement of Ethics: walmartethics.com & Responsible Sourcing: corporate.walmart.com] • Not met: Trains relevant AG managers including procurement • Not met: Trains relevant AP managers including procurement Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Monitoring implementation of HR policy commitments: The Company does not have public policies including respect for the five ILO core labour standards. [Global Statement of Ethics: walmartethics.com] • Not met: Monitoring AG suppliers: The Company indicates in its Website section 'Audit and Monitoring' that: 'we use social, safety and environmental compliance audits to help us evaluate our suppliers' overall compliance. However, it is not clear if collective bargaining is one of the topics monitored. [Audits and Monitoring (website): corporate.walmart.com] • Not met: Monitoring AP suppliers: See above [Audits and Monitoring (website): corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Met: Describes corrective action process: On its Website the Company describes the investigation and corrective action process when a non-compliance appears: 'To reinforce the supplier's responsibility for managing its supply chain in a manner consistent with our Standards for Suppliers, we administer the Supplier Strike program. A supplier may receive a 'Strike' for certain findings of noncompliance in their supply chains. [...] The Strike program creates an escalating set of pressures and consequences for suppliers that can lead to termination of their business with Walmart. Strikes remain on a supplier's record for two years, and three strikes within a two-year period will typically result in a significant reduction or termination of a supplier's business relationship with Walmart. The Strike program

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			<p>is one of the tools we use to promote a compliant supply chain.' The company also makes reference to a colour rating based on the third-party program's evaluation: 'Walmart uses colour ratings as a tool to make decisions about suppliers and facilities and to promote remediation'. 'All suppliers using the facility are expected to work with the facility to remediate all non-compliances identified in the report in the manner dictated by the audit program chosen. In addition to this audit program-driven remediation, Walmart expects suppliers to prioritize the remediation of higher-risk findings that would lead to the facility receiving an Orange rating'. Orange rating identifies facilities with serious violations. Three consecutive orange makes a red rating which would lead to temporarily or permanently terminate facility's ability to produce product. [Audits and Monitoring (website): corporate.walmart.com]</p> <ul style="list-style-type: none"> • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored: In its Global Responsibility Report 2018 the Company indicates that it has ' reviewed and assessed compliance with our Standards for more than 13,000 audits'. However there is no information about the percentage that this number represents. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Discloses % of AP supply chain monitored: See above [Global Responsibility Report 2018, 2018: corporate.walmart.com]
B.1.7	Engaging business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AG selection of suppliers: In its 'Audits and Monitoring' website section the Company states: 'new facilities in Category 3 countries will be required to receive an audit with a Green or Yellow rating prior to producing product for sale at Walmart.' [Audits and Monitoring (website): corporate.walmart.com] • Met: HR affects AP selection of suppliers: See above [Audits and Monitoring (website): corporate.walmart.com] • Met: HR affects on-going AG supplier relationships: In its 'Audits and Monitoring' website section the Company indicates: 'Non-compliances and failure to remediate constitute grounds for consequences for suppliers and facilities, 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.' [Audits and Monitoring (website): corporate.walmart.com] • Met: HR affects on-going AP supplier relationships: See above [Audits and Monitoring (website): corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Met: Working with AG suppliers to improve performance: In its 'Promoting Responsibility' website section the Company describes some initiatives where it assist its suppliers so they 'improve transparency, empower workers and drive compliance in several key areas' such as safety, working conditions, human trafficking, etc. On example is its work to address human trafficking in the Thai seafood industry: 'Since 2015 we have engaged with the Government of Thailand, both in Washington, D.C. and in Bangkok, Thailand to clarify our expectations which include strengthening legal frameworks, industry oversight and law enforcement, and encouraging the prosecution of those involved in human trafficking. In addition, Walmart has joined the Issara Institute as a strategic partner to strengthen worker voice in Thai shrimp supply chains. Provided orientation and training to suppliers of Thai shrimp to help them monitor and improve labour conditions in their supply chains.' [Promoting Responsibility: corporate.walmart.com] • Met: Working with AP suppliers to improve performance: See above [Promoting Responsibility: corporate.walmart.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: In its Global Responsibility Report 2018 the Company resume its approach to stakeholders engagement. However it does not include a description of it identification process. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Frequency and triggers for engagement: In its Global Responsibility Report 2018 the Company describes the actions taken in order to work and engage with its stakeholders. However there is no information related to triggers or frequency. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Workers in AG SC engaged: In its Global Responsibility Report 2018 the Company discloses a list of its identified Stakeholders. Suppliers workers are not included nor trade unions. [Global Responsibility Report 2018, 2018: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Communities in the AG SC engaged: In its Global Responsibility Report 2018 the Company discloses a list of its identified Stakeholders. Communities are included. However, there is no evidence of an identification process or system. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Workers in AP SC engaged: See above [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Communities in the AP SC engaged: See above [Global Responsibility Report 2018, 2018: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in AG suppliers: On its website section 'Responsible Sourcing', the Company indicates: 'Through our Responsible Sourcing program, we set expectations of suppliers and the facilities they use, assess supply chain risk, monitor supply chain conditions through audits and investigations' [...] 'We are always looking for ways to refine our risk-based audit program. In addition to a facility's country, we may look at other variables, including industry-specific risks, supplier compliance management systems and other factors as we evaluate the risk of facilities over time.' However, this system does not include the identification of human right risks, but the identification of facilities with higher-risk non-compliances. [Responsible Sourcing: corporate.walmart.com] • Not met: Identifying risks in AP suppliers: See above [Responsible Sourcing: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Met: Example of Actions decided: On its website section ', the Company describes its conclusions and actions taken on the safety of workers in Bangladesh ready-made garment factories, as a result of an assessment: 'We are particularly encouraged by the role of training in promoting factory safety in Bangladesh. An independent assessment performed by the University of Texas Health Science Center at Houston School of Public Health found that Alliance training led to an improvement in factory workers' knowledge and awareness of fire safety, that workers have a much better understanding of fire hazards and their role in emergencies and evacuations, and that an overwhelming majority of workers liked the content and delivery of the trainings they received.', 'Factories in Bangladesh are undergoing remediation in several areas, including upgrading of electrical systems, installation or upgrading of fire suppression systems, installation of fire doors, construction of additional staircases and installation of alarm systems', 'We believe sustainable, long-lasting improvements in the global supply chain can be achieved in part through proactive programs that empower workers and build factory and supplier capacity. Capacity building programs we have helped implement in Bangladesh include: The Women in Factories Training Program [...], Environmental, Health and Safety (EHS) Academy in Bangladesh'. [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] • Not met: Including in AG supply chain [Our Commitment to the Workers of Bangladesh: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Including in AP supply chain: See above [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers • Not met: Including AP suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company's statement of ethics indicates all workers can access an anonymous and confidential global helpline (and provides a list of phone numbers per country and a website available in 14 languages). [Global Statement of Ethics: walmartethics.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: As a member of the Alliance for Bangladesh Worker Safety, Walmart's supplier facilities in Bangladesh also have access to the Alliance Helpline, Amader Kotha. On its website, it publishes monthly statistics. However, these statistics do not correspond to the Company's global grievance system, only the ones in Bangladesh. [Alliance Worker Helpline: bangladeshworkersafety.org] • Met: Channel is available in all appropriate languages: See above [Global Statement of Ethics: walmartethics.com] • Met: Expect AG supplier to have equivalent grievance systems: See above [Standard for Suppliers: cdn.corporate.walmart.com] • Met: Opens own system to AG supplier workers: See above [Walmart Global ethics website: walmartethics.com & Facility Posters: corporate.walmart.com] • Met: Expect AP supplier to have equivalent grievance systems: In its Standards for supplier the Company indicates that the suppliers have to 'provide a mechanism for workers to report concerns to management, to you, to the government, to appropriate third parties and to Walmart without fear of reprisal.' [Standard for Suppliers: cdn.corporate.walmart.com] • Met: Opens own system to AP supplier workers: The Company has an open grievance system: 'Global Ethics website' available for use worldwide by both associates and non-associates, in multiple languages. It also include in its Standards for supplier a requirement 'to post Walmart-approved posters in production facilities letting workers know what we expect of our suppliers and their facilities on topics like wages and hours, safety, fair treatment, and forced labour. The posters also provide workers with information on a number of options for raising concerns, including by contacting Walmart directly in their preferred language.' [Walmart Global ethics website: walmartethics.com & Facility Posters: corporate.walmart.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company has an open grievance system: 'Global Ethics website' available for use worldwide by both associates and non-associates, in multiple languages, including local languages for relevant

Indicator Code	Indicator name	Score (out of 2)	Explanation
	concerns from external individuals and communities		<p>locations (Chinese, Japanese, Bengali, Arabic, Hindi, Punjabi, Korean, etc.) [Walmart Global ethics website: walmartethics.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company has an open grievance system: 'Global Ethics website' available for use worldwide by both associates and non-associates, in multiple languages, including local languages for relevant locations (Chinese, Japanese, Bengali, Arabic, Hindi, Punjabi, Korean, etc.). However, the country has translated for some countries but not for all countries. [Walmart Global ethics website: walmartethics.com] • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system [Walmart Global ethics website: walmartethics.com] • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system [Walmart Global ethics website: walmartethics.