"communicate in a respectful and professional manner," and warned (b) (6), (b) (7)(C) to show respect for (b) (6), (b) coworkers. [Tab 7.] Despite this, (b) (6), (b) (7)(C) continued to yell and say disrespectful things to coworkers. On (b) (6), (b) (7)(C), 2013, (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) again instructed (b) (6), (b) (7)(C) to stop yelling at coworkers. They warned (b) (6), (b) (7 that management would hold (b) (6), (b accountable if (b) (6), (b could not keep (b) (6), (b) temper in check.

E. (b) (6), (b) (7)(C) Received (b) (6), (b) (7 First Coaching For A Loud, Physically-Threatening Tirade Directed At Another Associate.

Despite prior oral and written warnings, (b) (6), (b) (7)(C) continued to threaten other associates. On (b) (6), (b) (7)(C), 2013, (b) (6), (b) (7)(C) confronted the (b) (6), (b) (7)(C), on the sales floor in front of customers and other associates. (b) (6), (b) (7)(C) got within an inch of (b) (6), (b) (7)(C) pointed (b) (6), (b) finger in (b) (6), (b) (7)(C) face, and screamed. (b) (6), (b) (7)(C) did not yell back or respond. (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) separated (b) (6), (b) (7)(C) from (b) (6), (b) (7)(C).

As a result, Walmart gave (b) (6), (b) (7)(C) a First Written coaching for "Respect for the Individual." [Tab 8.] During the coaching, (b) (6), (b) (7)(C) screamed at (b) (6), (b) (7)(C)(b) (6), (b) (7)(C), and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) so loudly that associates heard (b) (6), (b in the personnel office two rooms away. Management explained to (b) (6), (b) (7)(C) that the way (b) (6), (b) treated other associates hurt morale and undermined Walmart's ability to provide a peaceful working and shopping environment. (b) (6), (b) (7)(C) disagreed and stated that all of the associates loved (b) (6), (b. In response, (b) (6), (b) (7)(C) simply suggested that (b) (6), (b ask other associates how they felt about (b) (6), (b yelling. (b) (6), (b) (7)(C) did not tell (b) (6), (b) (7)(C) that no one liked (b) (6), (b). Further, (b) (6), (b) (7)(C) only asked (b) (6), (b) (7)(C) why (b) (6), (b) hated (b) (6), (b) job in response to (b) (6), (b) (7)(C) statement that management made (b) (6), (b) hate (b) (6), (b) job.

F. Walmart Issued (b) (6), (b) (7)(C) A Second Coaching For Violating The Attendance Policy.

Walmart uses a "no fault" Attendance/Punctuality Policy. [Tab 9.] In that Policy, Walmart tells associates that "to provide extraordinary customer service, we must have appropriate staffing in all areas at all times." Consequently, "regular and punctual attendance is a required and essential function of each associate's job, [and attendance violations] will be subject to disciplinary action, up to and including termination." Under the Attendance Policy, Walmart may issue a written coaching if the associate misses a scheduled shift and fails to report the absence by calling the Associate Information Line. [*Id.*]

Walmart also requires its Department Managers to work varying schedules. [Tab 1 at 2.] For example, store management requires each of the four Department Managers in the (b) (6), (b) (7)(C) to work one day each weekend during busy times, such as holiday weekends and inventory checks. Accordingly, (b) (6), (b) (7)(C) Scheduling Availability Form indicated that (b) (6), (b) could work both Saturdays and Sundays. [Tab 10.] In fact, in 2012, (b) (6), (b) (7)(C) worked scheduled Saturdays on November 17, December 15, and December 22. (b) (6), (b) (7) worked a scheduled Sunday on June 10, 2012. [Tabs 11 (schedule report) and 12 (time clock archive report).] In 2013, (b) (6), (b) (7)(C) worked scheduled Saturdays on May 25, November 16, December 7, December 14, and December 21. (b) (6), (b) (7)(C) worked a scheduled Sunday on November 24, 2013. [*Id.*] (b) (6), (b) (7)(C) allegations that management never required (b) (6), (b) to work Sundays and that (b) (6), (b had volunteered to work only one Sunday in (b) (6), (b) (b) (6), (b years at Walmart are simply false.

