



4th Annual

CORPORATE
LEARNING WEEK

International Ethics and Compliance Training Simplified

**Jennifer Buchanan, Senior Director, International Ethics and
Compliance Training and Awareness, Walmart International**



4th Annual

CORPORATE LEARNING WEEK

- Strategies to simplify training programs through audience identification, localization, and brand awareness.

International Ethics & Compliance Training

—————→ **Simplified**

Jennifer Buchanan
Senior Director, Walmart International



Culture is not



Buildings



Processes



Meetings



Branding



Our Evolution

1962-1964

WALMART

1964-1981

WAL-MART

1968-1981



1981-1992

WAL-MART

1992-2008

WAL★MART®



Walmart



Save money. Live better.

Culture

noun cul·ture \ 'kəl-chər\

The **beliefs, customs**, arts, etc., of a particular society, group, place, or time

A particular society that has its own beliefs, ways of life, art, etc.

A way of thinking, behaving, or working that exists in a place or organization

Source: Merriam-Webster's Learner's Dictionary



“How we work”

Shared attitudes,
values, goals,
and practices



“Our culture is the engine that drives our results. Our behaviors...these little things make us special and add up to our success and our future.”

Doug McMillon, CEO



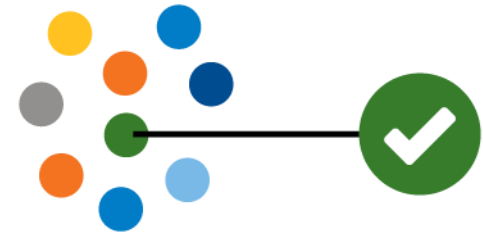
Don't Get Lost In Translation



Localize, don't
just translate



Calibrate
message



Simplify
guidance



Cookie in vanilla
ice sanded by
cookie



Anti-Corruption 4 Keys



Bribery: Bribery is a payment/receipt, the offer of a payment, a promise of a payment, or the authorization of a payment of anything of value to/from a government official or private entity/individual in exchange for a favorable outcome or benefit to Massmart Wal-Mart. A bribe does not have to be successful to violate local and international laws or Massmart's and Wal-Mart's Anti-Corruption Policy!

- What is a bribe: money, travel, gifts, or personal favors (such as employment for relatives)
- Bribes and solicitations (requests) for bribes come in many forms and may appear in less direct and subtle ways. Here are a few examples of bribes and solicitations for bribes:
 1. A store manager offers a cash payment to a charity operated by a building inspector's wife in order to secure a permit needed to re-open a store;
 2. A government official tells an associate "I know that it may cause you problems if I issue you a fine for failing to keep your freezers at the appropriate temperature, but I am sure that we can work something out";
 3. A government official tells an associate "My wife and I are going to lunch after I finish your store's inspection, and lunch costs are high. If someone wanted to help me out with lunch, his or her store's inspection report would be favorable"; or
 4. A government official tells an associate "Based on my inspection, it appears that you have several fire safety violations. Did you know that my son is looking for a job? If my son worked for you, I am sure that you'd be happier with my inspection results."



Donations: If you make a donation or receive a donation request, please follow Massmart's Anti-Corruption Donation Procedure. If you have any questions regarding donations, please contact Johann Stander, Massmart Anti-Corruption Executive, at ajhelpline@massmart.co.za.



Petty Cash: Petty Cash is operating cash used by a store to directly pay for store related expenses. Please follow Massmart's procedures for all Petty Cash transactions.



Reporting: Always remember, (1) we decline all requests for bribes; and (2) all such solicitations must be reported, even if the solicitation was declined. All bribes, whether successful or not, and solicitations for bribes must be reported immediately to:

South Africa: 0800 20 32 46
Africa: +27 31 571 5488
SMS: 32846
E-mail: Massmart@ethics-line.com
Website: <http://www.walmartethics.com>
Fax: 800 00 77 88
Post: KZN 138, Umhlanga Rocks, 4320

**IF YOU HAVE ANTI-CORRUPTION QUESTIONS,
PLEASE CONTACT YOUR LOCAL ANTI-CORRUPTION TEAM.**



Anti-Corruption Compliance Keys

Anti-Corruption 4 Keys



Bribery: Bribery is a payment/receipt, the offer of a payment or the authorization of a payment of anything of value to an entity/individual in exchange for a favorable outcome or action. A bribe does not have to be successful to violate local laws and Wal-Mart's Anti-Corruption Policy!

