Ethics and Integrity

WHAT DID WE ACHIEVE TOGETHER?

Act under the highest standards of integrity, being a responsible, trustworthy, ethical and transparent corporate citizen.

21,051

on our Code of Conduct

20,706

Associates completed Train:

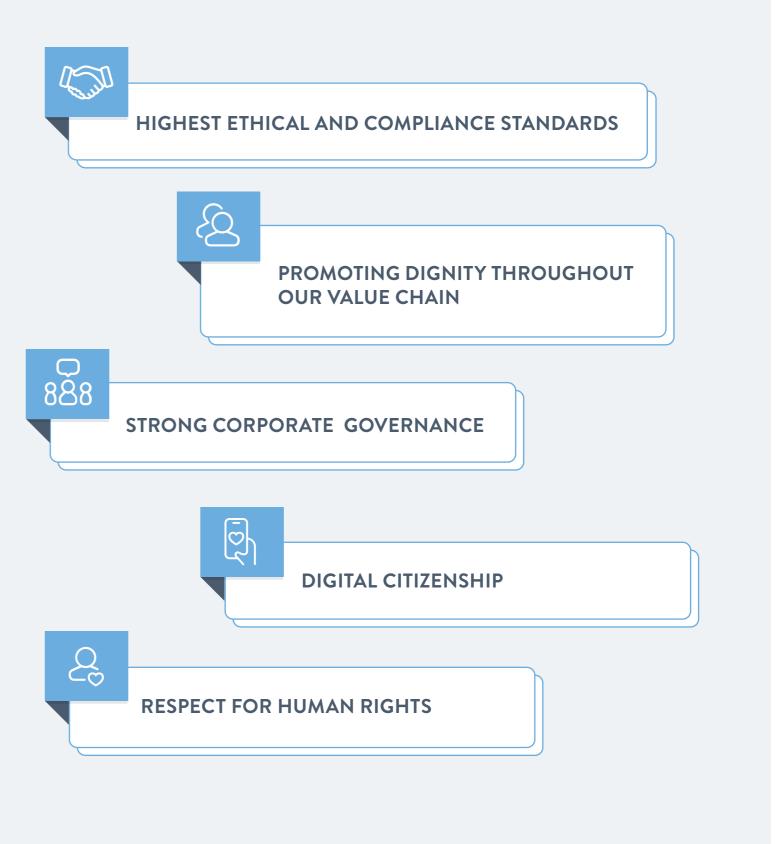




ETHICS AND COMPLIANCE

The way we operate our business is as important as the products and services we offer to our customers, so we act in an ethical and honest manner to promote our stakeholders' well-being







ETHICS AND COMPLIANCE

GRI, 2-27, SASB FB-FR-310A.4, CG-MR-310A.3, CG-MR-330A.2, FB-FR-310A.3

2022 represented a year of transformations and adjustments to new ways of interacting. The face-to-face and virtual worlds now coexist to meet today's needs. This quickly led to the creation of new legislations and social behaviors that were recognized and incorporated into our day-to-day work in all Ethics and Compliance programs.

We invest in strategies, protocols, procedures and methodologies that drive efficient results in our services and products. However, we know that our greatest strength is our 623 associates who, thanks to the leadership, vision and guidelines of a robust work under the standards of Ethics and Compliance in Mexico and Central America, continue to achieve improved results. Teamwork, observation, dialogue and innovation are achieved with unique people working as a team and with discipline.

Every year, we ensure that our programs are aligned with our commitments, values and principles

Fundamentals of Ethics and Compliance

Walmart's Ethics and Compliance program is riskbased and suited to serve our global business. Our Ethics and Compliance program is designed around key principles to remain consistent and responsive as our business and external environment changes.

1. Corporate Culture

The foundation of Walmart's Ethics and Compliance program is a strong corporate culture. We promote behaviors and decision-making consistent with our core value of acting with integrity, including assessing our culture and recognizing integrity in action.

4. Policies, Procedures and Controls

We implement formal written policies to clearly describe the company's expectations on how we conduct business and what we expect from suppliers and third parties. We reinforce these expectations through the design and execution of risk-based controls.

7. Confidential Reporting

We maintain reporting mechanisms that allow for anonymous and confidential reporting from all levels of associates, third parties, employees in our supply chain and other external sources.

2. Compliance Leadership and Staff

reference in the industry

Our Global Ethics and Compliance Leader has overall responsibility for the implementation and maintenance of our Ethics and Compliance program, alongside experts from different areas, market and business unit leaders.

We are a company that privileges transparency

and integrity in everything we do, which makes

us a leading and innovative company, as well as a

3. Regular Risk Identification and Analysis

Our Ethics and Compliance program continually reviews and assesses compliance-related risks. We also consider data to identify risks and noncompliant behavior.

5. Training and Communication

Educating associates, directors and high-risk business partners about our behavioral expectations and key policies and procedures is essential to our Ethics and Compliance program.

6. Internal Monitoring and Evaluation

We also regularly monitor and evaluate our controls and communicate with our business partners regarding effectiveness. Internal monitoring and evaluation procedures, supplemented by periodic audits, help ensure that the components of our program are operating effectively and are well designed.

8. Investigation and Remediation

Prompt investigation, root cause and corrective action analysis are central to the effectiveness of our Ethics and Compliance program.

9. Continuous Improvement

We continually work to improve and adapt our Ethics and Compliance program to mitigate new and evolving risks, including by teaming with other business partners to design and integrate compliance into their new initiatives and acquisitions.



In our company we have teams that visit and supervise our facilities. Our team aims to verify the levels of compliance that our environment demands and expects. For us, it's not just about what we achieve, but how we achieve it.







Mexico

5,772

monitoring activities of different

compliance programs in operating units

New Food safety

241 654

Remodeled Monitoring of pests

117

524

Pharmacies Other

1,468 2,459

Treatment plants Total visits made for mitigation and projects

742

Central America

1,947

monitoring activities of different compliance programs in operating units

New openings Remodeled units Pharmacies plants

78 65 387

Food Monitoring of pests Other

619

82

1,030

TOTAL VISITS MADE

Major Mitigation and maintenance Surveying projects

43 28 34

In our company, one of our central axes that materializes our ethical commitment is the implementation of several compliance programs that cover our entire value chain



Areas that comprise the Ethics and Compliance program



Health and Safety



Environment



Labor and Employment



Ethics



Health and Wellness



Foreign Trade



Anticorruption



Prevention of Money Laundering



Antitrade



Food Safety



Licenses and Permits



Responsible Supply



Privacy



Product Safety



Consumer Protection

Below, we outline some highlights of the 2022 Ethics and (ompliance programs





Health and Safety

GRI 403-1, 403-2, 403-3, 403-4, 403-5, 403-7, 403-8, 403-9, 403-10

During 2022, one of our greatest successes was the reduction of customer accidents in Mexico and Central America. While returning to face-to-face operations generated a significant increase in the number of customers in our stores, we were prepared and ready to take actions to prevent risks and accidents.

This year, we launched **Zero Accidents** cards in our formats, something we had already successfully tested in our Distribution Centers. Associates in stores use these cards to identify unsafe conditions or actions. Every card raised is one less risk for associates and customers.

We are focused on taking care of our customers and associates to provide them with a safe place to shop and work

150,871 cards reported



8,534
associates are members of the Health and Safety Committee

5,187Mexico

3,347
Central America

We are focused on achieving our zero accidents goal. Today, we have hundreds of stores that have already achieved zero accidents during the year. There is still much to do, but every day we take one step closer to fulfilling our mission.

ACCIDENTS KPIS

| | | | Mexic | 0 | Cent | Central America | | |
|-------------------------------------|-------|-------|-------|-------|------|-----------------|--|--|
| | 2020 | 2021 | 2022 | 2020 | 2021 | 2022 | | |
| Work-related injuries | 5,811 | 5,464 | 5,051 | 768 | 718 | 517 | | |
| Disabling injuries per hours worked | 2.18 | 1.96 | 1.87 | 1.674 | 1.56 | 1.13 | | |
| Customer accidents | 651 | 767 | 693 | 156 | 168 | 155 | | |

Disabling injuries per hours worked = Disabling injuries (200,000)/ Total hours worked

Training on fire outbreak reduction

In Central America, we achieved a 13% reduction in the risk of fire outbreaks vs. 2021

As we continue to reinforce this action year after year, confidence in the safety of our stores for shopping and working is also strengthened. This achievement is due to the implementation of controls and monitoring by the teams, correcting the opportunities detected.



