

## REPORTING PROTOCOLS FOR SENIOR FINANCIAL OFFICERS

Walmart Inc. (“Walmart”) has a Code of Conduct applicable to all associates. The Senior Financial Officers are bound by the provisions set forth therein relating to honest and ethical conduct, conflicts of interest and compliance with all laws. In addition to the Code of Conduct, the Senior Financial Officers are subject to the additional specific policies and reporting protocols set forth below. If the CEO, the CFO or Corporate Controller has a reporting obligation under any policy set forth below, he or she must promptly bring the matter to the attention of Global Ethics and the Audit Committee. If any other Senior Financial Officer has a reporting obligation under any policy set forth below, such Senior Financial Officer must promptly bring the matter to the attention of (A) his or her immediate supervisor and Global Ethics or, if appropriate, (B) the Audit Committee.<sup>1</sup> For the purposes of these Reporting Protocols, the term “Senior Financial Officer” shall mean the CEO, CFO, Corporate Controller, officers in Accounting, Finance and Tax areas, Chief Executive Officers who are responsible for an operating division, and officers in operating divisions who are responsible for accounting.

1. All Senior Financial Officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company with the Securities and Exchange Commission. Accordingly, it is the responsibility of each Senior Financial Officer to report any untrue statement of material fact and any omission of material fact of which he or she may become aware pertaining to information prepared by him or her or associates in his or her area(s) of responsibility that affect the disclosures made by the Company in its public filings.
2. Each Senior Financial Officer shall report any information he or she may have concerning (a) significant deficiencies in the design or operation of disclosure and internal controls which could adversely affect the ability of associates in his or her area(s) of responsibility to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves any associate who has a significant role in his or her area’s internal controls.
3. Each Senior Financial Officer shall report any information he or she may have concerning any violation of these Reporting Protocols.
4. Each Senior Financial Officer shall report any information he or she may have concerning evidence of a material violation of securities or other laws, rules or regulations applicable to the Company and the operation of its business, by the Company or any agent thereof.
5. Global Ethics or the Audit Committee, as appropriate, shall determine, appropriate actions to be taken in the event of violations of these Reporting Protocols. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to these Reporting Protocols, including, among other things, disciplinary action up to and including termination of employment. In determining what action is appropriate in a particular case, Global Ethics or the Audit Committee, as appropriate, shall take into account all relevant information, including whether the violation was promptly reported, whether a violation of the law has occurred, the

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<sup>1</sup> A Senior Financial Officer always has the option of reporting directly to the Audit Committee, and such officer shall report to the Audit Committee if he or she has reason to believe that his or her immediate supervisor or Global Ethics is involved with the matter at issue, or if he or she has reason to believe that his or her immediate supervisor or Global Ethics has not addressed the matter appropriately in a timely fashion.

nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past, the penalties imposed, if any, in the past for comparable violations and other relevant factors. Global Ethics and the Audit Committee may obtain the views of appropriate experts in this determination and/or instruct the appropriate experts to undertake any activities or actions with respect to investigations under these Reporting Protocols.

These Reporting Protocols were last amended effective February 1, 2021.