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment • Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: In its Global Statement of Ethics the Company states: 'Walmart prohibits retaliation against any associate who raises a concern.' It also states as an additional responsibility for Management: 'Never retaliate against anyone for raising an ethics issue, assisting in an investigation or participating in any proceeding relating to an alleged violation of any government regulation, law or rule or alleged fraud against shareholders.' [Global Statement of Ethics: walmartethics.com] • Met: Practical measures to prevent retaliation: About its Global Ethics Helpline the Company indicates: 'The helpline is staffed by an organization not affiliated with Walmart, and to the extent possible (and in conformity with local regulations), callers may remain anonymous.' In addition 'Walmart has an established process to deal with retaliation issues. Associates who believe they have experienced retaliation after raising an ethics concern should report the issue to their manager or Global Ethics' [Global Statement of Ethics: walmartethics.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation: Although the Standard for suppliers manual includes a non retaliation policy, it only applies to workers but not other stakeholders, and it is only mentioned in regard to Voluntary labour and free association and collective bargaining. [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com & Standard for Suppliers: cdn.corporate.walmart.com] • Not met: Expects AP suppliers to prohibit retaliation: See above [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com & Standard for Suppliers: cdn.corporate.walmart.com]
C.6	Company involvement with State-based judicial and non-judicial	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remediating adverse impacts and incorporating lessons learned	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"> • Met: Describes how remedy has been provided: Although the Company did not have production at Rana Plaza at the time of the tragedy, as a member of the Alliance for Bangladesh Worker Safety, the Company has fully supported both the remediation of factory buildings to make them more safe as well as contributing to the BRAC, a global based NGO in Bangladesh, to support those affected by Rana Plaza and other disasters: ' [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: 'We recognize a need for heightened attention to fire-related risks in certain parts of the world, including Bangladesh. Our plans include re-emphasizing our standards, training suppliers and facilities and collaborating with other brands and retailers to drive industry-wide results. [...] We also conducted a separate evaluation of Bangladesh facilities focused on fire safety; factories that fell within several high-risk categories were asked to shift production to other facilities.' [Our Commitment to the Workers of Bangladesh: corporate.walmart.com] • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.2	Aligning purchasing decisions with 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"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices): The approach used by the Company is to penalize non-compliances. Positive incentives were not found. [Responsible Sourcing: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields): As a Board Member of the Seafood Task Force, the Company has participated in leading the Seafood Task Force to 'create supply chain maps' and 'establish a system to track products across the supply chain'. However, this mapping is focused only on Seafood. The Company also has a disclosure policy and guidance showing how suppliers must disclose a facility to 'Responsible sourcing' department. However, these do not seem to include farms. [Global Responsibility Report 2018, 2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its agricultural supply chain including locations. [Disclosure Policy and Guidance, April 2018: cdn.corporate.walmart.com]
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: In its 'Standards for suppliers' the Company states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Comply with all applicable laws, regulations, agreements and industry requirements relating to the employment of young workers.[...] Verify worker eligibility prior to employment. ' However, no evidence found in relation to guidelines for remediation programmes. [Standard for Suppliers: cdn.corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on child labour: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers, such as training or remediation programs. [Facility Posters: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: In its 'Standards for suppliers' document the Company' states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Take steps to recruit responsibly, including by not charging vulnerable workers recruitment or similar fees (or repaying any such fees charged), by providing migrant workers an understandable and accurate employment contract in their native language prior to departure from their home country, and by holding your agents and any labor brokers and recruiters you use to the same standards.' [Standard for Suppliers: cdn.corporate.walmart.com] <ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: Walmart is a member of the Core Group of the Leadership Group for Responsible Recruitment: 'A major cause of forced labour in today's global supply chains is the charging of recruitment fees to migrant workers. Reflecting the Dhaka Principles for Migration with Dignity, the Employer Pays Principle is a commitment to ensure that no worker should pay for a job. It is endorsed by the Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organisations driving positive change in the way that migrant workers are recruited. This Responsible Recruitment Gateway provides access to a range of tools and information to help companies move towards ethical recruitment.' This year the Company participated in the Global Forum on Responsible Recruitment and Employment which brought 'together global brands, suppliers, recruitment agencies, governments, and NGOs to discuss and examine the challenges of recruiting migrant workers, and how implementing ethical recruitment is vital in protecting workers from modern slavery as well as ensuring sustainable and efficient business operations.' [Responsible Recruitment: ihrb.org & Global Forum on Responsible Recruitment and Employment, 2018: ihrb.org] Score 2 <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: 'Allow workers freedom of movement—do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement by virtue of debts owed to you, brokers, or other third parties that cannot be reasonably repaid, and allow workers to terminate employment on reasonable notice.' [Standard for Suppliers: cdn.corporate.walmart.com] <ul style="list-style-type: none"> • Not met: How working with suppliers on free movement: The Company has co-lead the development of the Consumer Goods Forum Forced Labour Priority Principles, one of this principles is: 'Every worker should have freedom of movement. The ability of workers to move freely should not be inhibited by their employer.' [...] 