-27.40%

reduction in associate accident and **-20.97%** of customers in Central America vs. 2021

1,048 stores and clubs

stores and clubs in Mexico with Zero
Accidents

-4.50%

reduction in associate accidents and **-15.00%** of customers in Mexico vs. 2021



Mexico



Health and Safety

Zero Accident Contractor Program

With our Zero Accident program, we are focused on the protection and care of our suppliers. The identification of potential risks together with the constant implementation of protocols, training and monitoring is something we are working on to continue strengthening this program. In 2022, we reinforced our strategy based on four main key actions ranging from immediate action to contain a risk, to the implementation of a plan with long-term results.

Key actions

1. Skills upgrading

for safety supervisors, red helmets, and for the construction management team.

2. New supplier development

ETHICS AND COMPLIANCE 10/1

safety assessment for new companies that will provide construction services.

Likewise, we hold safety meetings with our suppliers, and we call the suppliers with the most accidents and work in progress to request action plans from them.

3. Continuous performance evaluation for contractors

this is carried out considering the performance on site and the accident record.

4. Safety leadership

the construction management team monitors construction sites with a selfassessment form and sets an example by following safety rules, being continuously trained and evaluated. Safety begins with the leadership example.

Standardization process and generation of safety procedures

As part of the process to generate greater culture and awareness towards safety. during 2022 new visual safety standards or One Point Lessons (LUP's for its acronym in Spanish) were updated and created, with the aim of reinforcing safety controls in a clear and standarized manner.

Through the LUPs, we explain guidelines and controls in a simple way, such as: safe unloading, safe use of machines, rules for the use of ladders, permits for hazardous work, handling of merchandise on the sales floor, safe use of blades, use of PPE. among others.

In Mexico, we launched the high-risk machine operation certification program, starting with tortilla equipment in 2022



We also launched the hazardous work certification program for our maintenance teams, strengthened our red helmet and contractor control program, and reinforced safety communications to third parties.



Central America Health and Safety



Safe Family Program



accidents under the motto "Juntos nos Cuidamos" ("Together we take care of

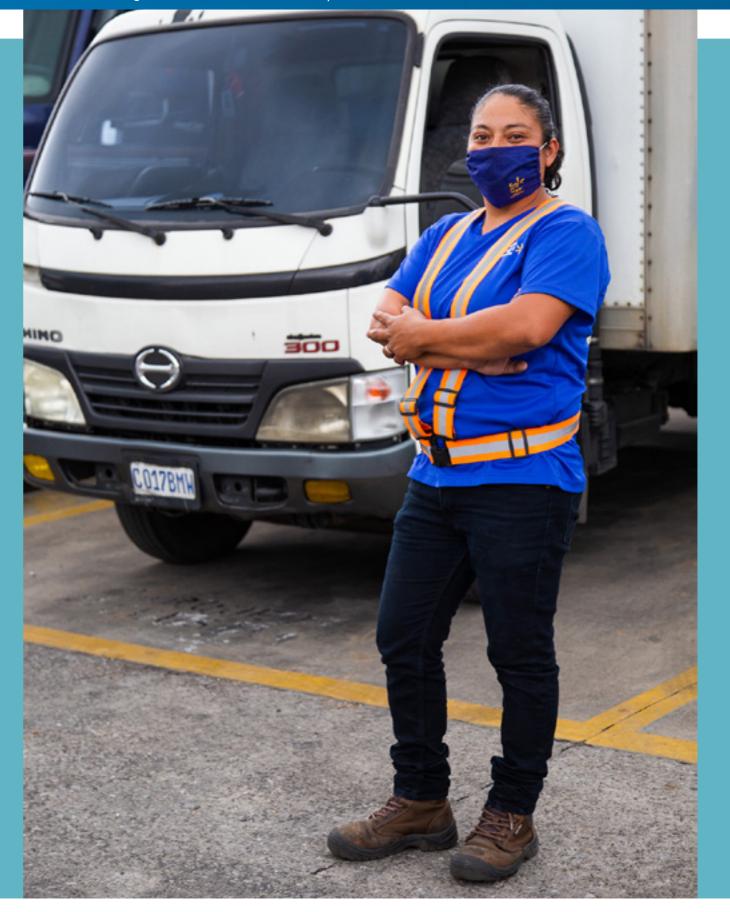




safe behavior observation records

We managed to get **3,163** associates to voluntarily start the modules, while **1,394** of them successfully completed Module 1 and continue their safety culture certification process.





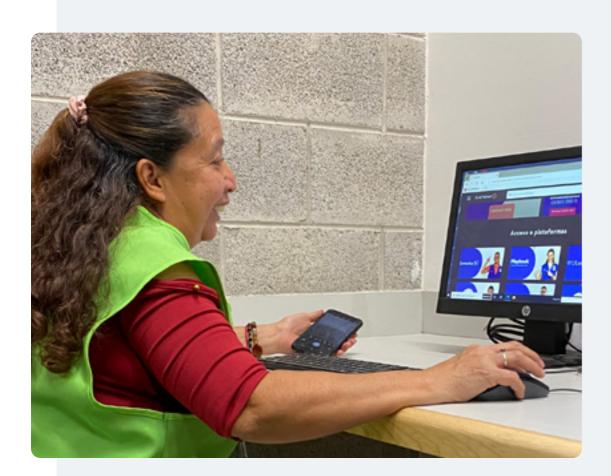




Ethics

During 2022, we continued to promote our Code of Conduct, launched in 2021, as a key tool for success

Undoubtedly, our business is as important as the products we sell and the services we provide based on ethical, transparent and reliable conduct.



This year, we continued with different actions in Mexico and Central America that help our associates maintain a culture of integrity:

Annual Training

In Mexico we imparted 17,308 hours of training on our Code of Conduct to the Operations and Staff associates, covering 97.54% and 95.77% respectively. In Central America, we imparted 3,743 hours, covering 94% of the company's associates.

Integrity in Action Award

Every year we make a global recognition that honors associates who **exemplify our values and define our culture of integrity** every day.

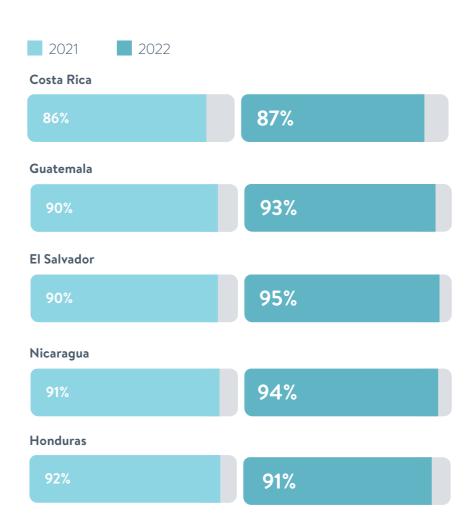
WalmartEthics.com

Through this platform, which is available in 11 languages and globally accessible, stakeholders can ask questions, read our **Code of Conduct**, report ethical concerns and follow up.

Integrity Index

The Integrity Index is composed of six questions that are included in the annual associate survey. This year, the Index increased in Mexico from 82% in 2021 to 86% in 2022.

Particularly, in **Central America** there was an increase from **90% in 2021** to **91% in 2022.**







Ethical Case Management

We have centralized local research teams. achieving great improvements in efficiency, consistency, protocol tracking and information processing.

Presence in Strategic Forums

We conveyed key messages about integrity matters in forums such as the Year Beginning Meeting (JIA, for its acronym in Spanish), Year-End Meeting (JUFA, for its acronym in Spanish), Annual Executive Session and Compliance Tour.

Communication Campaigns

We disseminated strategic communications to associates on relevant ethical topics to strengthen the culture of integrity, addressing issues such as Integrity builds trust, Confidence to report concerns, Retaliation, Conflict of interest, Bribery, Prevention of sexual harassment and discrimination. Prevention of fraud and dishonesty.

