

ETHICS AND INTEGRITY

Evolving ecosystem
We always act
with honesty
and respect.



1,219
zero accident stores and
clubs **in Mexico.**

536
zero accident stores **in**
Central America.

GRI 205-2

Ethics and Integrity

The way we operate our business is as important as the products and services we offer our customers. Therefore, we act ethically and with integrity, always aiming to promote our stakeholders' well-being.





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

Ethics and Compliance

Our commitment to compliance with the highest ethical standards allows us to establish a culture of integrity, building trust among our associates, customers, investors, suppliers, and business partners. Our Ethics and Compliance program is designed to keep us consistent and responsive, adapting as our business and external environment evolve.



Ethics and Compliance Fundamentals

The Ethics and Compliance program is based on risk prevention, which enables us to address our business’s needs. To achieve our objectives, we must always do the right thing, respect others, lead by example, and place our customers at the center of all our decisions. Therefore, we ground our approach on the following fundamentals:

- Corporate Culture
- Compliance Leadership and Staff
- Risk Identification and Analysis
- Policies, Procedures and Controls
- Training and Communication
- Internal Monitoring and Evaluation
- Confidential Reporting
- Investigation and Remediation
- Continuous Improvement

Ethics and Compliance Program

Throughout our operations, we materialize our commitment to operate an ethical business by implementing the following compliance programs:

- Safety and Hygiene
- Ethics
- Anticorruption
- Food Safety
- Privacy
- Environmental
- Health and Wellness
- Financial Services and Money Laundering Prevention
- Licenses and Permits
- Product Safety
- Labor Compliance
- Foreign Trade
- Antitrust
- Consumer Protection
- Responsible Sourcing

To ensure the effectiveness of these compliance programs, we continuously evaluate their implementation and impact across our operations. Our commitment to assessing and enhancing this process on an ongoing basis allows us to identify growth areas and strengthen our risk mitigation efforts.



Continuous Improvement

Through our Continuous Improvement team, we constantly monitor the execution of compliance standards and controls regarding risks that affect our business directly. This allows us to identify strengths and areas for improvement to develop action plans. We can then ensure that our Compliance Program remains aligned with the industry's new demands and expectations.

Our proactive monitoring approach allows us to track compliance performance and make necessary adjustments in real time, ensuring that our standards remain solid and congruent with business objectives.

We executed

5,660
monitoring



of different compliance programs in
operating units in Mexico.

GRI 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8, 403-9, 403-10

Safety and Hygiene

2024 was a year of great challenges and efforts in terms of safety. We were able to endorse and support our zero-accident vision through our risk mitigation methodology. We are committed to creating a safe place to work and shop. The health and safety of our associates and customers are not just business needs, they are part of our Walmart Culture.

Strengthening our safety culture requires a multifaceted approach. One of the key aspects is equipping associates with the right knowledge and tools to maintain a safe work environment. Therefore, we constantly improve our training programs so that associates have the necessary knowledge, skills, and experience to perform their jobs safely. Likewise, at Walmart de México y Centroamérica we are convinced that recognition is one of the most effective instruments for promoting and strengthening a safety culture.

We identified stores with high accident rates and designed interdisciplinary interventions to respond with preventive and corrective actions.



2024 OBJECTIVE:
Reduce associates accidents vs 2015

-71.0%
Mexico

-69.0%
Central America

2024 RESULTS:
Associate accident
rate vs 2015

-64.7%
Mexico

-59.6%
Central America

2024 RESULTS:
Customer accident
rate vs 2015

-74.5%
Mexico

-69.9%
Central America

ACCIDENTS

	MEXICO			CENTRAL AMERICA		
	2022	2023	2024	2022	2023	2024
Work-related injuries	5,051	4,661	5,291	517	527	575
Lost-time injuries per hours worked*	1.87	1.69	1.93	1.13	1.14	1.24
Customer accidents	693	638	601	155	167	159

* Lost-time injuries per hours worked = Lost-time injuries* (200,000) /Total hours worked.



In Central America we streamlined and enhanced our way of working so that executives from all formats could gather to discuss safety concerns, carry out action plans, and closely monitor the programs' execution. In addition, we trained store leaders through safety coaching sessions.

In 2025, we will continue to consolidate our Safety and Hygiene Management System in Mexico and Central America, which will help us drive continuous improvements.

1,219
zero-accident stores
and clubs in Mexico.



536
zero-accident stores
in Central America.



GRI 2-15, 2-23, 205-3, 406-1

Ethics

We are a company in constant evolution that maintains its essence based on its culture and values. Business ethics guide our actions, ensuring our sustainability and strengthening the trust of those who collaborate, consume, invest or do business with us.

Upholding ethical values in our daily operations is not just a commitment—it is an essential part of how we work. To support this, we have established clear policies that guide our associates in ethical decision-making.

Learn more about our core ethics policies that guide us every day:

1. Code of Conduct: Defines the guidelines for expected behavior to generate trust with our associates, customers, and throughout our company, bolstering the idea that Walmart is committed to abiding by the laws and regulations in all locations where we operate.

2. Global Harassment and Discrimination Prevention Policy: Sets guidelines that strictly prohibit all discriminatory and harassing behavior.

3. Global Conflict of Interest Policy: Establishes guidelines for making fair and objective commercial decisions that build trust, considering the company's interests and exercising good judgment, while remaining mindful of personal interests or situations that may affect their objectivity.

We remain in the top 10 of AMITAI's Most Ethical Companies* ranking.

* The ranking of the Most Ethical Companies and its logo are a registered trademark, used under the license of INTELICOMP S.A DE C.V.



This year, we continued to promote various actions in Mexico and Central America to strengthen a culture of integrity among our associates:



Training: We provide annual training on the Code of Conduct for both new and existing associates. In 2024, we expanded the training audience to include team leaders, who received specific Ethics, Anticorruption and Antitrust training.



Integrity in Action Award: Each year, we celebrate associates who exemplify our values and foster a culture of integrity. In 2024, we saw an increase in nominations, recognizing associates who have been outstanding models of integrity.



Sexual harassment prevention: We launched the *Yo Te Cuido* (I Take Care of You) program with the support of our CEO and vice presidents, who actively communicated their commitment to fighting sexual harassment. The program included awareness sessions for leaders, resources to address inappropriate conversations, and internal social media campaigns to identify and report misconduct, among other initiatives.



Integrity ambassadors: Company leaders served as spokespeople for integrity initiatives, participating in key campaigns such as sexual harassment prevention. They emphasized the importance of acting ethically, respecting the law, and adhering the company's policies to achieve our goals.



Integrity Index: Consists of six questions related to the company's culture of integrity and knowledge of the process to report inappropriate situations, which are included in the associates' engagement survey.

Providing accessible and transparent channels for associates and stakeholders to report concerns is another integral part of maintaining a strong ethical culture. Our grievance mechanisms ensure that any misconduct is addressed promptly and fairly.





