

# Global Anti-Corruption Policy 全球反腐败政策

**Effective: June 29, 2012**

**Last Reviewed: January 22, 2021**

Walmart Inc. and its subsidiaries and affiliates worldwide (collectively "Walmart" or the "Company"), are committed to maintaining the highest possible ethical standards and complying with all applicable laws. In all of its operations, Walmart seeks to avoid even the appearance of impropriety with respect to the actions of any of its officers, directors, associates, employees, agents or representatives. This policy prohibits corrupt payments in all circumstances, whether in dealings with government officials or individuals in the private sector. Walmart Inc.及其全球子公司和关联公司（统称“沃尔玛”或“本公司”）一直致力于遵循最高标准的道德规范以及恪守所有适用法律。在沃尔玛的所有运营活动中，即使是其任何高管、董事、员工、雇员、代理或代表的看似不当的行为，沃尔玛也一直力图避免。本政策规定，任何情况下均禁止腐败付款，无论涉及政府官员或私营公司的个人。

## General Directives 总则

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It is the policy of Walmart to comply with all relevant Anti-Corruption laws including, but not limited to, the US Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act. 沃尔玛的制度是遵守所有相关的反腐败法律，包括但不限于美国《反海外腐败法》（“FCPA”）和英国《反贿赂法案》。

Accordingly, Walmart prohibits anyone acting on behalf of the Company, directly or indirectly, from making or receiving improper payments. 因此，沃尔玛禁止任何个人以本公司的名义，直接或间接支付或收取不当付款。

Improper payments means receiving or paying bribes or giving, offering, or promising to give money or anything else of value to any person, including any Government Official, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the Company. 不当付款系指为了能够对个人的任何行为或决定产生不当影响，或是为本公司谋取不当利益，而收取或支付贿赂款，或者给予、提出提供或承诺提供任何人（包括任何政府官员）金钱或任何有价财物。

A Government Official may include, but is not limited to, any officer or employee of a foreign government, a public international organization, a member of a political party, a candidate for foreign political office, any foreign government department or agency thereof, or any official or employee of a state-owned business enterprise. 政府官员包括但不限于外国政府、国际公共组织的任何官员或工作人员，政党成员，外国公职、任何外国政府部门或政府机构的候选人，或者国有企业的任何领导或雇员。

The use of Walmart funds or assets for any illegal, improper, or unethical purpose is strictly prohibited. 严禁将沃尔玛的资金或资产用于任何非法，不当或不道德的目的。

Compliance with this Global Anti-Corruption Policy (the "Policy") is required of all associates and third parties that are engaged to interact or may interact with government officials on the Company's behalf. All associates are responsible for ensuring that third parties with whom they interact fully understand and follow the policy and associated procedures in their activities related to Walmart business. 代表或可能代表本公司接触政府官员的员工和第三方须遵守全球反腐败

政策（“政策”）。所有员工有责任确保他们接触的第三方完全了解政策和相关程序，并在其有关沃尔玛业务的活动中遵守政策和相关程序。

## Violations

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Any associate or third party who violates this policy in connection with Walmart business will be subject to disciplinary measures, up to and including termination in the case of an associate, or termination of business relations in the case of a third party and, where appropriate, referral of the matter to relevant law enforcement authorities. 如任何员工或第三方出现有关沃尔玛业务的本政策违规行为，均应受到纪律处分，包括终止与员工的雇佣关系，或终止与第三方的业务关系。在适当情况下，可上报相关执法机构。

## Global Implementation of Anti-Corruption Program 全球反腐败计划实施

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To effectively implement this policy, Walmart shall maintain an effective risk-based Global Anti-Corruption Program (the "Program") designed to prevent, detect, and remediate bribery and recordkeeping violations. As part of the program, Walmart shall adopt operating procedures specifically targeted to the corruption risks that exist for all of its operations, worldwide. Management in each affected area shall be responsible for ensuring that adequate resources are devoted to maintaining effective compliance programs. A senior executive at Walmart Inc., shall be given overall responsibility for the Program, and shall report regularly to the Audit Committee of the Board of Directors of Walmart Inc., which shall exercise reasonable oversight as to the implementation and effectiveness of the Program. 为有效实施本政策，沃尔玛应保有有效的基于风险的全球反腐败计划（“计划”），旨在预防、发现和纠正贿赂和违规记录。作为该计划的一部分，本公司应采用特别针对全球运营腐败风险的操作程序。各所属区域的管理层应确保投入足够的资源，用于保有有效的合规计划。WalMart Inc.的一名高层管理人员应当全面负责该计划，定期向负责合理监控以确保该计划有效实施的WalMart Inc.董事会的审计委员会报告。

The procedures and governance used to implement this policy, shall include, at a minimum:

为实施该政策，应至少包括下列程序和管理方法：

- Effective controls on the disbursement of funds and other assets to ensure that disbursements are not made for improper purposes; 有效控制资金和其他资产的支出，以防止不当支付；
- Measures to ensure that books and records accurately reflect the disposition of assets; 采取措施，确保账目和记录准确反映资产处置；
- Clearly articulated standards of behavior as included in Walmart's Code of Conduct, which shall be well publicized to all of Walmart's operations, worldwide; 明确阐述沃尔玛道德操守规范中包含的行为标准，并向沃尔玛全球所有运营单位宣传；
- Clearly defined roles, responsibilities, and reporting lines for day-to-day management and implementation of the compliance procedures; 明确规范日常管理以及合规程序履行过程中的任务，责任和汇报流程；
- Effective training of executives, associates and, where appropriate, third parties regarding relevant anti-corruption standards and procedures; 就相关反腐败标准和程序有效培训管理人员、员工和第三方（若适当）；
- Testing by Internal Audit or a third party for compliance with the anti-corruption procedures, including review of expenditures for operations that interact with government officials; 由内部审计部或第三方检查反腐败程序的遵守情况，包括审查与政府官员往来的支出；
- Corruption risk assessments conducted annually; 每年进行腐败风险评估；
- Conducting due diligence of third parties engaged to interact with government officials on behalf of the Company; 对聘请的代表本公司接触政府官员的第三方展开尽职调查；

- Effectively publicized means to report or seek guidance on actual or potential anti-corruption issues, as well as procedures for responding to such reports or requests; 有效宣传举报实际或潜在反腐败问题或就此寻求指示的方式，以及该等举报或请求的响应程序；
- Regular review and, if necessary, revisions or updates to this policy and to the related procedures where appropriate, including in response to legal, regulatory, or industry changes or violations of the Anti-Corruption Policy; 定期审查，并在必要时修改或更新本政策和相关程序（若合适），包括对相关法律、监管、行业变化或反腐败政策违规的响应；
- Appropriate incentives and punishments for associates, executives and third parties for adherence to or violations of, respectively, the relevant policy and related procedures. 就遵守或违反各相关政策和相关程序，而对员工、管理人员和第三方采取适当的奖惩措施。

## Reporting 举报

Every associate or third party who has information that this policy or related procedures may have been violated, or believes he or she is being asked to pay a bribe or receive a bribe, or otherwise act in contravention of this policy shall immediately report the event directly to Global Ethics and Compliance. 任何员工或第三方中介如知晓可能已经违反本政策或相关程序的情况，或确信自身被要求支付或收取贿赂，或是被要求做出其他违反本政策的行为，须立即直接向全球道德与合规部举报该事件。

All reports to Ethics & Compliance are treated as confidentially as possible. It helps with follow-up if you identify yourself. If you are not comfortable identifying yourself, you can make anonymous reports to the Ethics Helpline to the extent allowed by law. 所有提交给道德与合规部的举报都尽可能保密处理。如果您表明自己的身份，将有助于后续工作的进行。如果不愿意表明自己的身份，您将可以在法律允许的范围内向道德热线进行匿名举报。

Contact information for Global Ethics & Compliance is contained in the box below: 向全球道德与合规部进行举报的联系方式如下所示：

Reporting Violations or Solicitations 举报违规或索贿行为
<p><b>Walmart's Global Ethics Helpline 全球道德热线</b>  <b>Tel 电话: 800-WM-ETHIC</b>  <b>(800-963-8442) (in the U.S., Canada, and Puerto Rico, or your local phone number which is listed at the end of our Code 美国、加拿大和波多黎各境内请致电 800-963-8442, 您当地的电话号码请查阅道德操守规范末尾):</b></p> <p><b>Mail: Attention: Global Ethics &amp; Compliance, 702 SW 8<sup>th</sup> Street, Bentonville, AR 72716-0860</b>  <b>邮寄：收件人：Global Ethics &amp; Compliance, 702 SW 8<sup>th</sup> Street, Bentonville, AR 72716-0860</b></p> <p><b>Web 网址: <a href="http://www.walmartethics.com">www.walmartethics.com</a> or</b>  <b>Email 邮箱: <a href="mailto:ethics@walmart.com">ethics@walmart.com</a></b></p> <p><b>Specific country contact information can also be found on <a href="http://www.walmartethics.com">www.walmartethics.com</a></b>  <b>请登陆 <a href="http://www.walmartethics.com">www.walmartethics.com</a> 查找各个国家的联系方式</b></p>

Reporting an issue in good faith will not get you in trouble, even if you make an honest mistake. Knowingly reporting false information is contrary to our values and will be subject to disciplinary action. Also, anyone who reports a suspected violation may be subject to disciplinary action to the extent he or she violated any Walmart policy or procedure. 善意举报问题不会让您陷入麻烦，即使您犯了一个诚实的错误。故意报告虚假信息与我们的价值理念相悖，将会受到纪律处分。另外，若举报疑似违规行为的任何人违反沃尔玛的任何政策或程序，则可能遭受纪律处分。

This information does not create an express or implied contract of employment or any other contractual commitment. Walmart may modify this information at its sole discretion without notice, at any time, consistent with applicable law. Employment with Walmart is on an at-will basis, which means that either Walmart or the associate is free to terminate the employment relationship at any time for any or no reason, consistent with applicable law.

**Last Modified: January 22, 2021**