Alignment with Suppliers

We conveyed messages about Walmart's culture of integrity to external suppliers through initiatives such as ExpoWalmart and the dissemination of a virtual ethical poster.

Integrity for Leadership Series

We shared positive leadership capsules with the organization's leaders focusing on integrity issues that were cascaded by level down to hourly associates, addressing topics such as Trust to report concerns and Acting ethically and honestly.



GRI 2-16

Being transparent involves not only talking about our accomplishments - it is also ethical to detect our areas of opportunity

To this end, our stakeholders have access to different channels for reporting their concerns. This allows us, on one hand, to detect non-compliance with our Code of Conduct, which is forcefully eradicated, on the other hand, to prevent potential risks affecting our stakeholders or environment. The mechanisms for reporting their concerns are the following:

Open door communication

with the direct leader, next level leader, People, Ethics and Compliance or Legal leader

Website

http://www.walmartethics.com

email

ethics@walmart.com

Mexico and Central America Ethics Line

available 24 hours a day, every day of the week

Costa Rica

0800 542 5443

Guatemala

1800 835 0377

Honduras

800 2220 0141

El Salvador

800 6126

Land and mobile lines

800 384 22

For IP calls only

001 800 2201 967

Landlines only

505 2248 2275

All lines, Additional cost call

Mexico

800 963 8422



Actions and Policy



GRI 2-15, 205-3, 406-1

Actions taken derived from reported ethical cases

All confirmed cases result in a disciplinary action ranging from a reprimand to termination of employment.



In addition to the findings identified in such cases, remediation measures are implemented in coordination with the business areas, including training, process improvements, policy publication and modification, communication reinforcement, among others.

Global Harassment and Discrimination Prevention Policy

It establishes guidelines that strictly prohibit all forms of discrimination and harassment.

Global Conflict of Interest Policy

It establishes how our associates should act, taking into account the company's interests and exercising good judgment, without considering personal interests or situations that may affect their objectivity to make decisions.

In Central America, we implemented a robust conflict of interest prevention plan, which consisted of the following steps:

- Conflict of Interest Form: all new and promoted associates completed this statement, so that any potential conflict of interest was disclosed in writing and could be reviewed in advance and prevented in a timely manner
- Signature of acceptance of the Global Conflict of Interest Policy for all new associates: associates read, accept and agree to comply with it at the time of hiring
- Annual review: once a year, the CI team randomly reviews the Conflict of Interest form from a sample of associates to validate that the document has been signed as part of the recruitment process
- Communication campaigns: in July 2022, we issued a reminder about the importance of updating the Conflict of Interest Form and disseminated an awareness campaign in April, November and December 2022
- Alignment with external suppliers: in March 2022, relevant information about conflict of interest was included in the electronic ethical poster, which was distributed to suppliers

Sexual Harassment

At Walmart, we are committed to being a workplace free from sexual harassment. To this end, in Mexico during 2022 we maintained a permanent sexual harassment prevention campaign, obtaining significant results that transcend beyond the company.

Particularly in Mexico, during this year we worked comprehensively and jointly with the Ethics, Compliance, Legal, Human Resources and Operation areas. The result was to raise awareness of some behaviors that were not identified as harassment, and thus be reported, investigated and corrected. This allows to create a free work environment, where no sexual harassment is tolerated and all confirmed events are sanctioned without leaving room for impunity.

In addition, this year we were able to significantly reduce the life time of cases below the target time. In other words, the priority and commitment to contribute to eradicating harassment was reflected in the speed with which we resolve cases. As a result, we can take much quicker actions on improper behaviors and address reported concerns more promptly.

Particularly in Central America, we carried out the following activities in relation to this topic:

- The signing of the Zero Tolerance to Sexual Harassment Pledge was renewed
- Costa Rica's Protocol for Sexual Harassment Cases was update
- The Sexual Harassment Prevention campaign was issued and Human Resources. Compliance and Legal advisors were trained
- Harassment Cases for Costa Rica was reviewed, in accordance with the requirements of the national legislation on this matter, ir order to make the investigation of sexual harassment cases more efficient
- Investigation timeframes for sexual harassment cases were reduced by prioritizing them, placing the associate at the forefront and reducing legal risks for the company



Anticorruption

GRI 205-1, 205-2, 205,3

Being one of the best companies in the world puts us in the public eye. We are a high-performance company that contributes to the development of the countries where we operate. Control and prevention are a permanent part of our entire value chain in order to avoid any irregular action that, no matter how small, indisputably affects our purpose as a company.

Our Global Anticorruption Policy explicitly prohibits any undue payment under any circumstances from any actor in our environment. At Walmart, this type of act constitutes a direct violation of our **Code of Conduct**, which carries disciplinary sanctions among other consequences. In this way, we have global procedures and protocols that are activated on a daily basis to deal with these type of situations.

Code of Conduct

Two main axes that allow us to reinforce our ethical and compliance behaviors in Mexico and Central America were Preventive Measures and Corrective Actions.

Preventive Measures

We carried out Third Party Intermediaries audits (TPIs), which allowed us to better understand the services and operations of our external partners, reinforcing compliance with our **Anticorruption**

Policy and Procedures. We also carried out

the corresponding training on the subject, which was in turn reinforced through communications to the defined audiences, both internally and externally.



Corrective Actions

We implemented action plans to remedy risks identified by our monitoring and audit teams, which is part of our continuous improvement in anticorruption matters.

In addition, the Anticorruption monitoring team will expand to monitor other areas in the Ethics and Compliance program.



ASSOCIATES COMPLETED ANTICORRUPTION TRAINING

Mexico 14,043

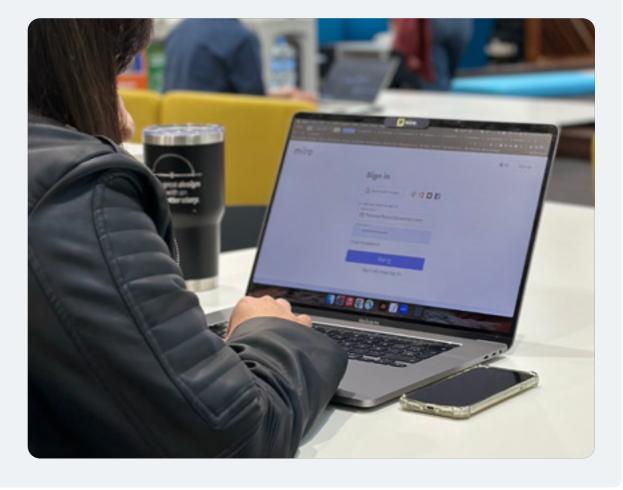
6,663

THIRD PARTIES COMPLETED OR RENEWED THEIR ANTICORRUPTION TRAINING

Mexico 594*

Central America 150*

*Business partners



Global Anticorruption Policy







Food Safety

GRI 416-1 SASB FB-FR-250A.1, FB-FR-260A.2

This year, to reinforce the Food Fraud Program in Mexico and Central America, we used different tools to achieve our objectives:

Threat & Vulnerability Risk Assessment

It is a tool that categorizes foods by risk level according to different criteria ranging from their composition, their history, and up to their manufacturing procedures. Through these factors, we can determine a higher or lower risk category. Once this level has been identified, we proceed to generate a specific monitoring plan.

Software Horizon Scan

It is a tool that identifies food safety risks, food fraud, non-compliance with labeling laws and ingredient substitution in other countries. With this tool, we can determine whether there is a potential risk in our Private Brands' products or not.

Incorporation of new testing techniques for detecting ingredient substitutions and/or non-compliance with ingredient additions

This is to ensure that our Private **Brands'** products always comply with applicable regulatory laws.



Global Food Safety Initiative (GFSI)

We require all suppliers of our Private Brands to be certified in this type of scheme within a reasonable period of time, in case they do not have their own system.

In addition, our meat plant located in Cuautitlán is Safe Quality Food (SQF L-2) certified. This certification allows us to market products that guarantee quality and food safety.