GRI, 2-7, 2-16, 2-26, 205-3

Grievance Mechanisms

We remain firmly committed and focused on addressing complaints received through our reporting channels, available 24 hours a day, 7 days a week. This can be done in Spanish, and our operators can attend reporters in other languages when necessary. Complaints can be anonymously and are handled by specialized teams dedicated exclusively to managing these processes. To this end, we have different communication and reporting channels available:

Phone line:

- Mexico Ethics Line 800-963-8422
- Guatemala Ethics Line 1800-835-0377
- Honduras Ethics Line 8002-220-0141
- Costa Rica Ethics Line 0800-542-5443
- El Salvador Ethics Line 800-6126
- Nicaragua Ethics Line 5052-248-2275 | 001-800-220-1967 (TF)



E-mail: ethics@walmart.com

Website: <http://www.walmartethics.com/>

Face-to-face for associates: Open-door communication through which associates can make their concerns known to the direct leader, next level leader, Human Resources, Ethics and Compliance, or Legal leader.

We understand the courage it takes to voice and share concerns. Therefore, at Walmart we do not tolerate any form of retaliation against those who report concerns or participate in an investigation.

Remediation measures: Confirmed cases may result in disciplinary measures ranging from a warning to termination of the labor or commercial relationship. In addition to the findings identified in such cases, remediation measures may be implemented in coordination with business areas, including training, process improvements, publication and modification of policies, and reinforced communication, among others.

GRI 205-1, 205-2, 205-3, 415-1

Anticorruption

We maintain a firm stance against bribery and corruption, and we compete fairly and honestly in all countries where we operate. Our anticorruption policies reinforce our commitment to fair and transparent business practices, safeguarding our reputation and long-term sustainability.

Our [Global Anticorruption Policy](#) explicitly prohibits any form of bribery. It strictly forbids receiving, offering, paying, promising to pay, or authorizing the payment of money or any item of value to improperly influence any act or decision of any person, including government officials, or to gain an unfair advantage in securing or retaining business. At Walmart de México y Centroamérica, such actions are a direct violation of our Code of Conduct. The Global Anticorruption Policy applies to all associates and Third-Party Intermediaries (TPIs) acting on behalf of Walmart. We also require our suppliers to adhere to our Standards for Suppliers.

To effectively combat corruption, we have established both preventive and corrective measures that help us mitigate risks and strengthen compliance:

Preventive measures: We carry out annual assessments to identify and prioritize the risks we face, ensuring clarity of any circumstances that may arise in our omnichannel operation, including our business verticals. In this way, we can focus our resources on the most critical areas. We conduct monthly and quarterly monitoring reviews and audits led by the Finance, Anticorruption and Internal Audit teams to ensure the proper implementation of our controls and processes, as well as with Third-Party Intermediaries. In addition, the Anticorruption team continuously monitors specific controls.



Corrective actions: As a result of these monitoring efforts and audits, we can identify opportunities in the design or execution of our controls and processes and implement comprehensive and effective remediation plans. This allows us to correct or mitigate risks that arise, strengthening our business relationships and daily operations.

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

Food Safety

We reaffirm our commitment to food safety to protect the health of our customers and members, who are increasingly interested in knowing where their food comes from, its contents, and manufacturing processes. Our objective is to offer products at accessible prices, guaranteeing food quality and safety. To this end, we have fundamental programs in Mexico and Central America, such as

High Five Program

1. Keep it cool, keep it hot.
2. Cook it and cool it down.
3. Stay clean, stay healthy.
4. Prevent cross-contamination.
5. Wash, rinse and disinfect

Food Fraud Program: We perform food fraud analyses on high and medium risk products by verifying compliance of ingredients that are susceptible to substitution. With this, we can determine if there is a potential risk in Our Brands products. In addition, we align our practices with our suppliers' own to standardize our operating methodologies.

Integrated Pest Management Program: We implement controls in stores, DCs and manufacturing plants to prevent contamination risks along the supply chain and reinforce cleaning practices in stores and clubs. These are managed by measuring indicators based on geographical locations and contamination risks.

Global Food Safety Initiative (GFSI): We require all Our Brands suppliers to be certified under this framework, in case they do not have their own system. We continue to work with input and ingredient suppliers in departments that process food sold in stores with Global Market audits, to achieve their GFSI certification.

We obtained successful results:

- Our beef plant located in Cuautitlán is Safe Quality Food (SQF L-2) certified, which allows us to market products that guarantee maximum quality and food safety.
- 100% of our facilities are GFSI certified.
- 96.24 of Our Brands suppliers' facilities are GFSI certified in Mexico, and 94.84% in Central America.

Mexico

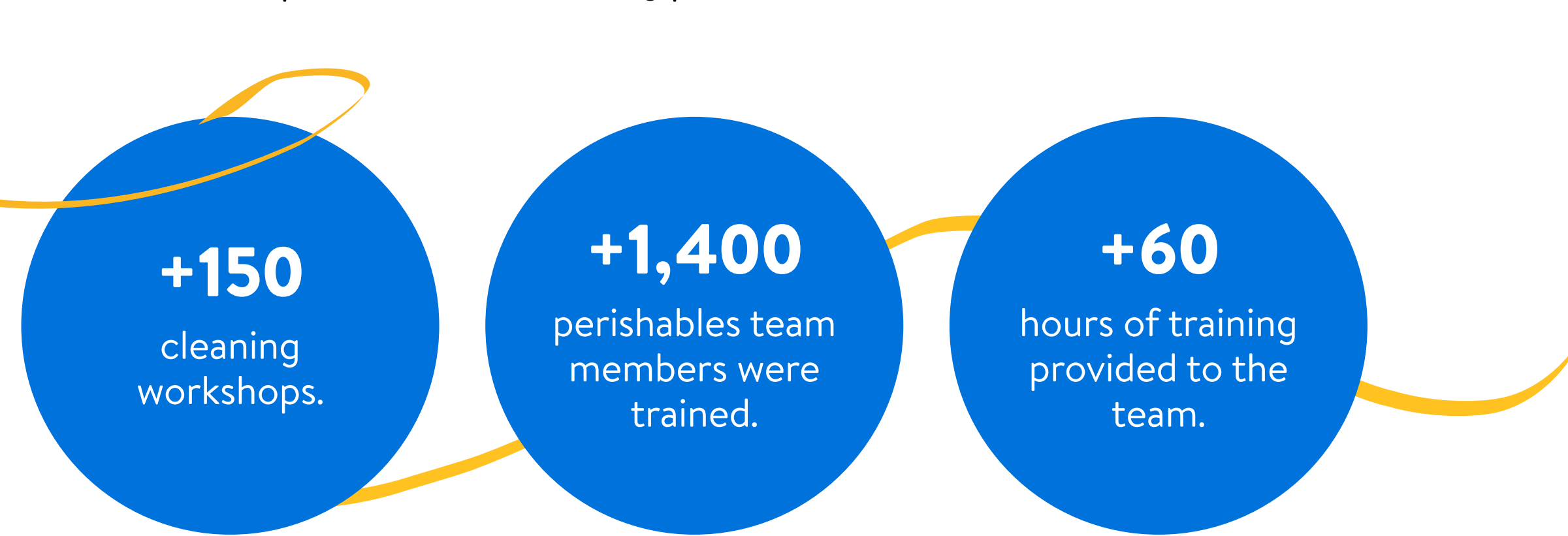
In Mexico, we relaunched our *Distintivo H* program to promote best practices in food management. We managed to certify 169 units, including Sam's Club in touristic areas, premium quality Walmart Supercenters, and the entire Walmart Express format. This program was audited by a verification body approved by the Ministry of Tourism, the Ministry of Health, and the Federal Commission for Protection Against Health Risks (COFEPRIS).

