

PROCEDURES FOR COMPLAINTS RELATED TO ACCOUNTING OR AUDITING MATTERS

Walmart Inc. (“Walmart” or the “Company”) is committed to complying with all applicable laws and regulations regarding accounting, internal accounting controls or auditing matters (“Accounting Matters”). The Audit Committee of the Walmart Board of Directors is responsible for ensuring the appropriate treatment of complaints related to Accounting Matters. Therefore, the Audit Committee has adopted the following procedures consistent with those procedures under Walmart’s Statement of Ethics. These procedures are for:

- The receipt, retention and treatment of complaints regarding Accounting Matters; and
- The confidential, anonymous submission of complaints regarding questionable Accounting Matters.

Any person can submit a complaint regarding Accounting Matters without fear of dismissal or retaliation of any kind.

Receipt of Complaints

- To report a complaint regarding Accounting Matters, use one of the following methods:

Contact Global Ethics.

- **Phone.** Walmart has an ethics helpline, which allows you to report a violation on a confidential and anonymous basis.

United States, Canada or Puerto Rico: **1-800-WMETHIC** (1-800-963-8442). Specific phone numbers for all countries are listed in the Statement of Ethics.

- **Email.** Ethics@walmart.com
- **Mail.** Walmart Inc.
Attn: Global Ethics
702 SW 8th Street
Bentonville, AR 72716-0860
- **Website.** www.walmartethics.com
- Information relating to anyone making a complaint to Global Ethics will remain confidential unless otherwise required by law. The identity of anyone reporting a complaint to the ethics helpline will remain anonymous; to the extent the reporting person does not identify him or herself in the communication.
- If you reasonably suspect any impropriety regarding an Accounting Matter, you should report what is suspected. Proof is not required to raise an issue. Examples of impropriety include, among other things:
 - Fraud or intentional error in the preparation, evaluation, review or audit of any financial statement, tax return or other financial report of the Company;

- Fraud or intentional error in the recording and maintaining of financial records of the Company;
- Deficiencies in or noncompliance with the Company's internal accounting controls;
- Misrepresentation or false statements to or by a senior officer or an accountant regarding a matter contained in the financial records, financial statements, tax returns or other financial reports of the Company;
- Deviation from full and fair reporting of the Company's financial position, results of operations, cash flows, or shareholders' equity; or
- Taking any action to coerce, manipulate, mislead, or fraudulently influence the Company's external auditor in any way that would render the Company's financial statements materially misleading.

Treatment of Complaints

- Upon receipt of a complaint, Global Ethics will determine whether the complaint relates to Accounting Matters (Global Ethics may obtain the views of appropriate experts within the Company, if needed, to make this determination) and will acknowledge receipt of the report to the reporting individual via its case management system or other available methods of communication.
- Global Ethics will promptly review, analyze and assign each actionable complaint (including anonymous complaints) to an independent investigative group.
- Global Ethics will oversee the prompt and thorough investigation of all actionable ethics complaints. All complaints, if substantiated, will be resolved through appropriate corrective or disciplinary action. Due to the anonymous nature of some of the complaints, a person who reports a suspected violation may not be informed of the results of an investigation.
- Global Ethics will report each Accounting Matter complaint and, in the case of substantiated allegations, the actions taken in response thereto, if any, and provide the summary reports periodically (or more often as needed or requested) to the Audit Committee.
- The Audit Committee has the power to take any appropriate action including, among other things to: (1) refer the matter to the full Board of Directors; (2) further investigate the matter; (3) direct that further internal investigation be conducted; or (4) retain outside counsel, accountants or other third-party advisors to investigate.

Reporting and Retention of Complaints and Investigations

- The Audit Committee will report to the full Board of Directors periodically the results of investigations, if any, or, if the Audit Committee deems appropriate, the details of pending investigations.
- Global Ethics will track and retain all complaints received and the resolutions of those complaints, whether or not they relate to an Accounting Matter.