Storage and Distribution Best Practices Audits to DCs and perishable goods deconsolidators:

Mexico

29

36

External audits

In Central America, 100% of Fruit and Vegetable suppliers were included in the **GFSI** program:

269

IMPORTED FRUIT AND VEGETABLE SUPPLIERS

63

100%

AUDIT TYPE

269

FOOD SAFETY AUDITS IN STORES

10,295

OUR BRANDS' FOODS

| | Mexico | Cent | ral America |
|--------------------------------|--------|------|-------------|
| Audited suppliers | 314 | | 180 |
| Audited plants | 378 | | 235 |
| Percentage of certified plants | 95.5% | | 95% |

AUDIT TYPE

| | Mexic | o Cent | Central America | | | |
|--|-------|--------|-----------------|--|--|--|
| Global Food Safety Initiative Certification (GFSI) | 361 | | 223 | | | |
| Global Markets | 17 | | 12 | | | |





Privacy

GRI 418-1 SASB FB-FR-230A.1, CG-MR-230A.2, CG-EC-230A.2, CG-EC-220A.1, CG-EC-220A.2

> We value the privacy and protection of our associates', customers' and suppliers' personal data as an ethical principle and human right. The information shared by our stakeholders is highly guarded and protected.

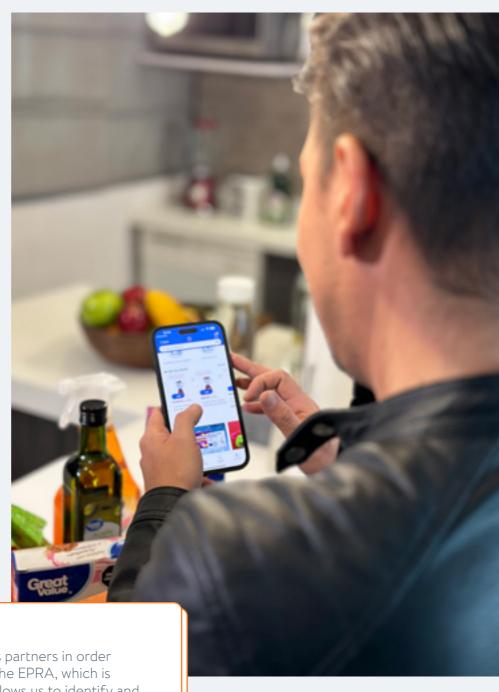
We comply with all regulatory requirements for the acquisition, use and retention of personal information

At Walmart de México y Centroamérica, our **Privacy Notices** are published to provide transparency to our customers, associates and suppliers, clearly defining the type of data we process, as well as the purposes for which we process them.

In 2022, we conducted programs that reinforce our commitment to respecting privacy

EPRA (Enterprise Privacy Risk Assessment)

We developed training and communication campaigns for our business partners in order to understand the importance of the privacy review process through the EPRA, which is applicable to projects involving the processing of personal data. This allows us to identify and mitigate risks and protect our customers' and associates' personal data. All in accordance with the periodic review and update of global policies and standards aimed at the proper handling of personal data and records, among others.



Incident Response

the incident response drill in conjunction Additionally, in 2022 we modified our local

In 2022, we had no confirmed incidents of privacy breaches or data leakage of our customers in Mexico and Central America





Environmental

GRI 304-1, 304-2, 304-3, 304-4, 306-3, 307-1

This program aims to comply with legal environmental requirements in the region. To this end, we harmonize regulatory obligations with our best practices. The goal of being a regenerative company drives us to go beyond the legal requirements and achieve high-impact positive results for the benefit of the environmental ecosystem and humanity.



Mexico

During this year, 7,187 environmental analyses were carried out in Mexico. For the waste program, a total of 1,558 reports on compliance with special waste management plans were submitted, of which, 726 were updates, renewals or first time plan reports. In addition, 1,272 compliance reports were submitted for the Environmental Impact and Risk category.

For wastewater area, a multi-area working group was established in 2022 to implement actions and generate plans to improve water quality that considers all the areas involved in wastewater management. In addition, a multi-year plan was developed to build and renovate treatment plants, as well as to adapt existing treatment plants to comply with the new regulations for wastewater discharges to national assets.

The environment and humanity are at the center of our actions

Project with protected species 2022:

Mexico

Ranchería Marín DC, was built in the state of Tabasco where:

106

species impacted

17.62 hectares of impacted area

Central America

In relation to the wastewater progra:m

5,642

samples were taken

monitoring reports were prepared and submitted to the authorities



Thanks to our training program, 3.996 associates were trained in environmental issues and the Planet **Project Program** was launched in conjunction with the Communication Department and Operations Center to raise awareness among our associates about the pillars, goals and actions we are taking to become a Regenerative Company.





Health and Wellness

GRI 416-1

Our Health and Wellness program in Mexico and Central America aims to comply with all legal requirements, as well as with the best market practices and thus guarantee the optimal operation of our pharmacies and doctor's offices. Likewise, this program establishes and implements the regulatory controls to be complied with in the marketing of products.

We have established standards and controls that ensure we always do the right thing, at all times and in all places. We continually reinforce the protocols of our pharmacies and distribution centers and thus guarantee safe, effective products that comply with current health regulations.

During 2022 we stood out for the following actions in Mexico



We updated the standard operating procedures (SOPs) of pharmacies

We strengthened controls related to product cataloging and supplier registration

We strengthened the validation of health care supplies prior to adding and cataloging them

We implemented temperature and humidity controls and monitoring throughout the transportation of health supplies

In addition, this year the Health and Wellness Program supported the market strategy in launching new health products and services, such as:

- Electronic prescription pilot program in 15 units
- Health membership in 980 units
- Increase in home delivery service, reaching 971 units
- Opening of the Marketplace platform for the commercialization of Class I and II medical devices

TRAINING AND EDUCATION

5,106

pharmacy associates were trained on-line

2,338

associates were trained in DCs through 13 training capsules that cover 34 procedures

| 363 | 45 Medimart Suppliers | | 68 Medimart supplier facilities audited in 2022 | | |
|--|---------------------------------------|------------------|--|--|--|
| Medimart Products 5,254 Products in Pharmacy | 292 Medimart products ar | nalysis | +100 Non-Medimart Suppliers | | |
| Establishments (where distributed or commerc | | lements a | and/or medical devices are stored, | | |
| 1,873 stores selling overthe-counter products | 1,484 Pharmacies | 14 DCs | 1 Return Center | | |
| 413 Doctor's offices in operation | 1468 Internal pharmacy aud | its | | | |

Central America

pharmacies in DCs

Costa Rica 88 1

Guatemala 46 1

El Salvador 8 1

Nicaragua 30 1

AUDITS

Pharmacy

1,37149211external auditsinternal auditsexternalto pharmaciesto pharmaciesaudits to DCs

TRAINING AND EDUCATION

354 7
associates were associates were trained with CBL course course

DCs





Prevention of Money Laundering & Financial Services

We have a Prevention of Money Laundering program aligned with Walmart's global policies and applicable legislation in Mexico and Central America.

During 2022, in Mexico we supported the market strategy in launching new financial products and services and implemented new controls that comply with regulatory requirements and best practices at Walmart, such as:

Remittances from Walmart US to Walmart Mexico

In conjunction with the global team, we implemented constant monitoring to detect unusual activity in the company. This helps prevent money laundering and consumer fraud.

Quality Assurance (QA) process

We work closely with the global team to carry out a QA process that reviews the quality of investigations into alerts and detection of cases for unusual remittance activity, helping us to prevent money laundering and consumer fraud.

In the case of Central America, during the same period, the Prevention of Money Laundering **Program,** among others, supported the market strategy in products and processes such as:

Remittances

Financing

Know Your Third Party and Due Diligence Program

Global Standards such as NPRA & VRA

In Mexico and Central America, standards have been partners, as well as Financial Products and Services (NPRA - New



Licenses and Permits

We comply with the licenses and permits required by our entire value chain



In Mexico, during 2022 we managed more than 38 thousand licenses for the operation of our stores and clubs, of which 15,501 were renewed during the year. In addition, we obtained more than 4,500 licenses for the construction and operation of new units and other strategic company projects.

In Central America, during 2022 we managed more than **7,000 licenses for the operation of our stores,** of which 2,594 were renewed during the year. In addition, we obtained more than 275 licenses for the construction and operation of new units and other strategic company projects.