We obtained the BRC (British Retail Consortium) certification with an AA rating in four perishables DCs, consolidating our commitment to the highest food safety standards in Mexico.

We also implemented the Food Hygiene Management course, granting the DC3 certificate with official validity before the Ministry of Labor and Social Welfare to approved associates. In addition, we trained new suppliers of the Adopt an SME program in food safety and food fraud prevention.

Central America

In Central America, we strengthened our training program by adapting it to priority needs, with a particular focus on associates involved in our operations and handling perishables.



Complementing this, we have our Integral Complaint Management Program. Using Business Intelligence software, we pre-classify customer complaints and claims to optimize the service provided and ensure effective resolution. We have resolved 100% of complaints in favor of the customer.

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

Privacy

At Walmart de México y Centroamérica, the privacy and protection of personal data of our associates, customers, members, and suppliers is a priority. We align our best practices with regulatory obligations to ensure the responsible management of information entrusted to us by our stakeholders.

To further strengthen our commitment to data protection in Mexico, we carried out the following actions:

International Privacy Day: We celebrated this occasion by promoting awareness of privacy laws, policies, and personal data protection.

EPRA Standards: We adhered to Enterprise Privacy Risk Assessment (EPRA) standards to ensure the safe management of personal data.

Enhanced accessibility: We integrated a link into our privacy notice on all physical receipts of our stores and clubs. Additionally, QR codes were placed throughout our stores to provide easier access to privacy information.

In 2024, we collaborated closely with various areas and business verticals to design privacy solutions and requirements that ensure timely and accurate control over how personal data is handled.

Our constant protection of data privacy was also reinforced through continuous evaluations and improvements of our processes, ensuring that we maintain the highest security standards. During the year, we reviewed and approved 506 EPRAS in Mexico and 257 in Central America. This added up to a total of 763 between both regions.



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Automation in the management of ARCO rights

We implemented a centralized platform to manage ARCO (Access, Rectification, Cancellation and Opposition) rights, optimizing service in all our verticals. This solution, aligned with global processes and used by Walmart in the United States and Canada, marks the beginning of our transition towards global processes. Subsequently, we will integrate this platform with our information systems to fully automate the process, improving efficiency, traceability, and speed in responding to our customers.

GRI 2-27, 303-2, 303-4, 304-1, 304-2, 304-3, 304-4, 306-3

Environmental

Environmental compliance is fundamental to becoming a sustainable company. All our business activities are conducted in line with the environmental regulations applicable in each country where we operate.

We focus our strategy on reducing our environmental impact in the following areas:



Environmental Risk and Impact Management

Mexico

We performed environmental analyses for all units under construction and operation, ensuring they comply with local and national environmental regulations and standards. These analyses included monitoring wastewater discharges, emissions, and noise. We also generated compliance reports regarding the conditions established in the environmental impact and risk studies.

Central America

We have a multidisciplinary team leading initiatives in line with the optional Ecological Blue Flag program, which recognizes stores in Costa Rica with outstanding environmental performance. In 2024, five stores received this prestigious award. Furthermore, we implemented the Compliance Ambassador Green Certification, reaching 200 associates in the region.



Waste Management

Mexico

In compliance with local regulations, we eliminated plastic bags at checkout lines across all our stores and clubs nationwide. Additionally, in line with Mexico City's regulations, we now exclusively use plastic packaging and containers with lower environmental impact. Efficient logistics played a crucial role in successfully replacing single-use plastics with sustainable alternatives throughout our operations.



Wastewater

Mexico

We continued with the construction and conversion of wastewater treatment plants and biodigesters to ensure compliance with wastewater discharge regulations for water bodies classified as national assets. We also continued with the implementation of the strategic program agreed upon with the National Water Commission (CONAGUA).

Central America

We standardized and strengthened the preventive maintenance program for wastewater treatment facilities in the region. Additionally, we completed the installation of 62 automatic cleaning traps in the roasting areas in Costa Rica, with the objective of minimizing the amount of oil and grease that could affect our treatment plants.

We integrated digital logs to monitor waste generation in our stores, allowing us to obtain data more efficiently for decision-making.

GRI 416-1

Health and Wellness

The health and wellness of our customers is our priority. We strive to ensure regulatory compliance and maintain the highest quality standards in pharmaceutical products and medical care across all our establishments.

We focus on optimizing processes to provide our customers and members with agile and accessible solutions that contribute to improve their health and quality of life, ensuring that they are safe and reliable.



Mexico

- **Health web platform:** We analyzed our platform to ensure compliance with the health regulatory framework



- **Marketing plan for pharmacies:** We reviewed advertising materials related to health products and services to ensure compliance with health regulations on advertising.



- **Standards and controls for openings:** We identified the necessary health regulatory requirements for the opening of new facilities like pharmacies, distribution centers and Medical Service Centers.



- **Review and validation of health projects:** We ensured that projects within the health vertical, such as vaccine administration, rapid diagnostic tests, and health campaigns, complied with the applicable health regulatory framework.



- **Health authorizations and monitoring:** We conducted reviews and validations of health authorizations for all pharmacy suppliers and products, including health supplies, herbal remedies, food supplements, and cosmetic products. Additionally, we performed ongoing monitoring of the Marketplace to validate that all products comply with the applicable health regulatory framework.



Central America

- **Training:** We provided annual training to pharmacy personnel and trainings for the eCommerce team to ensure compliance and quality in home deliveries of medication and Pick Up services.



- **Update and standardization:** We updated pharmacy prototypes to optimize how we use its space and ensure compliance with proper facility measures. Additionally, we ensured the availability of necessary equipment to provide a high-quality customer experience.



- **Guide to Operational Excellence:** We developed and implemented this tool to comprehensively evaluate our pharmacies in terms of compliance, commercial performance, inventory management, service quality, and operational efficiency.

Financial Services and Money Laundering Prevention

We have a compliance program for Financial Services and Money Laundering Prevention that we continuously reinforce and align with Walmart's global strategy. In Mexico and Central America, we support the business strategy by ensuring compliance of financial products and services, implementing and strengthening controls and processes from their inception. Our main areas of focus are:

Money Laundering Prevention Program

This year, we unified the Money Laundering Prevention team in Mexico and Central America under a single leadership to optimize coordination. We maintained a risk-based approach from a Money Laundering Prevention perspective to review and assess processes, such as:

- **Regulatory reporting:** We enhanced the data consolidation and validation processes for preparing and submitting regulatory reports.
- **eCommerce:** We continued developing fraud alerts, training associates, and onboarding new Marketplace sellers.
- **Real Estate:** In Central America, we optimized, digitized, and tracked the consolidation and approval process in the Finance, Anticorruption, and Legal areas for new store construction projects.

Remittances

We are convinced that having the ability to receive and deliver remittances is a unique value proposition for our customers. Therefore, we implemented processes and controls to detect unusual activities and potential fraud through our monitoring mechanisms. In Central America, we successfully launched a new platform for cash remittance processing, improving controls and facilitating associates' work. This initiative optimized processing times and ensured accurate remittance payments.