- What is a bribe: money, travel, gifts, or personal services for relatives)
- Bribes and solicitations (requests for bribes come in less direct and subtle ways. Here are a few examples for bribes:
 1. A store manager offers a cash payment to an inspector's wife in order to secure a permit.
 2. A government official tells an associate "I'll issue you a fine for failing to keep your fire extinguisher but I am sure that we can work something out."
 3. A government official tells an associate "I'll finish your store's inspection, and lunch comes out with lunch, his or her store's inspection."
 4. A government official tells an associate "Be sure you have several fire safety violations. Did you have a job? If my son worked for you, I am sure inspection results."



Donations: If you make a donation or receive a donation, please follow Massmart's Anti-Corruption Donation Procedure. If you have any questions, please contact Johann Stander, Massmart's Anti-Corruption Line at ac@helpline@massmart.co.za.



Petty Cash: Petty Cash is operating cash used by employees for expenses. Please follow Massmart's procedures for all petty cash transactions.



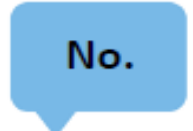
Reporting: Always remember, (1) we decline all requests for bribes and (2) all solicitations must be reported, even if the solicitation was not successful or not, and solicitations for bribes must be reported to the Anti-Corruption Line.

South Africa: 0800 20 32 46
 Africa: +27 31 571 5468
 SMS: 32846
 E-mail: Massmart@ethics-line.com
 Website: <http://www.walmartethics.com>
 Fax: 800 00 77 88
 Post: KZN 136, Umhlanga Rocks, 4320

IF YOU HAVE ANTI-CORRUPTION COMPLIANCE QUESTIONS, PLEASE CONTACT YOUR LOCAL ANTI-CORRUPTION LINE.



Never pay bribes. Even small bribes are prohibited.



If you're asked for a bribe, say no and report it.



Report all bribes and requests for bribes.

What is a bribe?

Anything of value, including:



Gift Cards



Favors or Donations



Cash



Gifts or Products

Follow all procedures



Donations



Petty Cash



Inspections



Report all bribes and requests for bribes

Phone: 555-555-4321
 Fax: 555-867-5309
 Email: ac_compliance@walmart.com



Get guidance on Anti-Corruption questions

Phone: 555-555-4321
 Fax: 555-867-5309
 Email: ac_compliance@walmart.com



DRAFT v1

Antitrust Compliance Keys



Need help?

Contact your **Antitrust Expert**,
[Person's Name]

Phone: +1 (407) XXX-XXXX

Email: info@walmart.com

Win for the customer



Negotiate with suppliers for lower costs, better quality, or faster innovation



Focus supplier discussions on cost, not retail price—retail prices are Walmart's decision

Keep it confidential



Never share future pricing information outside of Walmart—with anyone



Never discuss Walmart business with competitor employees, and make sure suppliers know to do the same

Compete with integrity



Don't ask for or accept commercially sensitive information about competitors from our suppliers or others



Don't use shared suppliers to influence or communicate with competitors—and report it if a competitor tries to do this



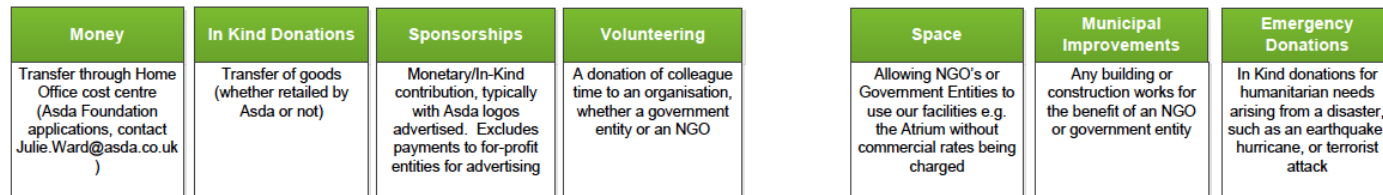
Anti-Corruption Summary Guide: Asda Donations and Sponsorships

Asda are committed to supporting good causes through donations and sponsorships

This guide summarises key processes to be followed to ensure that the WalMart International Giving Procedures are complied with when making a donation or sponsorship

