GLOBAL ETHICS & COMPLIANCE



SUPPLIER REQUIREMENTS FOR SUPPLY CHAIN TRACEABILITY

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Introduction

Supplier transparency about the facilities used to manufacture products for Walmart Inc. ("Walmart") is a foundational aspect of Walmart's Global Ethics & Compliance program. As a supplier, you are responsible for complying with Walmart's <u>Standards for Suppliers</u> (Standards) and all applicable laws in your business operations and throughout the supply chain of the products you sell to Walmart. Your responsibility for upholding our Standards extends to your suppliers, subcontractors, agents, and in the upstream production or processing of components, raw materials, or ingredients used in the products you sell to Walmart. The intent of this document is to establish expectations that you document your production and procurement processes, maintain strong management systems for gaining supply chain transparency, and manage compliance in higher-risk upstream supply chains.

Please consult with your <u>Responsible Sourcing</u> <u>Compliance team member</u> if you have any questions.



Expectations

Suppliers are accountable for compliance with Walmart Standards for Suppliers in their business and throughout the process of providing products to Walmart. To comply with Walmart's expectations on supply chain traceability, a supplier should:

- 1. Have management systems and compliance programs in place that mitigate relevant compliance risks throughout the supply chain of the products you sell to Walmart, including:
 - a. Have your Code of Conduct aligned to Walmart's Standards for Suppliers embedded in or referenced as part of contracts with all of your suppliers, including contract manufacturers and component, raw material, and ingredients suppliers in your supply chain.
 - b. Have controls in place to ensure that the organizations and entities involved in the supply chain are not subject to sanctions, withhold release orders, or otherwise prohibited by the markets the products are produced in or distributed to.
 - c. Active monitoring of withhold release orders, import requirements, sanctions, and other regulatory requirements to ensure continued compliance with Walmart's Standards for Suppliers.
 - d. Processes to identify areas of potential risk of non-compliance with Walmart standards in their supply chain, including the risk of forced or underaged labor and other human rights abuses.
 - e. Programs to mitigate these risks, including requiring relevant certifications, audits, investigations, and other means as appropriate.
- 2. Know each stage and location of the production process from raw materials through delivery of products to Walmart custody for each raw material, component, or ingredient which may be impacted by import restrictions, legal prohibitions, or that are of increased risk of forced or underaged labor or other human rights abuses that would constitute a violation of Walmart's Standards for Suppliers.

Expectations

- 3. Document the name, address, business license, contact information, and production processes for each location.
- 4. Identify and provide evidence outlining the chain of custody for all components and ingredients utilized in the production process.
 - a. The chain of custody should track components and ingredients at each stage of the production process from raw material origin to final product transformation.
 - b. Documents should include but are not limited to transportation records, bills of lading, production records, purchase orders, certificates of origin, and component and ingredient bills of materials and invoices (as available).
 - c. The supplier should retain these documents for six years from the last purchase order date and provide them to Walmart upon request.
- 5. Sufficiently document and make available records of supply chain steps, organizations, and compliance programs such that they can be audited by third parties or Walmart upon request.

Please consult with your <u>Responsible Sourcing Compliance team member</u> if you have any questions.

Definitions

Suppliers: Entities providing products to Walmart, including goods for resale and for Walmart's own use.

Walmart's Standards for Suppliers: Document that applies Walmart's values to our relationships with suppliers.

Supply Chain: All the organizations and activities involved in delivering a product to Walmart, including but not limited to the production, distribution, aggregation, processing, and augmenting of raw materials, components, or ingredients and the production of the final product and distribution to Walmart custody.

Business License: Permits issued by a government agency allowing individuals or companies to conduct business within the government's geographical jurisdiction.

Chain of Custody: The chronological documentation that records the sequence, custody, control, transfer, analysis, and disposition of materials in the supply chain.

Bill of Lading: A document issued by a carrier that lists goods being shipped and specifies the terms of their transport.

Bill of Materials: A document listing all the materials required to produce a range of products, including all the components and their relevant quantities, the order in which they are assembled, and the work centers that perform the assembly.

Purchase Order: Walmart's authorization to formalize a purchase transaction with a supplier.

Production Record: Records that show the amount of product produced or processed by manufacturing line and date.

Certificate of Origin: A document containing an affidavit to prove the origin of imported goods.

Transportation Records: Records identifying the quantity of materials and corresponding dates the materials entered and exited production and processing locations.

Code of Conduct: A statement setting out guidelines regarding the ethical principles and standards of behavior expected by an organization.

Please consult with your <u>Responsible Sourcing</u> <u>Compliance team member</u> if you have any questions.

Supplier Requirements for Supply Chain Traceability