The entire process, both in Mexico and Central America, is documented in our Global License Management (GLM) system, from researching requirements, authority data, entry, application and fee payment, to obtaining the license document.

Private Brands suppliers evaluated in Mexico:

GENERAL

480

786

not approved

MERCHANDISE

FOOTWEAR

16

suppliers

42

audits

not approved

326

53 not approved **INSPECTIONS**

18,574

factory inspections of national suppliers

source inspections to import suppliers

source inspections to import suppliers -Walmart Sourcing



← BACK

Product Safety

GRI 416-1 SASB CG-MR-410a

One of our obligations is to ensure the safety of the products we sell to our customers. From cosmetics, consumables, apparel, footwear to general merchandise, we ensure that they comply with safety, regulations and quality standards.

The safety of our products is not limited to regulatory requirements; we go beyond that and incorporate international standards for reliable and safe products.

> During 2022 in Mexico, through FCCA (Factory Capability and Capacity Audit) audits of eight categories (apparel, linens, footwear, cosmetics, electrical and electronics. jewelry and accessories, toys and general merchandise), Private Brands factories were requested and verified to have safety and quality controls in place.

> In addition, we participated in seven of the 12 quality studies for general merchandise promoted during 2022 by Profeco for the following products: towels, latex gloves, pants, socks, electrical extensions, t-shirts and Private Brands roto-hammers, to ensure that the company's requirements are met and that the products are safe for our customers and members.

We perform annual random monitoring of all our categories classified as "high risk", which consists of verifying, through testing methods accredited by the EMA/ Cofepris, that the products comply with safety standards to preserve the health of our consumers. Likewise, corrective and preventive action plans are worked out in case of finding deviations from our suppliers.

ETHICS AND COMPLIANCE 10/1

Among the review protocols are the certifications in the current standards. which are delivered by the suppliers, and where the requirements and safety of the products are reviewed, with emphasis on our Private Brands.

In addition, we supervise textile and footwear products through laboratory tests and factory inspections of national and import suppliers, in order to validate compliance with regulations and the safety and quality standards established by Walmart.

In Central America, we manage more than 17 thousand health registrations required by regulations to reinforce the sale and

suppliers and products inspected during 2022 had the required certifications, as

GENERAL MERCHANDISE

HOUSEHOLD APPLIANCES





Labor and Employment

GRI 402-1, 408-1, 409-1

Every day we ensure that we comply with the labor rights of our associates in Mexico and Central America, we take action to ensure that they are aware of their rights, such as working in an environment free of discrimination and sexual or workplace harassment, being paid correctly, and quaranteed rest periods. Thanks to these practices, labor standards become habits that respect human rights.





LEARN MORE ABOUT **OUR EFFORTS**



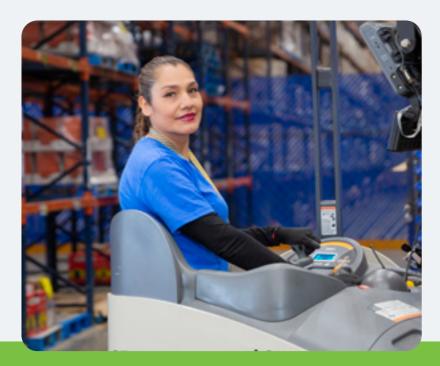


Foreign Trade

Our Foreign Trade program consists of ensuring that the import and export of the company's merchandise complies with the applicable foreign trade regulations, as well as the payment of the appropriate taxes for foreign trade operations.

This program also ensures that we maintain a safe and secure supply chain during the import process

We perform monthly monitoring of imports for the entire company, including eCommerce, in order to ensure that the foreign trade standards and controls implemented are being followed correctly.



With regard to compliance with applicable foreign trade regulations, in Mexico, in collaboration with the Imports area, we ensured that import logistics service suppliers have governmental security standards, controls and certifications, for example: Customs and Trade Partnership Against Terrorism (CTPAT), Authorized Economic Operator (AEO) and Partners in Protection (PIP), in order to keep the supply chain of imported goods safe and secure, avoiding operational disruptions, as well as drug, arms and human trafficking, among others.

In Central America, efforts were made on specific foreign trade issues, such as rules of origin in free trade agreements, based on the amount purchased and from origins such as the United States, Mexico and Central America. This way, we ensure that our customs declarations to the competent authority are accurate, thus avoiding fines or reputational damage to the company.



Antitrust

GRI 206-1

We offer constant training in antitrust matters both to areas that represent greater risk, as well as to other areas that develop new projects within the business. In this regard, during 2022, an electronic Antitrust Compliance training was implemented, aimed at our Purchasing or Category areas, through which associates from those areas were trained. The implementation of the local and global trainings (Antitrust and Competition Law Foundations) facilitated the customization of face-to-face training sessions for all Walmart teams, aligning them under the same ethical and legal purpose.

During 2022, we constantly reinforced relevant Antitrust Compliance issues. For example, direct and personalized communications were sent to suppliers and sellers about Walmart's commitment to comply with antitrust laws and negotiation rules to avoid anti-competitive practices. This communication was further reinforced with a message from our Procurement Leader to supplier leadership. In doing so, we ensure that each supplier and seller is committed to Walmart's ethical and compliance purposes.

On the other hand, various queries from the Category (Procurement), Marketplace and Growth teams were resolved, providing business-oriented solutions; in addition, the implementation of new monetization initiatives was reviewed and validated in conjunction with the Legal area, which allowed us to reinforce our identity of transparency and trust.

P. 160

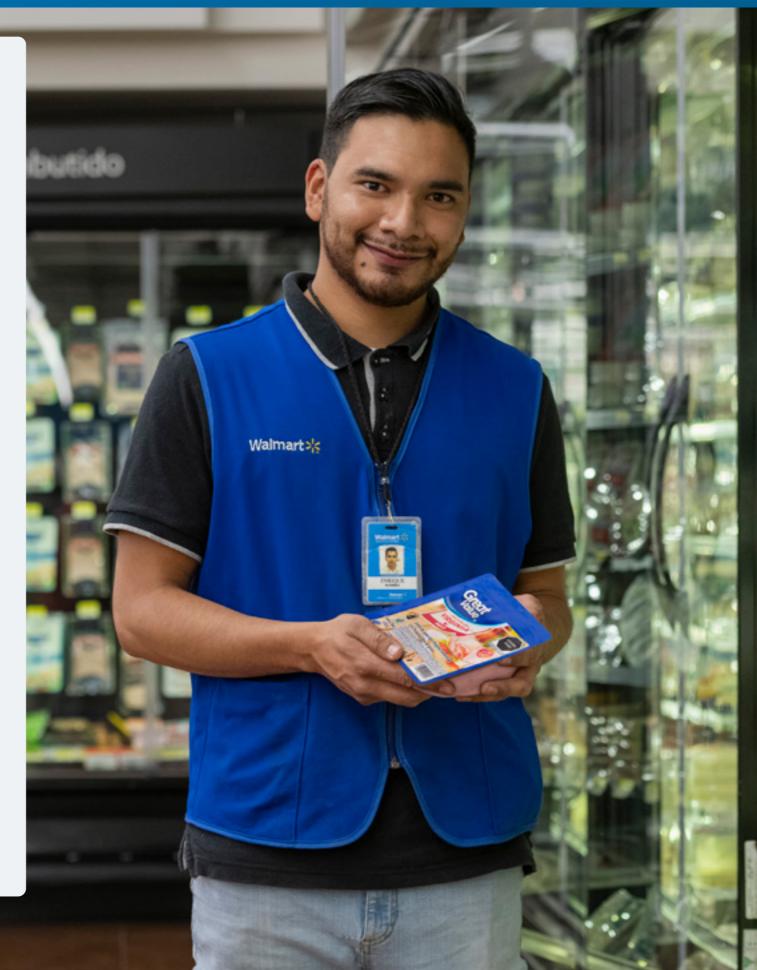


ASSOCIATES TRAINED MEXICO AND CENTRAL AMERICA

5,877 associates were trained (including e-training)

face-toface training sessions

Our main objective is to train and sensitize our associates to prevent and detect any potentially anticompetitive behavior



update their images for our online sales

In addition, we ask our suppliers to

In Central America to review the labeling requirements of products in different categories, such as Food, Consumption and Perishables, in order to verify compliance with regulations.