1. What are the key processes for making a donation or sponsorship?

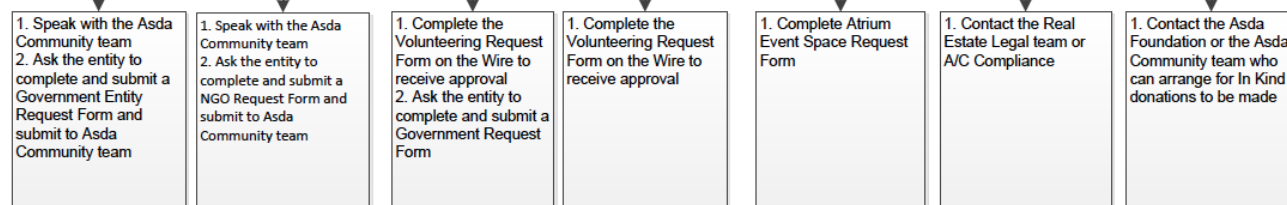
(a) If I want to make a donation of....



(b) And I would like to make it to....

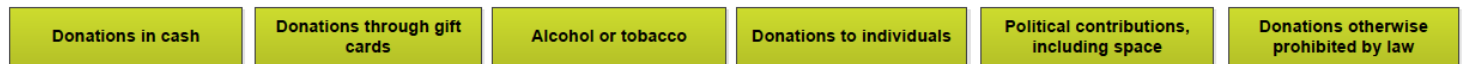


(c) Then I need to...



* Government entities includes all elements of the public sector, including (but not limited to) state funded schools, hospitals, community centres

2. What are we not allowed to do? The following donations and sponsorships are prohibited:



Anti-Corruption Compliance Team Key Contacts: Andrew Howard (andrew.howard@asda.co.uk), Suve Banerjee (Suve.Banerjee@asda.co.uk), Keith Needham (Keith.Needham@asda.co.uk), Jessica Smith (Jessica.Smith@asda.co.uk)



How We Handle Donations at ASDA

We Never Donate



Cash/Gift Cards



Anything to an individual or a political cause



Alcohol/Tobacco

We Follow Our Approval Processes to Donate

Volunteer Time



- 1 Complete the Volunteering Request Form on the wire
- 2 If volunteering for any government or public-sector entity, ask them to fill out a government request form

Space/Facilities



- 1 Complete Atrium Event Space Request Form

Money, Goods, Sponsorships



- 1 Speak with the ASDA Community Team
- 2 Ask the Entity to fill out the appropriate form (Government or NGO)

Construction Work



- 1 Contact Real Estate Team or A/C Compliance

Anti-Corruption Summary Guide: Asda Donations and Sponsorships

Asda are committed to supporting good causes through donations and sponsorships. This guide summarises key processes to be followed to ensure that the WorldMarket International Giving Procedures are complied with when making a donation.

1. What are the key processes for making a donation or sponsorship?

(a) If I want to make a donation of...

Money	In Kind Donations	Sponsorships	Volunteering	Space	Mutualist Sponsorships
Transfer through Interim (Share Issue) or Asda Foundation applications, contact Julie.Ward@asda.co.uk	Transfer of goods (please refer to Asda or not)	Manufacturer/NGO contribution, typically with Asda logo, advanced. Excludes payments to for-profit entities for advertising	A donation of colleague time to an organisation, whether a government entity or an NGO	Allowing NGOs or Government Entities to use our facilities as the primary benefit of the donor without commercial value being charged	Any building or construction activity the benefit of an NGO or government entity

(b) And I would like to make it to...

Government	NGO	Government	NGO	Government or NGO	Government
1. Speak with the Asda Community Team 2. Ask the entity to complete and submit a Government Entity Request Form and submit to Asda Community Team	1. Speak with the Asda Community Team 2. Ask the entity to complete and submit a NGO Request Form and submit to Asda Community Team	1. Complete the Volunteering Request Form on the Wire to request approval 2. Ask the entity to complete and submit a Government Request Form	1. Complete the Volunteering Request Form on the Wire to request approval 2. Ask the entity to complete and submit a Government Request Form	1. Complete Atrium Event Space Request Form	1. Contact the Real Estate Legal team or A/C Compliance

(c) Then I need to...

Government entities includes all elements of the public sector, including but not limited to state funded schools, hospitals, community centres.