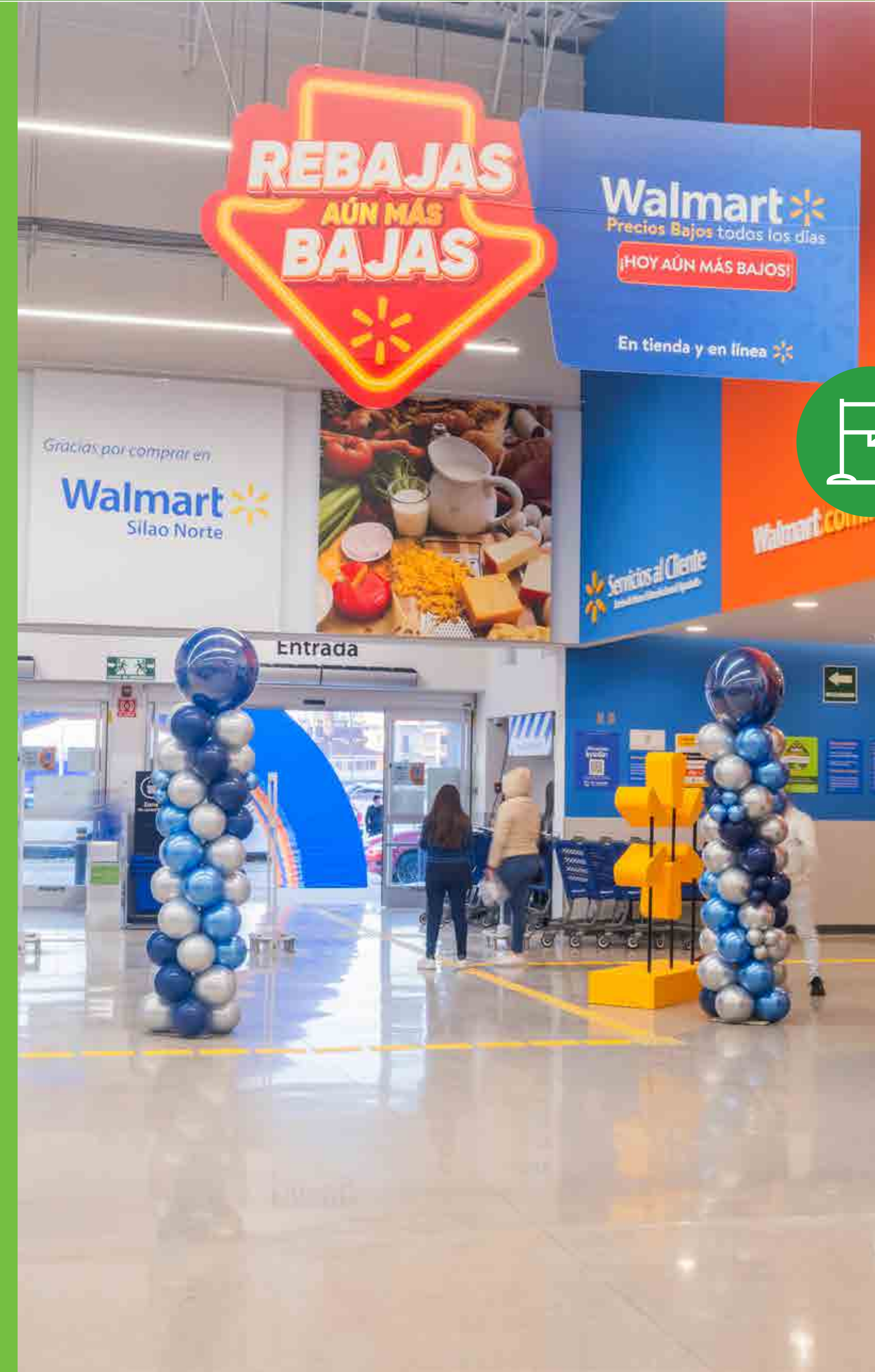
Licenses and Permits

We strive to ensure that required licenses and permits are processed and renewed in a legal, timely, and efficient manner, guaranteeing operational continuity and optimizing the shopping experience for our customers and members.

The **Global Licenses and Permits Policy** defines required and prohibited behaviors, along with the standards and controls that govern processes for obtaining, renewing, and maintaining licenses and permits across all countries where we operate.

We successfully managed more than **22 thousand** licenses for the operation and opening of new units, achieving the highest number of openings in our history.

- We renewed more than 19,500 licenses in Mexico and obtained permits for the construction and operation of 151 new business units. In Central America, we renewed and processed 100% of the construction permits required for annual growth plans, remodeling, maintenance and special projects.
- In Mexico, we managed more than 4,000 licenses for the maintenance of operational units and the development of ecosystem initiatives, including 4 Health Clinics, 11 Bait centers, and company's sustainable projects.



success STORY

Technological innovation

Our licenses and permits management process is fully documented in our Global License Management (GLM) system, covering all stages of the process. This system enhances response times and administrative efficiency. In 2024, we launched a mobile application for the GLM system, enabling associates to more efficiently and accurately manage licenses and permits.



SASB CG-MR-410A.2
GRI 416-1

Product Safety

One of our primary commitments is to guarantee the safety of the products we offer our customers and members.

Mexico

We collaborate with our suppliers to ensure each product meets the highest safety and quality standards. Our programs and strategies include:

- **Pre-shipment testing:** We implemented specific guidelines for general merchandise products, such as iron waffle and sandwich makers, ensuring that products are safe to use before reaching our customers.
- **Factory Capability and Capacity Audit (FCCA):** We trained 100% of our suppliers on critical safety guidelines and conducted semi-announced audits to evaluate preparedness. These audits are key for maintaining quality and safety across all categories.
- **Quality studies procedures:** In collaboration with the Federal Consumer Protection Agency (PROFECO), we conducted quality studies to ensure compliance, particularly with Our Brands, providing greater confidence for our customers.
- **Labeling compliance:** We communicated batch requirements for labeling general merchandise products to improve traceability and reduce the impact of possible product recalls, optimizing our logistics.
- **Inspection and laboratory manuals:** We developed manuals for inspections and laboratory testing of general merchandise, focusing on Our Brands. These manuals optimized audits, inspections, and monitoring, ensuring compliance with Mexican regulations and enhancing product safety.

Central America

In 2024, we reinforced our commitment to product safety through the following initiatives:

- **Product recalls:** We improved processes for reporting and managing recalls using internal communication tools, alert systems, and store reports.
- **Product safety monitoring:** We monitored and addressed new safety regulations for products such as refrigerators, cosmetics, stoves, and air conditioners.
- **Product labelling:** We conducted labelling reviews at points of sale and DCs, for categories such as consumer goods, toys, and home appliances. Testing guides were developed to ensure compliance with regulatory labelling standards.

We obtained over **2,400** sanitary registrations in Central America, with 61% in the grocery category and 39% in consumer and other categories.

SASB FB-FR-310A.2
GRI 402-1, 408-1, 409-1

Labor Compliance

We are committed to protecting our associates' labor rights in Mexico and Central America. We guarantee fair compensation and rest hours, as well as an environment free of discrimination and harassment. Additionally, we are constantly evolving to stay in line with new regulations and laws in the countries in which we operate.

Recently, Mexico approved the *Ley Silla* (Chair Law), which mandates the provision of seats with backrests for workers who stand for extended periods. This measure aims to improve working conditions, prevent health issues, and reduce workplace accidents. We are fully committed to complying with this ergonomic requirement, fostering a dignified and efficient work environment.