Another important focal point of the compliance program is the attention to consumers in the post-sale process. During 2022, several training sessions were held for store teams in Central America to provide them with tools for timely handling of warranty claims from consumers when items are defective.



Consumer **Protection**

GRI 416-2, 417-1, 417-2, 417-3, 2-27 SASB FB-FR-270A.1



Our customers inspire us, that is why it is our duty to protect and defend their rights

Our customers are at the center of our decisions and every day we align ourselves with consumer protection requirements and best practices. To this end, we have a highly trained team, capable of taking comprehensive actions that always seek to provide the required information to the consumer so that they can make an informed purchase decision.



We have efficient controls that allow us to strengthen every day the requirements of the regulation on Consumer Protection, being the main ones related to:

Origin of product or service components

ETHICS AND COMPLIANCE 10/1

Content, especially with regard to substances that may have an environmental, social or nutritional

Product or service safety instructions

Product labeling

Each year we continue the **Consumer Protection** program to apply efficient procedures. We also carry out the communication and training program for store and club teams as well as staff that generate information, advertising and/or promotions for our customers. For example, we perform electronic training on Advertising and Promotions Rules with the applicable rules for each product.

This ensures that such information is clear and truthful, complies with legal and ethical requirements, and helps our customers and members to make an informed purchasing decision. In addition, we reinforce communication and training in staff and operation, in order to

avoid sanctions by authorities and respond to our customers' needs. We know that in order to maintain customer loyalty, it is important to provide effective continuity to our policies, programs and processes.

For this reason, during 2022 we reinforced controls to prohibit the sale of alcohol to minors, both at physical stores and in home deliveries, which we monitor. We also created a complaint dashboard for Bait, our mobile phone service, which allows us to identify the most relevant issues by type and by state within the country so that they can be addressed.

On the other hand, we adhere to Walmart's regulatory requirements and best practices that allow us to periodically control and monitor the terms and conditions of products and/or promotions in each of our verticals: Bait, Cashi, Connect and Health. In addition, we constantly train our Marketing teams, among other teams that prepare the advertising material, in order to provide correct, clear and complete information for our customers.

We know that transparency generates trust, so we reinforce our requirements regarding the information offered in our company. We took additional actions; for example, we implemented a matrix that requires minimum advertising requirements (e.g., validity of promotions, terms and conditions, cautionary legends, etc.) to be enforced by the Walmart Connect team and Marketing teams across all formats.





GRI 308-1,308-2,408-1,414-1,414-2, FB-FR-430A.3, FB-FR-430A.1,CG-MR-410A.1

DIGNITY THROUGHOUT OUR VALUE CHAIN

Responsible Sourcing

We are agents of change in favor of social progress and environmental conservation

To achieve this, it is necessary to take care of our value chain from the perspective of responsibility, transparency and legal compliance. To this end, we are strengthening our relationships with suppliers. In this way we eradicate any conduct that negatively impacts human rights and the environment.

The prohibition of forced and child labor, equality and non-discrimination, the prohibition of corruption and the quarantee of decent work are our daily commitments. In turn, the responsible use of environmentally friendly products, as well as the reduction of our carbon footprint, are goals that are reaffirmed and reinforced every year. To speak of a responsible value chain is to speak of a regenerative company, which evaluates and monitors our actions and the actions of third parties that make up our value chain.

In 2022, we had

7,466

suppliers with active contracts for Mexico and Central America markets

According to the Factory Audit System, there are

1,734

single active facilities in Mexico and Central America that supply several Walmart retail markets, including retail markets in Mexico and Central America



We continue to grow together with our suppliers. For this reason, we improve the different mechanisms available to our suppliers and support them in promoting the human dignity of workers.

Responsible Sourcing Academy

We provide training resources and guidance on best practices from a training perspective, developed by third parties and in several languages.

Subjects addressed:

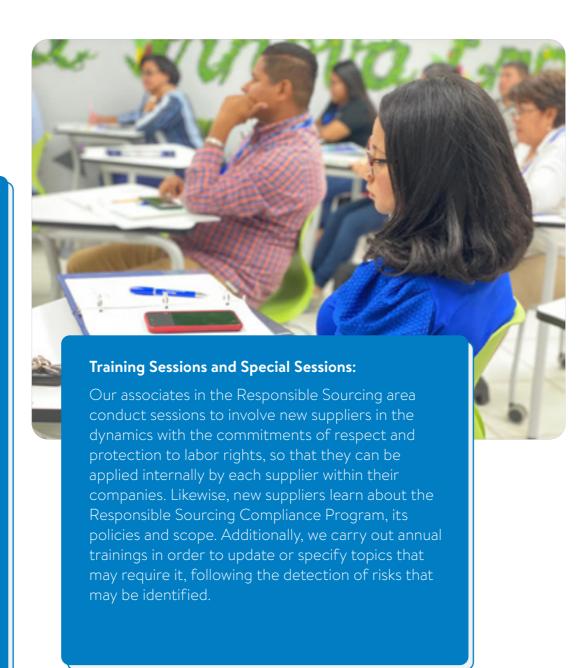
- Audit guides
- Global compliance guide
- Forced labor
- Health and safety
- Supply chain controls

61

supplier representatives have completed training courses in Mexico y Central America

58

new supplier representatives have been trained in Mexico y Central America



This year, one of our objectives was to ensure that suppliers are aware of the purpose and requirements of the Responsible Sourcing Program, as well as to follow up on the improvement of their facility scores.

Additionally, in Central America we focus on providing useful and effective information to comply with Responsible Sourcing requirements:



We created audit guides for new or potential suppliers, in order to give effective visibility to the requirements of the applicable programs, depending on the specific product

We accompany existing suppliers to improve the score of their facilities and avoid their inactivation or removal. Therefore, we implemented training sessions focused on remediation of the major risks found during the audit. We reinforced suppliers' obligation to know and comply with the **Supplier Standards**, given that they have made a commitment to apply these duties in their businesses and throughout the process of supplying products to Walmart. In addition, they inspired liability practices for the conduct of any supplier, subcontractor and agent involved in their business activities, such as factories, processing facilities, raw material, component and ingredient suppliers, among others.



Evaluating Supply Chain Risks

Annually, our Responsible Sourcing area performs risk assessment within our supply chain

This allows us to identify risks in order to provide efficient solutions. We have adequate criteria to meet risk prevention or mitigation objectives.

Some of these evaluation criteria are:



Detection of areas most prone to and with the greatest impact on key risks in our supply chain

Risk analysis by country where we operate, based on internal and external data that take into account scope and severity factors

Identification of specific commodity and other product risks, based on data, local and expert intelligence, among other sources, which allows us to better understand the locations and supply chains where problems are particularly severe



Once the main sources of risk are identified, we proceed to detect the causes that originated them, as well as conducting an evaluation that contributes to solve them and that considers the possibility of making changes in our policies or procedures, in order to provide a comprehensive response.

The audits address a variety of topics, allowing for the inclusion of diverse approaches, such as workers' compensation, voluntary labor practices, working age laws and standards, working hours, and facility health and safety standards, among others.





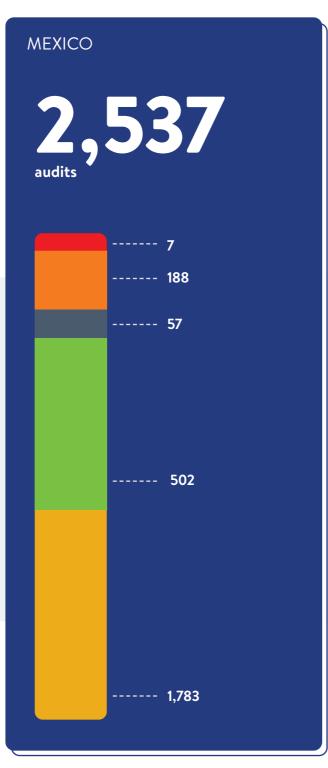
Audit and Risk Classification

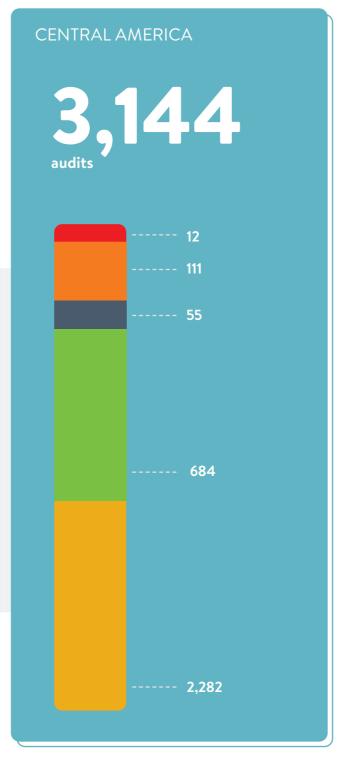
In 2022, we continued with the classification of the third-party audit reports submitted for each facility. We assigned a green, yellow, orange or red rating for each facility, based on the evaluation of the third-party program and our own review of the report, according to our Supplier Audit and Evaluation Policy. This allowed us to determine the supplier's level of compliance with our standards



^{*} Three consecutive Orange ratings may result in a Red rating, regardless of whether the facility remains in good standing with the audit program chosen.