2. What are we not allowed to do? The following donations and sponsorships are prohibited:

Donations in cash	Donations through gift cards	Alcohol or tobacco	Donations to individuals	Political contributions, including space
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Anti-Corruption Compliance Team Key Contacts: Andrew Haines (andrew.haines@asda.co.uk), Steve Barragan (steve.barragan@asda.co.uk), Keith Woodhams (keith.woodhams@asda.co.uk), Jessica Smith (jessica.smith@asda.co.uk)



Know your audience



Matrix job functions to training requirements



Use technology when appropriate





Anti-Money Laundering



Key Objectives

Understand importance and processes for "Know Your Customer" Familiarity of regulatory reporting and recordkeeping requirements

Recognize financial controls

Understand transaction monitoring and case management



Baseline Training

Topics

- Money laundering defined
- AML key requirements and enforcement
- AML Program components
- AML red flags

Audience

- Finance
- Financial Services
- Assets Protection
- Real Estate
- Treasury
- Legal
- Audit
- Operations
- Merchants



Baseline + Advanced Training

Topics

- Content covered in baseline training
- AML technical training
- Regulatory expectation needs in market

Audience

- Financial Services
- Real Estate
- Treasury
- Legal
- Audit
- Operations



Training Audience Matrix




Function	Anti-Corruption	AML	Antitrust	Consumer Protection	Environmental	Ethics	Food Safety	Health & Safety	Health & Wellness	License & Permits	Labor & Employment	Privacy	Product Safety	Trade
Administration						✓								
Asset Protection		✓				✓							✓	
Audit	✓	✓				✓		✓						
Buyers			✓	✓		✓								✓
Compliance	✓					✓		✓						
Corporate Affairs	✓					✓								
Customs	✓	✓				✓								
Ethics	✓		✓			✓								
Finance	✓	✓				✓								✓
GISAT	✓					✓		✓						
Global Sourcing	✓					✓								✓
Human Resources	✓					✓		✓				✓		
Importers/Exporters						✓								✓
Legal	✓	✓	✓		✓	✓				✓	✓	✓		
Logistics						✓								✓
Marketing						✓								
Merchants		✓	✓			✓								
Operations	✓	✓	✓		✓	✓	✓	✓		✓	✓	✓	✓	
Real Estate	✓	✓				✓		✓			✓			
Safety						✓	✓	✓						
Supply Chain	✓					✓		✓						
Systems						✓								
TPIs	✓					✓				✓				
Treasury		✓				✓								

*For illustrative purposes



Leverage Branching

Anti-Corruption Home Office

Course Progress 60%

Choose your Role

Walmart faces unique risks based on the nature, scale, and complexity of business activities in each of the countries in which it operates.

*Select the business unit below that corresponds to your current role with the company and click **Continue**.*