In Costa Rica, Guatemala, and Honduras, we launched the Kairós project, a new system for tracking associates' attendance, scheduling, and payment processes. Additionally, we created risk mitigation strategies and assertive communication plans to address labor contingencies raised by associates. This approach ensures labor compliance, reduces labor risks, and enhances the quality of life for our associates.

We have strengthened workday monitoring for our associates in stores, clubs, and distribution centers to ensure compliance with labor standards and improve workplace conditions.





Foreign Trade

Our Foreign Trade program consists of ensuring that the import and export of the company's merchandise complies with applicable foreign trade regulations. It ranges from the admissibility of goods to supply chain security. We address key aspects such as compliance with customs regulations, export controls, verification of certificates of origin, compliance with government regulations, rules of origin and security programs, ensuring execution aligned with international best practices.

In 2024, we implemented key initiatives that strengthened our compliance practices and raised safety and integrity standards in our operations. These actions included:

T-MEC Certificates of Origin

In Mexico, we conducted audits of the T-MEC (Mexico-United States-Canada Agreement) certificates of origin for 2022 and 2023. In addition, we developed standard operating procedures for the review and audit of certificates, as well as pre-import review guidelines.

We organized four webinars focused on the T-MEC rules of origin, in which more than 500 attendees and 135 suppliers participated. During these events, we shared essential information on the Treaty's processes and standards, including applicable criteria and the correct filling, verification, and certification of origin processes by customs authorities. These seminars not only strengthened our suppliers' technical knowledge but also broadened awareness of the importance of rigorously complying with these processes.

Authorized Economic Operator (AEO)

To streamline and facilitate our foreign trade transactions, we work to keep our supply chain secure through our Authorized Economic Operator certification (AEO), which is granted by customs authorities to economic agents participating in international trade. This is meant to strengthen the security of our foreign trade logistics chain by implementing internationally recognized security standards. One of its main goals is to prevent smuggling, terrorism, and drug trafficking, among others.

In Mexico, in 2023, we received AEO recertification effective for two years. In 2024, we maintained our compliance with the standards and obligations established by customs authorities. In Central America, we applied for AEO recertification for Walmart Costa Rica, achieving 100% compliance with applicable procedures. This reinforces our commitment to regulatory compliance in the region and strengthens our business partners' and customers' confidence.

GRI 206-1

Antitrust

Mexico

We strengthened our communication with key external audiences, such as suppliers and Marketplace sellers, to continue ensuring compliance with antitrust laws and our policies. This approach reinforces our commitment to fair competition, protecting our customers' interests, and strengthening commercial relationships.

In Mexico, during 2024, 2,181 associates were trained through in-person sessions and 847 through e-learning. In doing so, we have concentrated on appropriate communications and engagement with competitors, suppliers, and third-party vendors, as well as how to conduct our negotiations with them.

Regarding the Mexican Federal Economic Competition Commission (COFEC) investigation for relative monopolistic practices (abuse of dominance) in the "supply and wholesale distribution of consumer goods, retail marketing of such consumer goods, and related services" market, in December 2024, the authority rendered issued a final decision imposing a fine, as well as establishing certain measures comprised by different remediation actions. Although this decision is currently subject to Judicial review, our Compliance and Legal teams have been and will continue to work jointly on the implementation of these corrective measures, particularly regarding certain additions to the antitrust compliance program and the launch of a complementary reporting channel for suppliers to file complaints.

Central America

Our Merchant Town Hall was held for the third consecutive year, which addressed negotiation needs and the importance of maintaining cost-focused bilateral trade relations. We worked on aligning operations with local regulations, such as the Commission to Promote Competition (COPROCOM) guidelines in Costa Rica, by developing educational materials regarding high standards of ethics and legality. We also enabled an internal consultation channel with the Antitrust and Legal teams to support the commercial team's decision making. We will continue to promote the reporting of possible monopolistic practices within and outside the organization.

Policies and Guidelines

As part of our commitment to supporting business continuity and improvement, we maintained an internal channel for inquiries on antitrust issues from the company's teams in Mexico and Central America. Through 2025, we will continue to improve our training programs, while strengthening and implementing standards and controls to ensure that our business practices follow antitrust laws.



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

Consumer Protection

Our customers are at the center of everything we do. Therefore, it is essential to provide them with clear and accurate information about our products and services, ensuring compliance with terms and conditions, and adhering to consumer protection laws and regulations in the countries where we operate. We work to comply with labeling, advertising, and sales restrictions, as well as attending visits from authorities to verify compliance with the above, enabling customers to make informed decisions.

We deployed the following initiatives to improve consumer protection and ensure compliance with applicable regulations:

- **Advertising compliance:** In Mexico and Central America, we advertising materials to ensure that the information provided is clear, accurate, and truthful.
- **Transparency in labeling:** We monitored and review product labels and packaging in Mexico and Central America to ensure compliance and to provide customers with clear and accurate information. We are expecting the issuance of the General Law of Adequate and Sustainable Food regulations to modify Our Brands product labeling to indicate whether they contain Genetically Modified Organisms (GMOs).
- **Training:** In Mexico, the Category, Marketplace, Marketing, and Growth teams received training on general consumer protection principles. They also learned about local restrictions on sales and advertising in certain categories, such as wines and spirits.



- **eCommerce and Marketplace:** In Mexico, we monitor and ensure that the information on our websites is accurate and does not include products prohibited by applicable regulations or internal Company policies, such as offensive, discriminatory, or inappropriate products.

- **Complaints:** In Mexico, we developed a complaint escalation policy to ensure prompt and effective resolution of customer complaints in our stores. This initiative reduces friction with customers and minimizes the risk of sanctions by authorities.

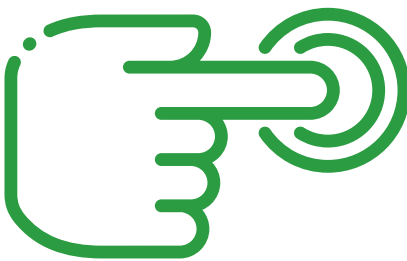
SASB CG-MR-410A.1, FB-FR-430A.1, FB-FR-430A.3
GRI 308-1, 308-2, 408-1, 414-1, 414-2

Responsible Sourcing

To advance on our path towards regeneration, we must pay special attention to our value chain, which is based on responsibility, transparency and legal compliance. We strengthen our relationships with suppliers and eradicate any conduct that may violate human or environmental rights. The prohibition of forced and child labor, non-discrimination, the prohibition of corruption and the guarantee of decent and safe jobs are our daily commitments.

In order to have a robust and clear regulatory framework, Walmart de México y Centroamérica’s Responsible Sourcing program is aligned with the following policies.

- Global Responsible Sourcing Compliance Policy.
- Global Forced Labor Prevention Policy.



The understanding and proper implementation of these policies by our suppliers are fundamental for the appropriate functioning of the program.

We trained **1,106** associates from the commercial team and other supply areas in Mexico, as well as 256 in Central America on our key Responsible Sourcing policies.

Audit and Risk Classification

Our responsible sourcing strategy is reinforced through systematic audits and risk assessments, ensuring that our suppliers comply with the highest standards.