'The CGF and its members will now work to uphold these practices in their own operations, and will use their collective voice to promote the adoption of these priority principles industry-wide. As part of a 2017 action plan, members will take individual actions to mainstream the Principles with an initial focus in two supply chains of particular relevance to the industry - seafood and palm oil in Southeast Asia.' However, in order to award this score, evidence of the actual work carried out by the Company is needed. On the other hand 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. [Consumer goods industry sets bar in fight against forced labour: media.theconsumergoodsforum.com & Facility Posters: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: 'Respect the rights of workers to join, form or assist a trade union, or refrain from doing so, in accordance with applicable law and practice.' Although the heading for this section reads: 'Recognize freedom of association and collective bargaining', the actual commitment does not include collective bargaining. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its Standards for Suppliers, the Company indicates: 'Cultivate a safe, clean and healthy work environment as appropriate for your industry, geography and workforce. Provide access to clean and sanitary facilities, water, and—as appropriate—dormitories and food. Implement procedures and safeguards to prevent accidents and injuries to workers, including proper maintenance, established monitoring and inspection routines, worker training and protection, fire safety measures and restrictions on hazardous work for young workers.' [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com] • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosure <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: In its Global Responsibility Report 2018 the Company describes how it engages with suppliers to improve their practices in relation with health and safety, specifically in subjects related with fire safety, as the Company it is a salient issue faced in the apparel sector. The Company was a founding member of the Alliance for Bangladesh Worker Safety, a program focus on fire safety training among other actions. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Provide analysis of trends in progress made
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts: In its Standards for Suppliers, the Company indicates: 'Maintain and comply with licenses and permits as required and appropriate for your industry, geography and facility.' However, there is no mention to requirements to have a process to identify legitimate tenure rights holders when acquiring, leasing of making other arrangements to use, with particular attention to vulnerable tenure rights holders. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in the progress made
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts • Not met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (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"> • Not met: Women's rights in codes or contracts: In its Standards for Suppliers, the Company indicates: 'Be aware of indicators of involuntary labor and actively address them, particularly where your workforce includes vulnerable populations, such as migrants, women and young people'. However, there are no guidelines related to the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment and eliminate health and safety concern that are particularly prevalent among women workers. [Standard for Suppliers: cdn.corporate.walmart.com] • Met: How working with suppliers on women's rights: The Company is implementing an initiative to buy from women-owned suppliers: Women's Economic Empowerment (WEE) Initiative. This initiative included training and supported diversity inclusion in the supply chain. In addition, the Company is quoted as the most accomplished in Women issues in Oxfam Report 'Ripe for Change': 'Walmart scored 29% for commitments it has made to sourcing from women owned companies, and to provide direct support to women in their supply chains.' [Global Responsibility Report 2018, 2018: corporate.walmart.com & Ripe for change, 2018: d1tn3vj7xz9fdh.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.2	Aligning purchasing decisions with 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"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights: The approach used by the Company is to penalize non-compliances. Positive incentives were not found. [Responsible Sourcing: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source (farm, ranch etc): As a Board Member of the Seafood Task Force, the Company has participated in leading the Seafood Task Force to 'create supply chain maps' and 'establish a system to track products across the supply chain'. However, this mapping is focused only on Seafood. [Global Responsibility Report 2018, 2018: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why: The Company has a Disclosure policy that requires suppliers to disclose its facilities to the Company's Responsible sourcing. However, no evidence found of the Company publicly disclosing a map of its apparel supply chain including locations. [Disclosure Policy and Guidance, April 2018: cdn.corporate.walmart.com]