(b) (6), (b) (7)(C) allegation that management changed (b) (6), (b) work schedule without (b) (6), knowledge to include Sunday, (b) (6), (b) (7)(C), 2013 is also false. (b) (6), (b) (7)(C) met with (b) (6), (b) (7)(C) in person, in the (b) (6), (b) (7)(C) administrative office to change (b) (6), (b) (7) schedule to require (b) (6), (b) to work that day. At that time, (b) (6), (b) (7)(C) entered (b) (6), (b) personal passcode into the computer to allow and acknowledge the change to (b) (6), (b) schedule. Yet (b) (6), (b) (7)(C) then failed to show up for work or call the Associate Information Line to report (b) (6), (b) absence. [Tabs 11 and 12.] As a result, Walmart issued (b) (6), (b) (7)(C) a Second Written coaching on (b) (6), (b) (7)(C), in accordance with the Attendance Policy. [Tab 13.]

G. (b) (6), (b) (7)(C) Received (b) (6), (b) Third Coaching For Failing To Follow Instructions And Creating A Hostile Situation At The Store.

(b) (6), (b) (7)(C) duties included restocking store shelves with inventory from the store's warehouse. [Tab 1.] To do this, (b) (6), (b) identified the items that needed restocking, used a computer to select inventory from the warehouse (called "picks"), and then "filled" the picks by moving the items to the shelves. To prevent (b) (6), from creating more picks than (b) (6), (b) could fill during a shift, Walmart limited (b) (6), (b) to 25 picks at a time. Once (b) (6), finished filling 25 picks, (b) (6), (b) could create and fill an additional 25. Although Store 2605 applied this rule to all Department Managers, and (b) (6), (b) (7)(C) supervisors explained it to (b) (6), (b) many times, (b) (6), (b) (7)(C) repeatedly and egregiously violated it. When (b) (6), (b) did, (b) (6), (b) (7)(C) would fail to fill all of (b) (6), (b) picks, and associates on the next shift needed to finish (b) (6), (b) work.

On (b) (6), (b) (7)(C), 2014, (b) (6), (b) (7)(C) violated the rule by creating 125 picks at one time – five times the limit. An associate in the inventory management department (b) (6), (b) (7)(C), brought this to the attention of (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) overheard (b) (6), (b) (7)(C) conversation with (b) (6), (b) (7)(C), and immediately confronted (b) (6), (b) (7)(C) by yelling at (b) (6), (b) in front of other associates that (b) (6), (b) should mind (b) (6), own business and by pointing (b) (6), (b) finger in (b) (6), face. (b) (6), (b) (7)(C) did not yell back or respond. [Tab 14.] In response, Walmart issued (b) (6), (b) (7)(C) a Third Written coaching on (b) (6), (b) (7)(C) for Poor Business Judgment, Job Performance, and Respect for the Individual. [Tab 15.] During (b) (6), coaching, (b) (6), (b) (7)(C) screamed at (b) (6), superiors loud enough that associates in the training room heard (b) (6), (b) (6), (b) also failed to recognize that (b) (6), (b) loud and intimidating behavior was inappropriate for the workplace, and (b) (6), declared that (b) (6), (b) would not change a thing about what (b) (6), had said to (b) (6), (b) (7)(C). [Tab 16.] Management warned (b) (6), (b) (7)(C) that (b) (6), (b) next coachable offense would result in (b) (6), (b) (7 discharge. [Tab 17.]

H. Shortly After (b) (6), (b) Third Coaching, (b) (6), (b) (7)(C) Again Engaged In A Threatening Outburst Directed At (b) (6), (b) (7 Superiors.