Our suppliers must comply with one or more external audit programs approved by Walmart de México y Centroamérica.

This program uses a data-driven methodology, including the British Standards Institute indicators, to categorize potential risks in our facilities by region or territory. These categories determine the frequency and type of audit required.

Suppliers must correct any non-compliance identified in the audit report. Our Responsible Sourcing team has various options available to facilitate the search for remediation solutions.

We conducted **7,844** audits of third-party facilities in Mexico and Central America.

Audit results

4,341 audits
Mexico



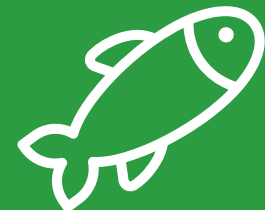
3,503 audits
Central America



We reinforced our focus on human rights by offering specific resources in the Responsible Sourcing Hub, aimed at improving practices in 10 key supply chains.



**Apparel from
Bangladesh**



**Tuna from
Thailand**



**Shrimp from
Thailand**



**Produce from
USA and
Mexico**



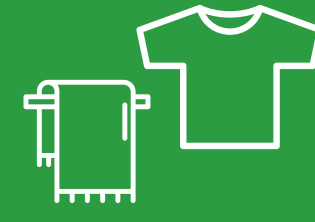
**Electronics
from Malaysia**



**Hard home
from Malaysia**



**Home textiles
and apparel
from India**



**Home textiles
and apparel
from Vietnam**



**Apparel from
Jordan**



**Apparel from
Guatemala**

This year, we also introduced a stronger environmental component, focused on driving compliance with environmental standards, establishing baselines for greenhouse gas emissions, and preparing our supply chain for regulatory changes.

Responsible Sourcing Academy

We offered training resources in multiple languages to facilitate understanding and compliance with criteria, standards and best practices.

Key issues addressed:

- Global compliance audits and guidelines.
- Prevention of forced labor.
- Safety and Hygiene.
- Supply chain controls.

481

**supplier representatives
completed training courses in
Mexico and Central America.**



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

Digital Citizenship and Information Security

Good Digital Citizens

As an omnichannel retailer, led by people and driven by technology, we use technological tools and data throughout our operation to enhance customer experience and make our associates' work easier. Our commitment to using data and technology responsibly fosters trust as we implement measures to protect personal information and ensure the security of the systems that support our operations.

We seek to build and maintain our customers, associates, suppliers, communities, and other stakeholders' trust regarding the use of technology and data, in line with our values of:



RESPECT FOR
THE INDIVIDUAL



INTEGRITY



EXCELLENCE



SERVICE



TECHNOLOGY

ENABLERS in action

We use technology to drive our strategy, accelerate growth, and optimize our operations. We automated critical processes, extending scanning to stores and DCs, implementing tokenization, and maturing security controls and network segmentation.

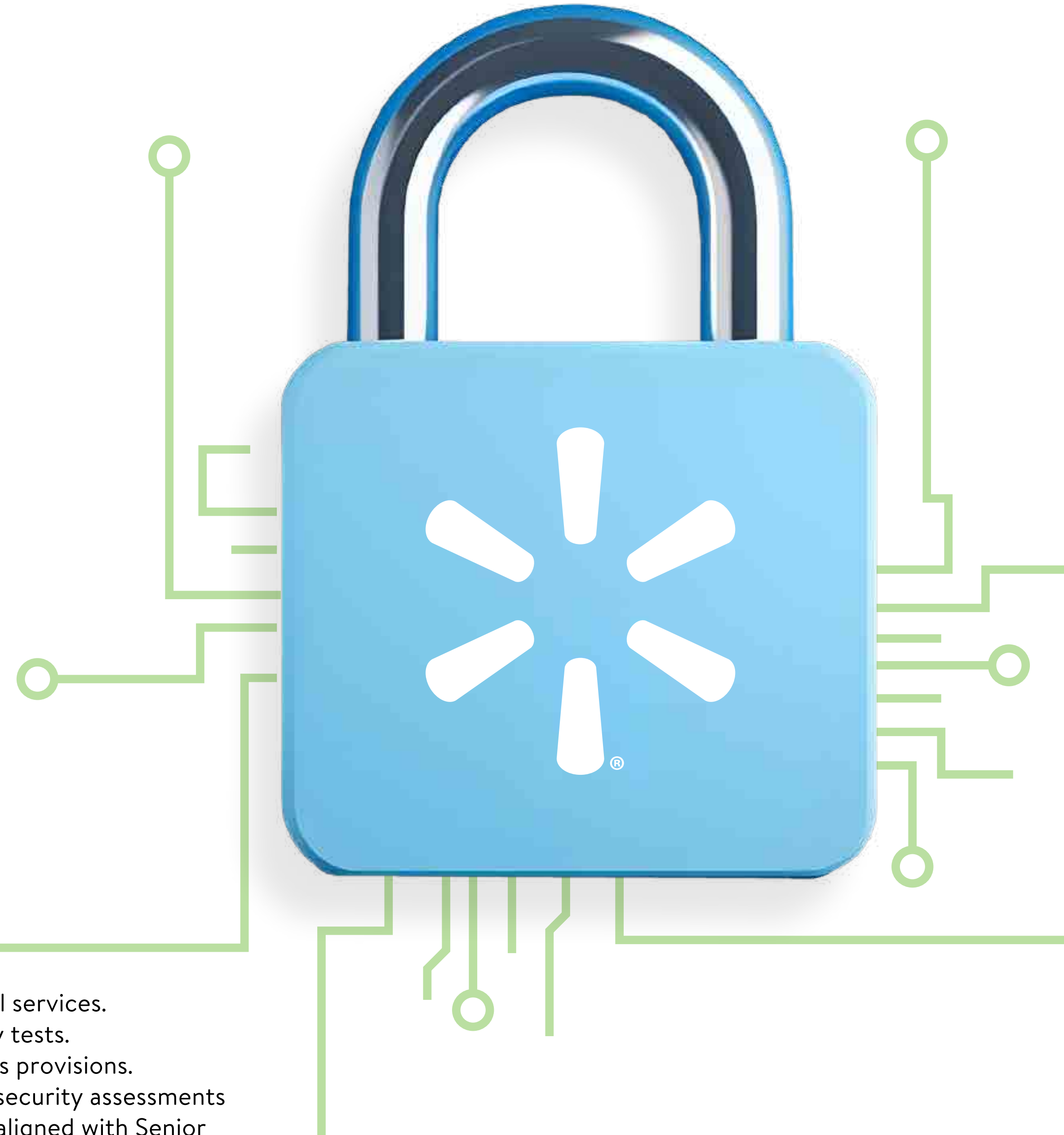
Our Technology team is focused on modernizing our technology and data platforms, thereby strengthening our profile for business continuity and recovery from technological disruptions or information security threats. In addition, our Information Security (InfoSec) initiatives create a safer operating ecosystem, protecting the reliability of our applications and data, both for the company and our stakeholders.



Investment in infrastructure strengthens InfoSec's network and operational capacity.

WE PRIORITIZE:

- Documenting critical services.
- Performing recovery tests.
- Automating accounts provisions.
- Consolidating cybersecurity assessments to define strategies aligned with Senior Management.



We put these commitments into practice through four focus areas:

1. Governance

We strengthen the proper oversight of our data and technology through responsible management.

