

GLOBAL ANTI-MONEY LAUNDERING POLICY

POLICY STATEMENT

We are committed to complying with all anti-money laundering laws applicable to our global operations and to maintaining robust programs designed to prevent the company from serving as a conduit for money laundering. Our efforts raise the quality of life in the communities in which we work and serve around the world by helping to decrease the social and economic impact of crime.

Money laundering is the process of taking criminal profits and attempting to make them appear legitimate. This involves concealing or disguising the nature, location, source, ownership, or control of the funds. Such activity can involve financial products and services we offer to our customers (such as stored value instruments, money orders, and money transfers), retail and wholesale consumer transactions, as well as corporate transactions (such as the purchase or sale of merchandise and real estate).

WHAT TO DO

FOLLOW POLICIES regarding acceptable forms of payment for your line of business.

REPORT AND SEEK GUIDANCE from your Compliance or Ethics department if you identify suspicious behavior or activity.

COMPLY with all applicable laws and company policies and procedures that address money laundering and terrorist financing and follow requirements for the reporting of large cash or suspicious transactions.

LOOK FOR RED FLAGS of structured or unusual payments.

UNDERSTAND the application of company policies, procedures, and local industry best practices to your area of responsibility.

KNOW YOUR CUSTOMERS AND BUSINESS PARTNERS and be familiar with their typical behaviors, transactions, and payment patterns to identify suspicious activity.

WHAT TO LOOK FOR

BREAKING DOWN OR ALTERING PAYMENTS or transactions to avoid customer identification, recordkeeping, or reporting requirements, or offers of tips or payments to avoid such requirements.

UNUSUAL VOLUME OR FREQUENCY of financial services transactions inconsistent with the customer's profile or without any apparent legitimate purpose.

TRANSACTIONS CONDUCTED UNDER THREAT OF PHYSICAL HARM to avoid requirements, violate policies or procedures, or accept unusual payments.

REQUESTS FOR EXCEPTIONS TO PAYMENT POLICIES by vendors or suppliers, including requests for payment in cash or transfers to/from unrelated third- parties.

PROVIDING FALSE INFORMATION or reluctance to provide complete information (including beneficial ownership) by vendors, suppliers, business partners or customers.

Asking Questions and Reporting Violations

To ask a question about this policy or to report a suspected violation of this policy, please contact a member of Management, the Compliance department, or the Legal department.

You may also report suspected violations by contacting Walmart's Global Ethics Helpline:

1-800-963-8442

Web: www.walmartethics.com or Email: ethics@wal-mart.com

Reports to the Ethics Helpline are always confidential, and if you choose, you may report your concern anonymously.

Additional specific country contact information can also be found on www.walmartethics.com.

In the U.S., you may also use the U.S. Compliance Hotline for questions: 1-800-530-9923