AUDIT RESULTS





Claim mechanisms

Our Responsible Sourcing area offers different accessible channels to raise concerns about irregularities, and thus seek remediation solutions.



Trust and Safety

Trust and Safety is a program that defines policies and uses tools, systems, and processes specifically for:

Detecting and blocking products and/or sellers that do not comply with applicable regulations

Detecting and blocking content or products that are offensive. discriminatory, or contain inappropriate language

Monitoring risky activities at product and seller level

By carrying out these activities, we can provide our customers with a secure place to transact on our Marketplace platform, building and maintaining their trust.

^{**}If a facility is given a Red rating, it may be banned from producing goods for Walmart indefinitely or its production may be halted and/or its product refused.



CORPORATE GOVERNANCE

GRI 2-9

The goals achieved in 2022 are possible thanks to the experience, leadership and commitment of our corporate governance

Board of Directors

GRI 2-9, 2-10, 2-11,2-12,2-14,2-17,2-18,2-19,2-20, 2-21, 405-1 SASB CG-EC-330A.3, CG-MR-330A.1

| GENERAL INFORMATION | | | | | | | | | | | |
|---|-------------------|--------------------------|------------------|--------------------|---------------------|------------------|-----------------------|------------------|-----------------------|-----------------------|-------------|
| | Judith McKenna | María Teresa Arnal | Adolfo Cerezo | Ernesto Cervera | Kirsten S. Evans | Leigh Hopkins | Eric Pérez- Grovas | Elizabeth Kwo | Guilherme Loureiro | Karthik Raghupathy | Tom Ward |
| Gender | F | F | M | M | F | M | M | F | M | M | M |
| President | | | | | | | | | | | |
| Independent | | | | | | | | | | | |
| Members since | 2022 | 2022 | 2012 | 2014 | 2018 | 2022 | 2018 | 2022 | 2016 | 2022 | 202 |
| EXPERIENCE | | | | | | | | | | | |
| Accounting & Audit | | | • | • | | • | • | | • | | |
| Branding & Marketing | | | | | | | | | | | |
| Business Strategy | | • | | | | | | | | • | |
| Corporate Governance | | • | | | | | | | | • | |
| Economics and Finance | | • | | | | | | | | • | |
| Energy | | | | | | | | | | | |
| Entrepreneurship | | • | | | | | | | | | |
| Environmental, Climate Change, Sustainability | | | | | | | | | | | |
| Ethics & Integrity | | | | | | | | | | | |
| Health & Safety | | | | | | | | | | | |
| Human Resources | | | | | | | | | | | |
| Human Rights | | | | | | | | | | | |
| Technological Infor-mation/Cybersecurity | | • | | • | | | | | | • | |
| Investor Relations | | | | | | | • | | | | |
| Logistics | | | | | | | | | | | |
| Manufacture | | | | | | | | | | | |
| Mergers & Acquisitions | | | | | | | | | | • | |
| Institutional Relations | | | | | | | • | | | • | |
| Real Estate | | | | | | | | | | | |
| Regulatory and Legal Affairs | | | | | | | | | | • | |
| Risk Management | | | _ | | | | | | | | |



COMPOSITION AND FREQUENCY OF THE BOARD OF DIRECTORS

It is comprised solely by statutory members.

Members are appointed each year by the Ordinary Shareholders' Assembly.

Independent Directors must constitute a minimum of 25% of total members. As of December 31, 2022, 45% of all directors are independent.

The officers of the Company and its subsidiaries are limited to executive presidency and general direction positions only.

The Board of Directors meets a minimum of four times a year. During 2022, they held 4 meetings. The average meeting attendance was of 84%.

The average tenure of the members of the Board is 3 years.

LEARN MORE ABOUT

BOARD MEMBER BIOGRAPHIES

LEARN MORE ABOUT PRIMARY **RESPONSIBILITIES AND OTHER PRACTICES**

Minority shareholders, whose shares represent a minimum of 10% of owners' equity, have the right to appoint and remove a member of the Board of Directors. Their appointment may only be removed when the other members of the Board of Directors are revoked.

At the close of 2022, 29.49% of the company shares are traded among the investor public.

of the members are women, i.e. 36%

of the members are independent, i.e 45%

Audit and Corporate Practices Committees

GRI, 2-9, 2-19, 2-20, 207-2, 405-1

Currently, the committees are integrated by five directors, all of them independent.

- Adolfo (erezo President
- Ernesto (ervera
- Eric Pérez-Grovas
- Elizabeth Kwo
- María Teresa Arnal

LEARN MORE ABOUT THEIR PRIMARY **RESPONSIBILITIES, PRINCIPAL REQUIREMENTS AND PRACTICES**

Walmart de México Foundation **Board Of Trustees**

GRI 405-1, 2-13, 2-9

It is made up of 13 trustees, four of whom are independent directors and meet four times a year.

LEARN MORE ABOUT ITS CONFORMATION AND MEMBERS





GOOD DIGITAL CITIZENS

We seek to build and maintain the trust of our customers, associates and communities regarding the use of technology and data, in line with our values of service, excellence, integrity and respect for the individual.

As our customer proposition has evolved beyond stores and clubs to become a more digital and omnichannel offer, our focus on data and technology has become a fundamental part of building trust.

Walmart's digital trust commitments, based on Walmart's core values

Service: our use of technology and data will be in service of people.

Excellence: we strive for excellence in our technology, making it simple, convenient and secure.

Integrity: we will use data responsibly and transparently and always with integrity.

Respect: our data practices and technology will treat people fairly, with dignity and respect.



We implement these commitments through four key focus areas:

Promoting impartiality

Through the guidance of the global Digital Citizenship team, we shape decisions about the use of new technologies, services and data

Privacy protection

We maintain policies and controls regarding the use and exchange of customer and associate information

Data, records and information management

We support the use of data and technology through policies and procedures, associate training, and monitoring and evaluation

DOUP(IALITYMANA

Cybersecurity and information security

We protect our information and digital infrastructure from cyber-attacks through compliance with international standards, incident reporting policies, escalation practices and vulnerability testing



Charles Printers Compra



HUMAN RIGHTS

GRI 410-1,411-1

Through our <u>Statement on Human Rights</u>, we have established public commitments that guarantee respect for human rights and dignity for all our stakeholders



At Walmart de México y Centroamérica we take several measures that have a positive effect on each of our stakeholders' ability to harness and benefit from their human rights

Actions performed for our stakeholders:

Community

We mitigate social problems through specific actions that allow us to reach vulnerable communities



Associates

We offer inclusive workplaces, free from discrimination and harassment. We offer opportunities with fairness and respect



Customers

We work on being empathic with their realities and conditions. We provide alternatives, products and services within everyone's reach, so that financial conditions do not limit access to a better quality of life



Suppliers

We seek to promote their economic and development rights. We take actions that allow them to grow with us and have a positive impact on society