On (b) (6), (b) (7)(C), 2014, (b) (6), (b) (7)(C) approached (b) (6), (b) (7)(C) to complain that overnight associates had placed merchandise in the wrong location when restocking shelves. (b) (6), (b) (7)(C) responded that (b) (6), (b) would address the problem. Despite (b) (6), (b) (7)(C) assurance, (b) (6), (b) (7)(C) barged into the (b) (6), (b) (7)(C) office to make the same complaint to (b) (6), (b) (7)(C) (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), who overheard (b) (6), (b) (7)(C), asked if (b) (6), could help because (b) (6), (b) worked the overnight shift. (b) (6), (b) (7)(C) snapped that (b) (6), (b) was not talking to (b) (6), (b) (7)(C) but to (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) then moved very close to (b) (6), (b) (7)(C), pointed (b) (6), (b) finger in (b) (6), (b) (7)(C) face in a threatening manner, and yelled that (b) (6), (b) (7)(C) did not do (b) (6), (b) job. (b) (6), (b) (7)(C) yelled so loudly that associates in the break room nearby heard (b) (6), (b). When (b) (6), (b) (7)(C) tried to respond, (b) (6), (b) (7)(C) held (b) (6), (b) (7

hand up in (b) (6), (b) (7)(C) face to signal that (b) (6), (b) was not through talking. (b) (6), (b) (7)(C) certainly never told (b) (6), (b) (7)(C) that (b) (6), (b) complained too much. At that point (b) (6), (b) (7)(C) instructed (b) (6), (b) (7)(C) to leave the office, and (b) (6), (b) (7)(C) stormed out. [Tab 18.] On (b) (6), (b) (7)(C), Walmart terminated (b) (6), (b) (7)(C) for Misconduct With Coachings because of (b) (6), (b) behavior on April 16. [Tabs 19 and 20.] Walmart classified (b) (6), (b) (7)(C) as eligible for rehire. [Tab 19.]

I. Walmart Disciplined And Discharged Similarly-Situated Associates.

From (b) (6), (b) (7)(C), 2012 to (b) (6), (b) (7)(C), 2014, the Gallipolis Store gave at least 4 coachings for threatening and intimidating outbursts towards coworkers, 8 coachings for failure to follow procedures or instructions, and 267 coachings for violation of the Attendance Policy, including 26 for no call/no show. [Tabs 21-23.] During the same time period, the store discharged 7 associates for Misconduct With Coachings because, like (b) (6), (b) (7)(C), they had reached the last level of Walmart's progressive disciplinary process. [Tab 24.]

J. Walmart Promptly Addressed (b) (6), (b) (7)(C)'s Safety Concerns.

Walmart keeps inventory in a warehouse at the back of the store on shelves called "bins." According to Walmart rules, the top of the box on the highest bin should not exceed 14 feet from the ground. Sometimes, Inventory Management System ("IMS") associates stack the boxes too high. Generally, IMS supervisors catch this error and fix it immediately. On occasion, (b) (6), (b) (7)(C) complained to (b) (6), (b) superiors about the height of boxes before IMS supervisors had remedied the problem and, on those occasions, (b) (6), (b) (7)(C) superiors fixed it immediately. (b) (6), (b) (7)(C) never instructed (b) (6), (b) (7)(C) to "squash" any safety concerns (b) (6), (b) had.

To be sure, Walmart encourages associates to report safety issues, and instructs all managers to address safety concerns promptly. In fact, as (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) did not need to wait for anyone to remedy over-stacked boxes because associates in her department, such as (b) (6), (b) (7)(C), were trained on the power equipment used to restack boxes, and (b) (6), (b) (7)(C) simply could have directed one of them to fix the problem.

II. LEGAL ANALYSIS.

A. (b) (6), (b) (7)(C) Charge Fails Because (b) (6), (b) (7)(C) Qualifies As A Section 2(11) Supervisor.

As a (b) (6), (b) (7)(C), (b) (6), (b) (7)(C) qualifies as a "supervisor" under Section 2(11) of the Act and falls outside the Act's definition of protected "employees." 29 U.S.C. § 152(3). Section 2(11) defines a "supervisor" as any person "having authority in the interest of the employer, to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or responsibly to direct them, or to adjust their grievances, or effectively to recommend such action, if…such authority is not of a merely routine or clerical nature, but requires the use of independent judgment." The Supreme Court has explained that an employee attains supervisory status if she exercises authority in any one of the 12 enumerated areas. *NLRB v. Yashiva Univ.*, 444 U.S. 672, 682 n.13 (1980).