Our Audit and Corporate Practices Committees are crucial to our Information Security strategy. They meet quarterly to review initiatives, trends, risks, and strategies to ensure the protection of the Company's information.

The magnitude and complexity of our ecosystem of products and services make us a global benchmark. Because we process millions of transactions per second, we face more than 9,400 cyberattacks annually. Therefore, in any contingency that may affect the pillars of our continuity—such as associates, facilities, systems, and third parties—we immediately activate our plans and controls to guarantee business continuity and the uninterrupted development of our activities.

2. Promotion of digital trust

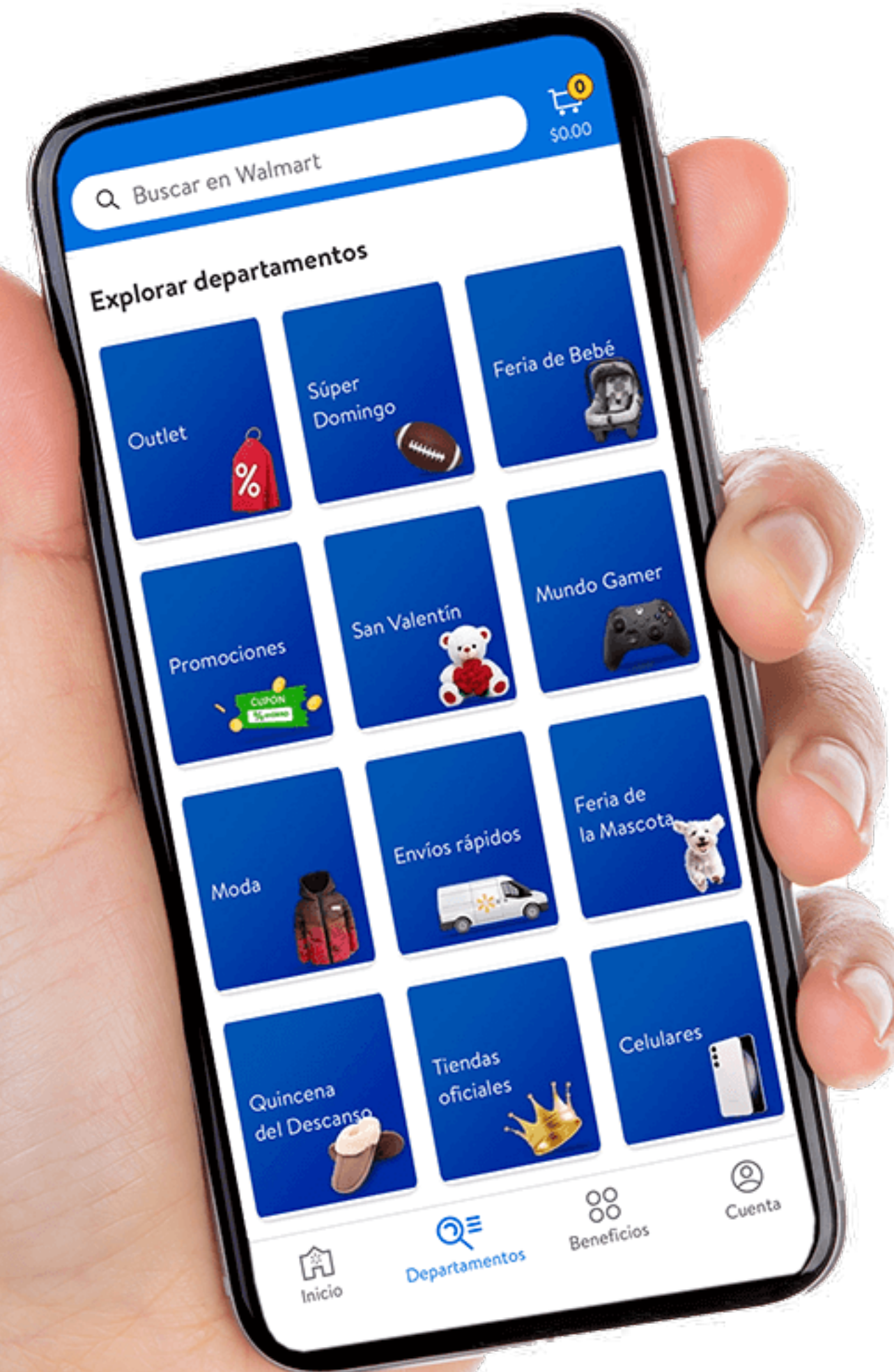
We make decisions on new technologies, services, and data use aligned with our Digital Trust commitments, focusing our digital trust efforts on the following lines of action:



Social engineering: We developed an awareness program to help end users identify potentially harmful messages on our platforms. In addition, each of our associates is required to complete annual InfoSec training.



Security risk scoring: Our enterprise information security capabilities are aligned with the National Institute of Standards and Technology (NIST). This helps us identify our risks and enables the ongoing protection of our technology assets and data.



We also develop solutions for identified risks and external audit observations through the following confidence-building mechanisms:



Information Technology (IT) Network

Structure: We implemented a network structure that aims to reduce the vulnerability of our stakeholders' sensitive data.



Access management: We conduct periodic user review reports of our applications to identify areas of opportunity or potential risk.



Change management controls: The change management process in Mexico and Central America follows the practices and controls established by our global technology policies and standards. These standards apply to our requests, tracking, and documentation of processes and changes within our common and global tools.

Responsible Artificial Intelligence: We are integrating Artificial Intelligence (AI) into several areas of our business, from improving customer, member, and associate experience, to optimizing our supply chain inventory. As the pace of innovation increases and more sophisticated AI tools are incorporated into our operations, it is critical that the people we serve feel confident and comfortable with how we use technology. At Walmart de México y Centroamérica, we have adopted policies that guide the design, implementation, and security of our AI solutions.

3. Information Security

Protecting customer and associate information to ensure confidentiality and maintain trust. We focus our information security actions on the following lines of action:

We surpassed our goal of having 80.0% of apps in production with approved SSPs, achieving **83.0%**



Data risks: Data is one of our most important assets. Our information security teams are constantly working to identify potential risks and implement mitigation measures.

Vulnerability management: Consists of preventing the persistence of security vulnerabilities that could be exploited to harm operations. Any alert is immediately escalated to prevent incidents.

Risks and key security incidents: We have a Security Operations Center that registers events that may occur in the Information Technology (IT) ecosystem. Through our processes, the Incident Response team analyzes and follows up on them until they are closed.

Certificate management: Our digital certificates enable secure transport for internal and Internet-oriented applications.

User awareness program: Through awareness and communication campaigns, we ensure that our associates and suppliers understand the risks associated with the digital ecosystem. We seek to prevent them from taking inappropriate actions, as information users, that could compromise the security of the Company, our associates, or our customers.

SSP (Solution Security Plan) Management: Our review of security processes and architecture enables product owners to implement technological solutions that comply with privacy and information security controls.

4. Cybersecurity

During the year, we strengthened our ability to proactively respond to cybersecurity risks, ensuring that our work ecosystem and confidential information always remained protected.

Lines of action:

- **Cybersecurity:** We protected our entire technological ecosystem (hardware and software), every device, and our data.
- **Data hijacking:** We conducted an exercise to simulate a ransomware attack, which allowed us to determine the strength and profile of our current tools and organizational response capabilities.