D.2.4.b	Child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: In its 'Standards for suppliers' the Company states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Comply with all applicable laws, regulations, agreements and industry requirements relating to the employment of young workers.[...] Verify worker eligibility prior to employment. ' However, there is no guidelines related to remediation programmes. [Standard for Suppliers: cdn.corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on child labour: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers, such as training or remediation programs. [Facility Posters: corporate.walmart.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: In its 'Standards for suppliers' document the Company states: 'Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked or indentured labor—from your operations and supply chain.[...] Take steps to recruit responsibly, including by not charging vulnerable workers recruitment or similar fees (or repaying any such fees charged), by providing migrant workers an understandable and accurate employment contract in their native language prior to departure from their home country, and by holding your agents and any labor brokers and recruiters you use to the same standards.' [Standard for Suppliers: cdn.corporate.walmart.com] <ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: Walmart is a member of the Core Group of the Leadership Group for Responsible Recruitment: 'A major cause of forced labour in today's global supply chains is the charging of recruitment fees to migrant workers. Reflecting the Dhaka Principles for Migration with Dignity, the Employer Pays Principle is a commitment to ensure that no worker should pay for a job. It is endorsed by the Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organisations driving positive change in the way that migrant workers are recruited. This Responsible Recruitment Gateway provides access to a range of tools and information to help companies move towards ethical recruitment.' This year the Company participated in the Global Forum on Responsible Recruitment and Employment which brought 'together global brands, suppliers, recruitment agencies, governments, and NGOs to discuss and examine the challenges of recruiting migrant workers, and how implementing ethical recruitment is vital in protecting workers from modern slavery as well as ensuring sustainable and efficient business operations.' [Responsible Recruitment: ihrb.org & Global Forum on Responsible Recruitment and Employment, 2018: ihrb.org]
D.2.5.d	Forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: 'Allow workers freedom of movement—do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement by virtue of debts owed to you, brokers, or other third parties that cannot be reasonably repaid, and allow workers to terminate employment on reasonable notice.' [Standard for Suppliers: cdn.corporate.walmart.com] <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company has co-lead the development of the Consumer Goods Forum Forced Labour Priority Principles, one of this principles is: 'Every worker should have freedom of movement. The ability of workers to move freely should not be inhibited by their employer.' [...] 'The CGF and its members will now work to uphold these practices in their own operations, and will use their collective voice to promote the adoption of these priority principles industry-wide. As part of a 2017 action plan, members will take individual actions to mainstream the Principles with an initial focus in two supply chains of particular relevance to the industry - seafood and palm oil in Southeast Asia.' However, in order to award this score, evidence of the actual work carried out by the Company is needed. On the other hand 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. [Consumer goods industry sets bar in fight against forced labour: media.theconsumergoodsforum.com & Facility Posters: corporate.walmart.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: In its 'Standards for suppliers' document, the Company indicates: 'Respect the rights of workers to join, form or assist a trade union, or refrain from doing so, in accordance with applicable law and practice.' Although the heading for this section reads: 'Recognize freedom of association and collective bargaining', the actual commitment does not include collective bargaining. [Standard for Suppliers: cdn.corporate.walmart.com] • Not met: How working with suppliers on FoA and CB: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its Standards for Suppliers, the Company indicates: 'Cultivate a safe, clean and healthy work environment as appropriate for your industry, geography and workforce. Provide access to clean and sanitary facilities, water, and—as appropriate—dormitories and food. Implement procedures and safeguards to prevent accidents and injuries to workers, including proper maintenance, established monitoring and inspection routines, worker training and protection, fire safety measures and restrictions on hazardous work for young workers.' [Standard for Suppliers Manual (no longer valid), 2014: cdn.corporate.walmart.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: In its Global Responsibility Report 2018 the Company describes how it engages with suppliers to improve their practices in relation with health and safety, specifically in subjects related with fire safety, as the Company it is a salient issue faced in the apparel sector. The Company was a founding member of the Alliance for Bangladesh Worker Safety, a program focus on fire safety training among other actions. [Global Responsibility Report 2018, 2018: corporate.walmart.com] • Not met: Provide analysis of trends in progress made
D.2.8.b	Women's rights (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"> • Not met: Women's rights in codes or contracts: In its Standards for Suppliers, the Company indicates: 'Be aware of indicators of involuntary labor and actively address them, particularly where your workforce includes vulnerable populations, such as migrants, women and young people'. However, there are no guidelines related to the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment and eliminate health and safety concern that are particularly prevalent among women workers. [Standard for Suppliers: cdn.corporate.walmart.com] • Met: How working with suppliers on women's rights: The Company is implementing an initiative to buy from women-owned suppliers: Women's Economic Empowerment (WEE) Initiative. This initiative included training and supported diversity inclusion in the supply chain. In addition, the Company is quoted as the most accomplished in Women issues in Oxfam Report 'Ripe for Change': 'Walmart scored 29% for commitments it has made to sourcing from women owned companies, and to provide direct support to women in their supply chains.' [Global Responsibility Report 2018, 2018: corporate.walmart.com & Ripe for change, 2018: d1tn3vj7xz9fdh.