(b) (6), (b) (7)(C) meets this definition. (b) (6), (b) (7)(C) possessed the authority to train associates, assign and direct their work, instruct them when to take their breaks, and orally discipline them. (b) (6), (b) (7)(C) in fact exercised that authority. *See KBI Security Servs.*, 318 NLRB 268, 268 (1995) (training and

orally disciplining security guards sufficient for supervisory status); *Laser Tool, Inc.*, 320 NLRB 105, 108 (1995) (training and assigning work to tool grinders confers supervisory status). (b) (6), (b) (7)(C) also conducted first-level screening interviews (*see* p. 2). *See Times-Herald, Inc.*, 253 NLRB 524, 527 (1980) (employee fell within the definition of "supervisor" because he interviewed and screened job applicants, even though he did not possess the ultimate authority to hire). As a supervisor, (b) (6), (b) (7)(C) does not enjoy the rights of "employees" under Section 7, and Walmart simply could not violate those rights here.

B. The Act Bars (b) (6), (b) (7)(C) Challenge To (b) (6), (b) (7) First And Second Coachings As Untimely.

Section 10(b) of the Act provides that "no complaint shall issue based upon any unfair labor practice occurring more than six months prior to the filing of the charge with the Board and the service of a copy thereof upon the person against whom such charge is made." 29 U.S.C. §160(b). Because the First and Second Written coachings occurred more than six months before the filing of the Charge, (b) (6), (b) (7)(C) claims with regard to those two coachings are time-barred.

C. (b) (6), (b) (7)(C) Retaliation Allegation Fails Because (b) (6), (b) (7)(C) Cannot Establish A *Prima Facie* Case Under *Wright Line*.

The Board's traditional *Wright Line* analysis applies to (b) (6), (b) (7)(C) claim that Walmart retaliated against (b) (6), (b. Under the *Wright Line* framework, (b) (6), (b) (7)(C) initial burden requires a showing that "(1) the employee was engaged in protected activity, (2) the employer had knowledge of the protected activity, and (3) the employer bore animus toward the employee's protected activity." *LM Waste Serv. Corp.*, 357 NLRB No. 194, *1 (2011).

(b) (6), (b) (7)(C) cannot demonstrate that Walmart bore any animus toward (b) (6), (b) in coaching or discharging (b) (6), (b) and no animus in fact existed. First, at no time during any discussion with (b) (6), (b) (7)(C) about (b) (6), (b) misconduct did management mention (b) (6), (b) (7)(C) safety complaints. *See Volt Info. Sciences*, 274 NLRB 308, 318-19 (1985) (animus not shown where no discussion of employee's protected activities occurred when supervisor took employment actions). Second, Walmart management promptly addressed any safety concerns (b) (6), (b) (7)(C) raised. Third, Walmart coached and discharged associates who engaged in similar misconduct. *See Snap-On-Tools, Inc.*, 342 NLRB 5, 7 (no animus absent evidence that employer treated similarly-situated employees more favorably). Fourth, Walmart's designation of (b) (6), (b) (7)(C) as eligible for rehire weighs against a finding of animus. *See Sam's Club*, 349 NLRB 1007, 1025 (2007) (employer unlikely to possess unlawful, anti-union intent when it recommends for rehire a cashier it discharged).

D. Walmart Coached And Discharged (b) (6), (b) (7)(C) For Legitimate, Non-Discriminatory Reasons, And (b) (6), (b) (7)(C) Cannot Show Pretext.

Even if (b) (6), (b) (7)(C) could make a *prima facie* case of discrimination, Walmart possessed a legitimate reason for coaching and discharging (b) (6), (b), treated (b) (6), (b) with restraint and in accordance with its progressive discipline policy after numerous reminders and coachings, and would take the same action in response to (b) (6), (b) misconduct absent any purportedly protected activity. *See Wright Line*, 251 NLRB 1083, 1088 (employer can overcome *prima facie* case by demonstrating it possessed a legitimate business reason and would take the same action even in the absence of protected activity).