Real Estate

Finance

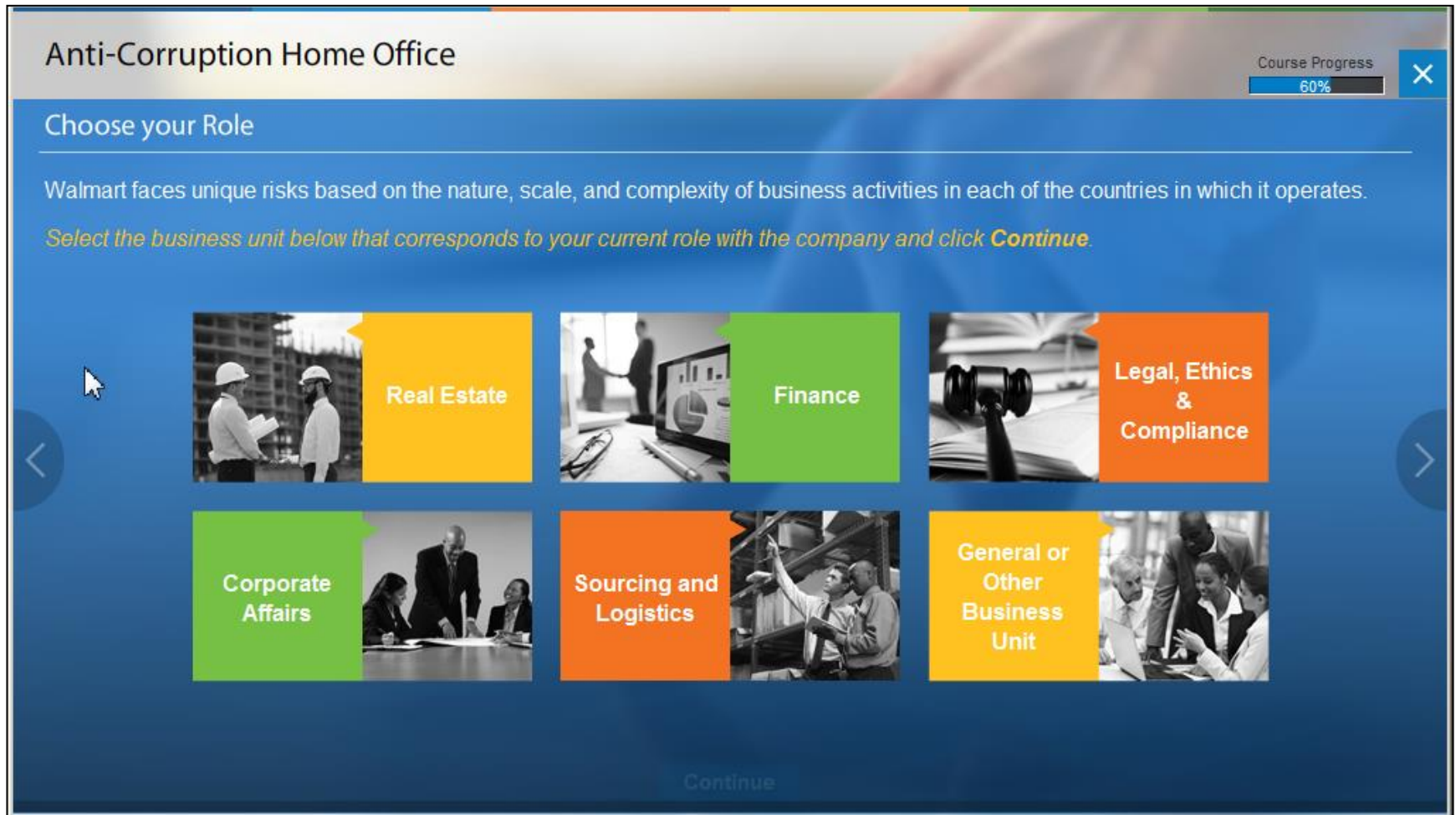
Legal, Ethics & Compliance

Corporate Affairs

Sourcing and Logistics

General or Other Business Unit

Continue



China



我们从不捐赠



现金



向个人捐赠任何东西



礼品卡
及现金等价物



向政府实体
捐款



烟或酒



任何政治组织



Argentina

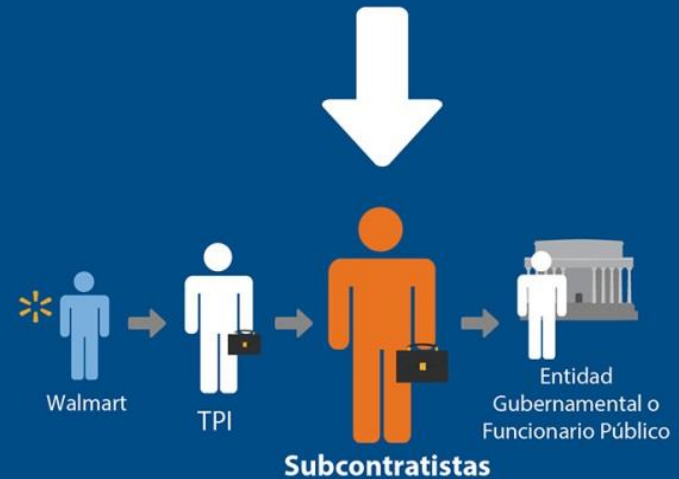
Anticorrupción:

¿Querés contratar un nuevo

Ter
con

Mirá

¿Los TPI con los que trabajás, **están usando Subcontratistas?**



Si encontrás que uno de tus TPI está usando un Subcontratista que va a representar a Walmart frente a Funcionarios Públicos, por favor **comunicate** con Anticorrupción.



walmartethics.com



1-800-WM-ETHIC



Training Completion

The diagram consists of four horizontal panels, each representing a step in the training process:

- Panel 1:** Shows a hammer icon on the left and a hammer with a nail on the right.
- Panel 2:** Shows a trowel icon on the left and a trowel applying mortar to a brick on the right.
- Panel 3:** Shows a sign on a stand labeled "Anti-Corruption Training" on the left and a starburst icon on the right.
- Panel 4:** Shows the text "Use the right tool for the job." on the left and "Complete your anti-corruption training!" on the right.