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> Not met: Working hours in codes or contracts: The Company's Standards for suppliers includes working hours guidelines: 'Comply with all applicable laws and agreements regarding compensation and working hours. Provide compensation, benefits, working hours, breaks, rest days, holidays and leave that comply with legal requirements and applicable agreements. Help workers understand these terms.' However there is no direct reference to international laws, so it is not clear whether international conventions related with working hours are included in this guidelines. [Standard for Suppliers: cdn.corporate.walmart.com] Not met: How working with suppliers on working hours: The Company provides posters to its suppliers to let workers know what it expects of its suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced labor. However the posters do not clarify what the law say in reference to working hours, and there is no further information about the actual work the Company is doing with its suppliers. [Facility Posters: corporate.walmart.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Area: discrimination Headline: Two former Wal-Mart employees filed a class action lawsuit in federal court in Illinois alleging that the Company refused to treat pregnant women like other disabled workers, as federal and state laws require. Sources: Company website - abetterbalance.org Allegation: On May 2017, two former Wal-Mart employees filed a class action lawsuit in federal court in Illinois alleging that the Company refused to treat pregnant women like other disabled workers, as federal and state laws require, according to Reuters. One of the plaintiffs said she was fired after being injured carrying a heavy tray on the job and inquiring about the Company's policy toward pregnant workers. while another stated that she was reprimanded for asking co-workers to do heavy lifting for her, forced to go out on unpaid leave and paid USD 2.00 an hour less when she returned to work. <p>The workers claim that until 2014, the Company's policy denied pregnant workers the same accommodations as other disabled employees in violation of a federal law requiring employers to treat pregnancy as a temporary disability and make appropriate adjustments. Nearly 50,000 female workers might have been affected by Wal-Mart's former policy.</p>
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public response available: In a statement the Company denied the women's claims and said Wal-Mart's pregnancy policies "have always fully met or exceeded both state and federal law." The Company reported that a separate anti-discrimination policy it maintains has long listed pregnancy as a protected status. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised: The Company's statement of ethics explicitly prohibits discrimination. In addition to Company operations, it applies to 'all suppliers, consultants, law firms, public relations firms, contractors and other service providers'. In addition, it has put in place initiatives related to empowering women but has not committed to respecting women's rights. Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> Not met: Policies address the specific rights in question: In October 2017, Walmart revised its policies to allow employees who are pregnant, breastfeeding or recovering from childbirth to ask for job adjustments, reasonable accommodations or a temporary transfer to a different position. It has not however, provided information on 'points' lost or not by employees not able to finish a shift if they have to be taken to hospital.
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Denies allegations, but has engaged affected stakeholders: The company denies the allegations

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Denies allegations, but reviewed systems to prevent such impacts Score 2 • Not met: Denies allegations, but implements review recommendations
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Health and safety • Headline: Rana Plaza building collapsed in Savar, near Dhaka, Bangladesh, killing 1,138 people and injuring thousands more • Sources: The Guardian, 23/05/2014 - theguardian.com BBC News, 03/05/2013 - bbc.com and bbc.com Clean Clothes Campaign website, 15/09/2014 - cleanclothes.org and cleanclothes.org and corporate.walmart.com and cleanclothes.org and nytimes.com and washingtonpost.com • Allegation: On 24 April 2013, the Rana Plaza building collapsed in Savar, near Dhaka, Bangladesh, killing 1,138 people and injuring thousands more. Though the company claims that at the time of the collapse it did not have suppliers housed in the building, there is evidence that links the company to a factory. According to the Washington Post 'Documents provided by the Worker Rights Consortium show that merchandise bound for Wal-Mart was produced at Ether Tex, a factory located inside Rana Plaza. One purchase order shows "skinny fit" women's and girls' jeans were to be produced for the fall 2012 season'. <p>The day before the accident the Rana Plaza was shut down as cracks were found in the buildings structure. On the morning of the accident, shops and banks on the ground floor remained closed, while factory workers were called back to work despite the apparent safety risk. A lawsuit against Wal-Mart and other companies was filed in 2015 by relatives of deceased claiming that that the retailers knew "that Bangladesh factories had an extremely poor record of workplace safety standards and industrial building standards, including garment factories."</p> <p>On April 2015, an injured worker and a man whose wife died in the Rana Plaza collapse sued Wal-Mart Stores and other retailers. The plaintiffs claim that the retailers knew "that Bangladesh factories had an extremely poor record of workplace safety standards and industrial building standards, including garment factories."</p> <p>On May 2016, the lawsuit was dismissed with the judges agreeing with the company's claim that 'the plaintiffs had failed to establish that the US companies owed a duty of care to the workers, who were directly employed by the garment factory, not the retailers'. Another reason for dismissing the case was because it was filed after the one-year deadline applicable under Bangladeshi law had expired. However, according to CHRB methodology, this still qualify as search for remedy.</p>