During 2024, we achieved a **28.0% reduction** in vulnerabilities derived from system penetration testing compared to 2023.





GRI 2-23, 410-1, 411-1

Human Rights

Our business is deeply connected to people: we have approximately 241 thousand associates, serve nearly 6 million customers every week in six countries, and collaborate with more than 44 thousand suppliers.

We respect human rights and leverage our collective scale, capabilities, and influence to improve the lives of people and communities, focusing on key human rights issues. Our Global Human Rights Declaration, which is aligned with international instruments such as the UN Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights, reaffirms our commitment and values. These principles are integrated into our Code of Conduct for all associates and our Standards for Suppliers.

We promote the fulfillment of Human Rights through:

- Our Human Rights Declaration, updated in 2024 and based on Walmart's values, is the foundation of our approach to human rights and reaffirms our commitment to its application.
- Governance that includes the oversight of key issues by the senior management and Board of Directors of Walmart de México y Centroamérica.
- Effective management of relevant human rights issues through policies, impact assessments, the integration of findings, performance monitoring, and addressing concerns, including remediation measures when necessary.

GRI 2-25, 2-26

Risk Assessment

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)

In our risk management and mitigation process known as ERM (Enterprise Risk Management), we generate a holistic view of risks and facilitate the exchange of best practices. This process consists of five steps and is carried out on a quarterly basis:

In each cycle, we focus on identifying and assessing the incorporation of new risks. It is therefore essential we carry out a thorough assessment of the likelihood and level of impact that a risk may have. Finally, we allocate resources to mitigation plans, ensuring they are implemented on a daily basis. In 2024, we were able to simplify risk registration with technological improvements to guarantee an efficient focus on the most critical risks for our Company and we leveraged Walmart International's experience to strengthen our mitigation plans, adapting and aligning them to the needs and context of Mexico and Central America.



1

Potential risk assessment:
Analysis and escalation of risks with internal teams.

2

Process initiation:
Risk additions or top-to-bottom eliminations.

3

Quarterly update:
Validation and calibration by risk owners and update of mitigation plans.

4

Executive Committee validation:
Discussion of relevant risks, definition of each risk's rating.

5

Board of Directors validation:
Presentation and feedback.

GRI 2-9

Corporate Governance

Our Corporate Governance guides, motivates, and accompanies us in the process of achieving our goals and objectives. The Board of Directors oversees business strategy, strategic planning, and the management of key risks that could affect the company.

SASB CG-EC-330A.3, CG-MR-330A.1

GRI 2-9, 2-10, 2-11, 2-12, 2-14, 2-17, 2-18, 2-19, 2-20, 2-21, 405-1

Board of Directors

GENERAL INFORMATION										
	Guilherme Loureiro**	María Teresa Arnal	Ignacio Caride	Ernesto Cervera	Elizabeth Kwo	Eric Pérez-Grovas	Karthik Raghupathy	Viridiana Ríos	Venessa Yates	Tom Ward
Gender	M	W	M	M	W	M	M	W	W	M
Independent		X		X	X	X		X		
Member since	2016	2022	2024	2014	2022	2018	2022	2024	2024	2021
Experience										
Accounting and auditing	*		*	*		*				
Brand and marketing	*		*						*	*
Business strategy	*	*	*	*	*	*	*	*	*	*
Corporate governance	*	*	*	*	*	*	*	*		*
Economy and finance	*	*	*	*		*	*	*		
Energy										*
Entrepreneurship	*	*	*							
Environmental, climate change, and sustainability			*							*
Ethics and integrity	*		*					*		
Health and safety			*		*					
Human resources	*		*		*				*	*
Human rights	*				*			*		
Information technologies and cybersecurity		*	*	*		*	*			*
Investor relations	*	*	*			*				
Logistics	*		*						*	
Manufacturing		*							*	
M&A			*	*			*			*
Institutional relations	*		*	*		*	*	*		
Real estate			*							*
Regulatory and legal issues			*				*	*		
Risk management	*	*	*		*	*	*	*	*	*
Sales	*	*	*	*		*			*	*

* Board of Directors as of December 31st, 2024.

**Chair of the Board

Board of Directors Composition and Meeting Frequency

1

Our Board is comprised solely by statutory members.

2

The Company and its subsidiaries' officers are limited to Executive President and Chief Executive Officer positions only.

3

Members of the Board are appointed each year by the Ordinary Shareholder's Assembly.

4

The Board of Directors meets at least four times a year. During 2024, it held seven meetings. The average meeting attendance was 94.68%.

50%

of the members are independent.

5

Independent directors must represent at least 25% of the total number of directors. As of December 31, 2024, 50% of all directors are independent.

6

The average tenure of members of the Board of Directors is three years.

7

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 end of 2024, 28% of the Company's shares were traded among the investing public.

40%

of the members are women.

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

Audit and Corporate Practices Committees

Our committees are comprised of three independent directors:

- Ernesto Cervera (Independent Director and Chairman)
- Elizabeth Kwo (Independent Director)
- Eric Pérez-Grovas (Independent Director)

Compensation and Succession Planning Committee

Our Board of Directors approved the creation of the Compensation and Succession Planning Committee at its meeting on March 30, 2023, as a key body to continue our high corporate governance standards.

The committee is composed of:

- Guilherme Loureiro (Chairman)
- Ernesto Cervera (Independent Director)
- María Teresa Arnal (Independent Director)

Main responsibilities:

- Support the Board of Directors in fulfilling its responsibilities related to the compensation and succession planning for directors, key executives, and associates.
- Recommend the type or amount of compensation for key executives and the development of succession plans for senior executives and key directors.
- Annually review and recommend corporate goals and objectives to the Board of Directors and evaluate their performance.
- Annually review and recommend to the Board of Directors compensations for Company executives in collaboration with the Chief Executive Officer.
- Have overall responsibility for reviewing the compensation and benefits structure applicable to the Company's associates.



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

Walmart de México Foundation Board of Trustees

The Walmart Foundation Board of Trustees is comprised of 12 executive members, six of whom are independent directors, and meets four times a year.

The Walmart de México Foundation is committed to providing support to the community, contributing significantly to local development through the implementation of high-impact programs.

Board Members

- Juan Carlos Alarcón
- Ignacio Caride
- Roberto Delgado
- Jorge Familiar*
- Paulo Garcia
- Julie Gherki*
- Kathleen McLaughlin*
- Raúl Quintana
- Marinela Servitje*
- Javier Treviño
- José Luis Torres*
- Adriana Velázquez

Members as of December 31st, 2024.

*Independent Members.



Diversity Guidelines for the Integration of Management and Supervisory Bodies



Ensure that recruitment processes are free of implicit bias that may imply any kind of discrimination including but not limited to gender, ethnicity, age, or disability.



Regular assessment of the level of compliance and effectiveness of their approach to diversity.



Promote an appropriate and diverse composition of our Board of Directors.



Diversity criteria will be determined according to the nature and complexity of the company's business, as well as the social and environmental context.



Seek an appropriate balance of backgrounds to bring different perspectives to discussions on certain topics and enhance decision making.



Board nominees shall be women and men who possess skills, knowledge, experience, nationalities, ages, and genders that favor diversity within the Board of Directors.