At the bottom of the diagram, the logo for International Ethics & Compliance is displayed, featuring a starburst icon and the text "International Ethics & Compliance".





H U L A

"Back in 1984, people outside the Company began to realize just how different we folks at Wal-Mart are. That was the year I lost a bet to David Glass and had to pay up by wearing a grass skirt and doing the hula on Wall Street. I thought I would slip down there and dance, and David would videotape it so he could prove to everyone back at the Saturday Morning Meeting that I really did it, but when we got there, it turned out David had hired a truckload of real hula dancers and ukulele players — and he had alerted the newspapers and TV networks. We had all kinds of trouble with the people about permits, and the dancers' union wouldn't let them dance without heaters because it was so cold, and we finally had to get permission from the head of Merrill Lynch to dance on his steps."

"Eventually, though, I slipped on the grass skirt and the Hawaiian shirt and the leis over my suit and did what I think was a pretty fair hula. It was too good a picture to pass up, I guess — this crazy chairman of the board from Arkansas in this silly costume — and it ran everywhere. It was one of the few times one of our Company stunts really embarrassed me. But at Wal-Mart, when you make a bet like I did — that we couldn't possibly produce a pretax profit of more than eight percent — you always pay up."

— From "Sam Walton: Made In America" (Doubleday)

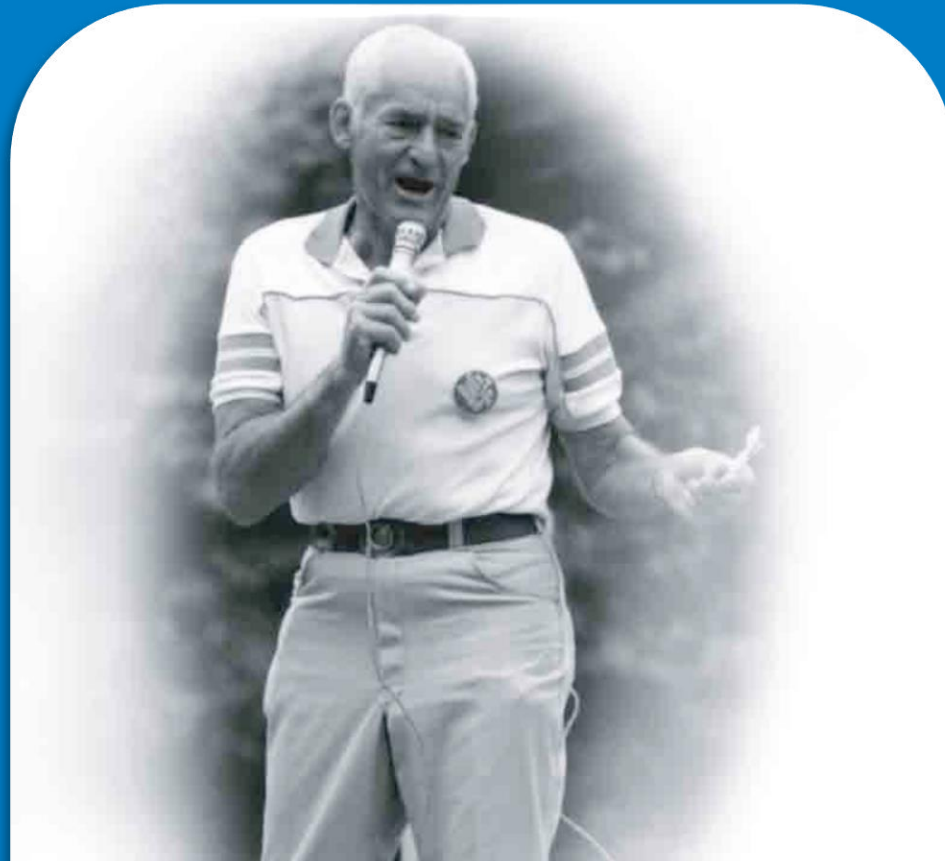


The Walmart Cheer



The Walmart Cheer





"There's absolutely no limit to what plain ordinary working people can accomplish, if they're given the opportunity, encouragement and incentive to do their best."

Sam M. Walton





4th Annual

CORPORATE LEARNING WEEK

1. Don't get lost in translation – translation vs. localization and sending the right message
2. Know your audience – the right associate, gets the right training, at the right time
3. Share your story – training and awareness campaigns with the right impact