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"> • Met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company has responded publicly to the allegation. <p>In response to the allegations linking the Company to the Rana Plaza the Company stated 'The production described in these documents was from a year ago, and based upon our policy on unauthorized subcontracting we are terminating this supplier,' Wal-Mart statement said. "This supplier, Fame Jeans, had told us there was no previous production at Rana Plaza, but our suppliers have a binding obligation to disclose all factories producing Wal-Mart merchandise.'</p> <p>The Company reports 'during Phase 1, a team of experienced engineers from BV conducts an initial safety risk assessment focusing on issues that pose immediate risk to worker safety. In Phase 2, BV conducts detailed electrical and building safety risk assessment with the goal of identifying safety issues. The building safety section of the Phase 2 report includes a visual assessment of the building for evidence of the following: structural distress, compliance with local laws regarding evacuation routes, fire detection systems, and fire response elements, building design and construction and permitting. A report from an approved civil engineer proving that the factory has resolved the structural integrity issues is also required for factories where issues have been identified. During Phase 3, an engineering team from BV returns to the factory to verify that the required remediation from Phase 2 was made. Following this assessment, BV will issue a follow-up report outlining the factory's progress and key issues that are still in the process of being remediated. During Phase 4, an independent inspector from BV will return to the factory to verify that the outstanding issues identified have been addressed'.</p>

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			As part of its Enhanced Global Standards the Company 'instituted a zero-tolerance policy for unauthorized subcontracting. Any facilities subcontracting sourcing of Walmart merchandise to an undisclosed or unauthorized facility are subject to being classified as red-failed in our system and may be permanently barred from sourcing merchandise to Walmart for all retail markets'.
E(2).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has a supply chain labour standards policy that covers health and safety.
E(2).3	The Company has taken appropriate action	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The company is a founding member of the Alliance for Bangladesh Worker Safety. which engaged with affected stakeholders, including the Government, labor, and the Bangladesh Garment Manufacturers and Exporters Association (BGMEA) • Not met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders • Met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: According to the company 'Walmart and the Walmart Foundation together contributed \$3 million to BRAC, a global NGO based in Bangladesh, to support those affected by Rana Plaza and other disasters. From that donation, \$1 million was contributed to the Rana Plaza Donors Trust Fund'. Though in the past there were claims around the level of its contribution, the Fund has reached its target of \$30 million. • Met: Has improved systems and engaged affected stakeholders: The Company has management systems in place which includes auditing suppliers, producing corrective action plans and supplier capacity building. <p>The Company can demonstrate that it has worked with its suppliers in the country of the allegation to reduce the probability of a reoccurrence of the breach – the Company has joined the Bangladesh Alliance for Worker Safety and has provided details of how it is improving safety at supplier operations. The Company has carried out independent safety inspections of all suppliers and made details of these public. Safety training is provided to suppliers employees and the Company has strengthened its policy on illegal subcontracting.</p>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Forced labour • Headline: Walmart Supply chain alleged to be involved in slavery, human trafficking and forced labour in Thailand • Sources: theglobeandmail.com and bbc.com and theguardian.com and apnews.com Forbes, 14/12/2015 - fortune.com • Allegation: In 2015 an investigative report by the Associated Press alleged slavery, human trafficking and forced labour at shrimp peeling facilities in Thailand that supply major supermarkets including Wal-Mart, Kroger, Whole Foods, Olive Garden a subsidiary of Darden Restaurants, and the retailer Dollar General. <p>The investigation focused on the Gig Peeling Factory in Samut Sakhon, which supplies the second largest Thai sea food supplier Thai Union as well as others, but makes clear there are other peeling sheds that also illicitly supply major exporters.</p> <p>Employees at the Gig Peeling Factory were alleged to be migrant workers and children and were reportedly subject to human rights abuses including being beaten, detained, trapped, forbidden to talk with colleagues and forced to work 16-hours a day sometimes without pay. Most workers were migrants from Burma without visas or work permits, it was reported. They were sold by a broker with promises of well-paid jobs, but expected to pay their debt to the employer (the purchaser) or the boat owner. When complaining, employees are alleged to be threatened because of their illegal status. Documented migrants were also vulnerable because their employer held on to identification papers so they could not leave.</p>
E(3).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The Company has responded through the press stating that they were looking into the issue and adding: 'we are aware of the Associated Press story, and we were horrified by the conditions and treatment of workers the reporters uncovered.'

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Response goes into detail
E(3).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved Score 2 • Met: Policies address the specific rights in question: The Company has a standard for suppliers manual which sets out the expectations that suppliers need to respect the rights related to non-discrimination, child labour, freedom of association and collective bargaining, forced labour, health and safety and working hours.