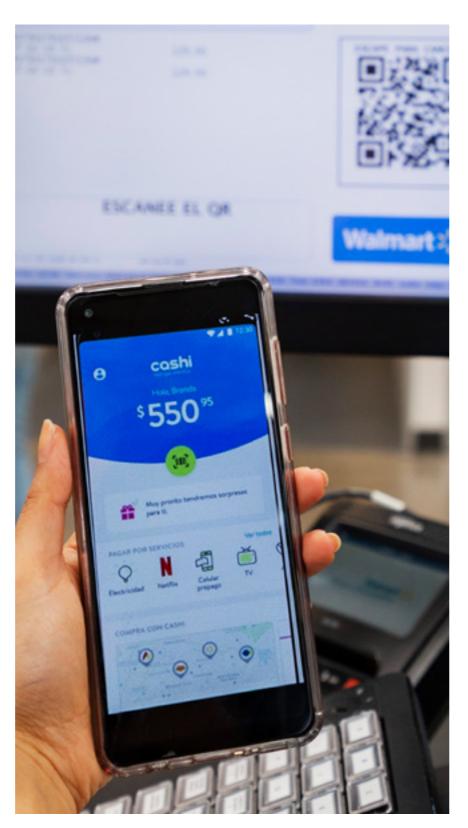
INFORMATION SECURITY

FB-FR-230A.2, CG-MR-230A.1, CG-EC-230A.1

For us, information security in Mexico and Central America is as important as our business strategy



We know the scope involved in processing data from our customers, suppliers and associates. Our objective is to maintain information security by fully understanding information shared by our associates, business partners and relevant Tribe leads. To achieve this. we have information security policies, standards, procedures and guidelines that seek to regulate and raise awareness among associates and suppliers about the importance of safeguarding information and the use of technological resources used by our company. We also train our associates to make them aware of the importance of adopting behaviors aligned with our information security guidelines.





Thanks to our comprehensive, costeffective and risk-based security services, we are able to provide a reliable and solid service. To do this, we ensure that information and information systems are protected against unauthorized access, use, disclosure, alteration, modification or destruction. In addition, we ensure that we follow best practices to identify risks, detect suspicious activities and anticipate potential incidents. We also identify and manage vulnerabilities present in the company's information assets, considering elements such as: vulnerability analysis scheduling, results documentation and vulnerability classification, prioritizing their attention according the risk involved.

On the other hand, we provide guidelines for the design of vulnerability remediation plans, penetration testing protocols for critical assets and documentation of test results, requesting the correction of detected opportunities.

Our purpose is to provide greater confidentiality, integrity and availability for our customers every day

Information Security Governance

The Audit and Corporate Practices
Committees are involved in the
information security strategy. The
Committees meet every three months
to review initiatives, trends, risks and
strategies with the aim of mitigating
potential damage to the information
handled by the company.

Additionally, in each market where we operate, we have an information security leader who is part of the Audit and Corporate Practices Committees. This allows us to define and review the best cybersecurity strategy for each specific case, according to its context and needs.

Our vast and complex ecosystem of products and services positions us as a global reference point. As we handle millions of transactions per second, we receive more than 1.5 billion cyber-attacks per year. Therefore, after a contingency that impacts our continuity pillars in matters related to associates, facilities, systems and third parties, we activate our plans and controls to ensure the continuity of the business and our activities.





RESULTS **During 2022 we achieved**

88% reduction in vulnerabilities

derived from system penetration testing compared to 2021. We also obtained the PCI Security Standards certification with no findings noted.

We improved our NIST CSF (National Institute of Standards and Technology Cyber Security Framework) maturity level from 3.83 to 4.0, the highest rating of this framework.

In line with Infosec
International, we are
working to consolidate
our response and
prevention protocols
to improve the way we
react in the event of a
ransomware attack.

In terms of security, there was an increase in the number of requests for information from internal and external reviews. We receive audits from both the Internal Audit team and external entities in the financial sector to demonstrate compliance in correspondent banking services, as well as with external auditors from NIST, Sarbanes & Oxley and PCI (Payment Card Industry).



LEARN MORE ABOUT OUR

RISK ASSESSMENT



RISK ASSESSMENT

GRI 2-25, 2-26

Each year, Global Audit Services conducts a Risk Assessment following the methodology established by Walmart Inc. and adapting it to the reality of Mexico and Central America

Enterprise Risk Management (ERM)

With every step we take, we strengthen our culture of risk identification and management. At Walmart de México y Centroamérica, through the ERM (Enterprise Risk Management) process, we play a fundamental role in guaranteeing the right balance between risk management and risk mitigation. In this way, we achieve the safe implementation of our strategies, in order to reach our goals despite operating in a highly changing environment.

With our ERM, we work cross-functionally and collaboratively with our teams in Mexico and Central America, facilitating holistic risk management and the exchange of best practices.

Each quarter, we identify and evaluate the inclusion of new risks, updating them according to key and critical aspects. Therefore, rigorous assessment of the inherent and residual probability and impact level that a risk may cause is fundamental. Finally, we invest significantly in mitigation plans to be taken into account on a day-to-day basis.

The risk assessment process consists of three major steps and is conducted every quarter:

Management

The mitigation needed is determined, action plans designed with and assigned head, and Risk Champions, jointly with the Executive Committee, oversee the execution

Evaluation

Risk managers and the central teams are called together to reassess risk previously identified and any new ones; impact and probability are then scored

Report

Risks are recorded under an impact/ probability matrix; then risked are classified by priority, providing this "Risk Register" to Risk Owners so they in turn may review the status

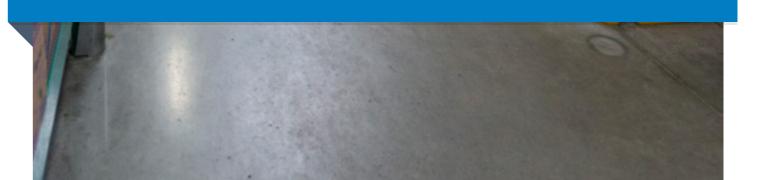


To simplify risk registration to ensure an efficient focus on the most critical risks for our company

To strengthen the collaboration process among our markets, to exchange best practices and maintain local risk management

To review and strengthen mitigation plans to improve their design, adequacy, clarity of controls, roles and responsibilities

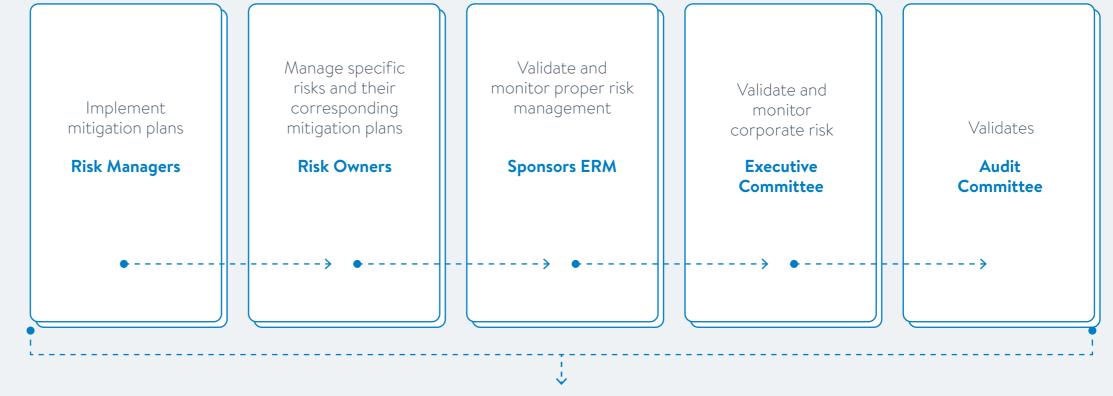




This assessment led to the identification of priority risks in the short, medium, and long terms, for example, the risk of an increase in the cost of doing business and interruptions in the supply chain



The following is an example of the ERM process:



The ERM process considers five categories

Strategic*

Consumer expenses, industry consolidation, key market growth, threats of competition

Operational*

Physical safety, fraud/theft, food safety, cybersecurity, interruptions to supply, talent

Regulatory and Compliance

Regulatory investigations, violation of personal data, health and wellness, financial services

Financia

Credit, currency, liquidity, interest rate volatility, financial reports, taxes

Reputational

Mass media/ social media coverage, organized campaigns, a damaged corporate trademark

^{*}Includes COVID-19 impact and any other natural disaster or cases of force majeur