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(4).0	Serious allegation No 4		• Area: Forced labour • Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them • Sources: Huffington Post, 21/11/2017 - huffingtonpost.com USA Today, 16/06/2017 usatoday.com Naples daily News, 30/06/2017 eu.democratandchronicle.com Naples Daily News, 09/01/2018 eu.naplesnews.com USA Today, 09/01/18 - eu.usatoday.com • Allegation: A 2017 investigation by USA Today alleged that truck drivers in the US supply chain for retailers including Costco (Target and Home Depot) were often trapped in debt bondage and worked in conditions equivalent to forced labour. Specifically the drivers were said to be pressed into leasing trucks they could not afford, forced as a result to drive for up to 20 hours a day for pay that "sometimes drops to pennies on the hour", before being fired and having their vehicles taken, without compensation for the money the drivers had paid towards buying them. In 2018, the city of Los Angeles filed three lawsuits against some of the trucking companies named in the report.
E(4).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response available: According to a press article, Walmart 'pledged in a letter responding to senators that it would cancel contracts with any trucking company that did not provide "assurances" it was following fair labor practices'. Score 2 • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The Company has a standard for suppliers manual which sets out the expectations that suppliers need to respect the rights related to non-discrimination, child labour, freedom of association and collective bargaining, forced labour, health and safety and working hours. However, a policy on bonded labour specifically was not found. • Met: Policies apply to the type of business relationships involved Score 2 • Not met: Policies address the specific rights in question
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(5).0	Serious allegation No 5		• Area: Health and safety • Headline: NGO claims unpaid compensation to victims four year after Aswad mill fire • Sources: Clean Clothes Campaign, 08/10/2017 - cleanclothes.org Clean Clothes Campaign, 26/05/2014 cleanclothes.org The Financial Express, 14/10/2013 -

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			<p>print.thefinancialexpress-bd.com Sunday Age, 05/01/2014 Bangladesh Accord website, 29/07/2014 The Guardian, 09/10/2013 The Star, 10/10/2013 - thestar.com.my</p> <ul style="list-style-type: none"> Allegation: On 8 October 2013, at least seven workers died and more than 50 were injured in a fire at the Aswad Composite Mills factory in Gazipur, near Dhaka in Bangladesh. The factory manufactured fabric for several brands, including the Company. The factory was supplying fabric for the Company. Following the accident, it was reported that the Aswad factory had been issued with a formal notification by the Bangladeshi government that the building was unsafe for work a week prior to the fire. The government's inspection report raised nine violations with the factory, stating that the building was 'dangerous to human life and security' and that the 'fire extinguishers and other fire safety equipment were not maintained in an appropriate manner.' In addition, there were an inadequate number of exhaust fans and fire extinguishers, as well as poor measures to cool down the heat originating from the machines, and obstacles to movement due to clogged passages. The Bangladeshi government said it would be filing criminal charges against the factory's owners. The families of those killed have been paid BDT 700,000 (GBP 6,750) in compensation, from both Palmal and the Bangladesh Garment Manufacturers and Exporters Association. The NGO Clean Clothes Campaign has criticised the amount of compensation offered by Palmal, saying it was insufficient to support the families of the deceased and injured workers. In 2017, marking four years after the fire, the Clean Clothes Campaign reiterated a call for better compensation.
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: Score 1</p> <ul style="list-style-type: none"> Met: Public response available: The Company has responded a the tie through the press. An article stated that 'Wal-Mart Stores Inc spokesman Kevin Gardner confirmed in an email that some of its suppliers source fabric from the mill where the fire broke out but noted that Wal-Mart does not have a direct contractual relationship with Aswad. Gardner said that Wal-Mart has a safety program in place to inspect the factories that produce its garments, but that the program does not extend to the facilities that make the materials for those garments'. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Response goes into detail
E(5).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> Met: Policies address the specific rights in question: The Company has a supply chain labour standards policy that covers health and safety.
E(5).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Not met: Engages with affected stakeholders Not met: Encourages linked business to engage affected stakeholders Not met: Provides remedies to affected stakeholders Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> Not met: Remedies are satisfactory to the victims Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.28 out of 4	Out of a total of 53 indicators assessed under sections A-D of the benchmark, Wal-Mart Stores made data public that met one or more elements of the methodology in 17 cases, leading to a disclosure score of 1.28 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows: Score 2</p> <ul style="list-style-type: none"> Met: Company reports on GRI: According to its Global Sustainability Report 2017, the Company reports to the GRI. [Commitments & GRI, 2017: corporate.walmart.com] Not met: Company reports on SASB Not met: Company reports on UNGPRF

Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0 out of 4	<p>Wal-Mart Stores met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

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

See the 2018 Key Findings report for more details of the research process.

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