The Board consistently holds that an employer may discipline and discharge employees who harass and threaten coworkers, engage in insubordinate behavior, and violate company policies. *See, e.g.*, *Waste Mgmt. of Ariz.,* 345 NLRB 1339, 1340-41 (2005) (employer legally discharged employee for screaming at manager); *Holy Cross Hospital,* 319 NLRB 1361, 1367-68 (1995) (employer legally disciplined employee for yelling at a coworker); *State Equipment, Inc.,* 322 NLRB 631, 648-50 (1996) (employer did not violate the Act by discharging an employee for screaming at a supervisor "at the top of his lungs"); *Nat'l Sec. Technologies, LLC*, 356 NLRB No. 183, at *1, *6, *15 (2011) (employer lawfully took employment action against union supporter who had a history of creating a hostile work environment and harassing fellow employees); *Bridgestone Firestone S. Carolina*, 350 NLRB 526, 530 (2007) (employer lawfully disciplined employee for using "profane language in a threatening tirade" toward coworkers and would have done so absent protected conduct); *Continental Auto Parts,* 357 NLRB No. 78, *5 (2011) (employer lawfully discharged employee for failure to follow employer instructions); *Mesker Door, Inc.,* 357 NLRB No. 59, *60-61 (2011) (employer lawfully discharged employee for failure to follow supervisor's instruction to inspect every 20th door); *Allied Mech. Servs.,* 346 NLRB 326, 327-28 (2006) (employee's frequent absences constituted a legitimate business reason to discharge employee); *Neptco, Inc.*, 346 NLRB 18, 18, 27-31 (2005) (employer lawfully discharged employee for work performance and violating attendance policy).

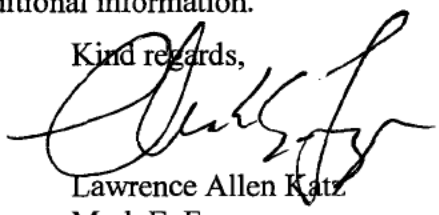
The Board also holds that an employer may discharge employees who reach the last step in the employer's disciplinary system. *See Beverly Health & Rehab. Servs., Inc.*, 346 NLRB 1319, 1324-25 (2006) (employer lawfully discharged employee "in accordance with its progressive disciplinary policy").

Finally, (b) (6), (b) (7)(C) cannot show that Walmart's legitimate business reasons constitute a pretext for unlawful retaliation. *See Jordan Marsh Stores Corp.*, 317 NLRB 460, 476 (1995) (employee must demonstrate the employer's reason amounted to mere pretext). Specifically, (b) (6), (b) (7)(C) cannot show any reason to disbelieve Walmart's well-supported reasons for disciplining and discharging (b) (6), (b) *See Keco Indus., Inc.*, 271 NLRB 634, 637 (1984) (no inference of discriminatory motive where no evidence exists that the employer treated the charging party differently from other similarly-situated employees); *Praxair Distrib., Inc.*, 357 NLRB No. 91, at *22 (2011) (no evidence of pretext when employer provided substantial evidence that it consistently and uniformly applied its disciplinary policy). In short, (b) (6), (b) (7)(C) cannot establish a retaliation claim under Section 8(a)(1).

III. CONCLUSION.

For the foregoing reasons, Walmart did not violate the Act as alleged, and the Company respectfully requests that the Region dismiss the Charge absent withdrawal. Please contact us with any questions or if you require additional information.[1]

Kind regards,



Lawrence Allen Katz
Mark E. Freeze

[1] As requested, Walmart provides (b) (6), (b) (7)(C) personnel file at Tab 25. Walmart submits the information in this letter for the sole purpose of resolving (b) (6), (b) (7)(C) Charge. Walmart reserves all rights and defenses (including procedural and *Noel Canning* issues) that it now possesses or may later possess concerning the Charge or related issues. Walmart requests that the NLRB keep all information related to (b) (6), (b) (7)(C) Charge confidential to the fullest extent permitted by law.

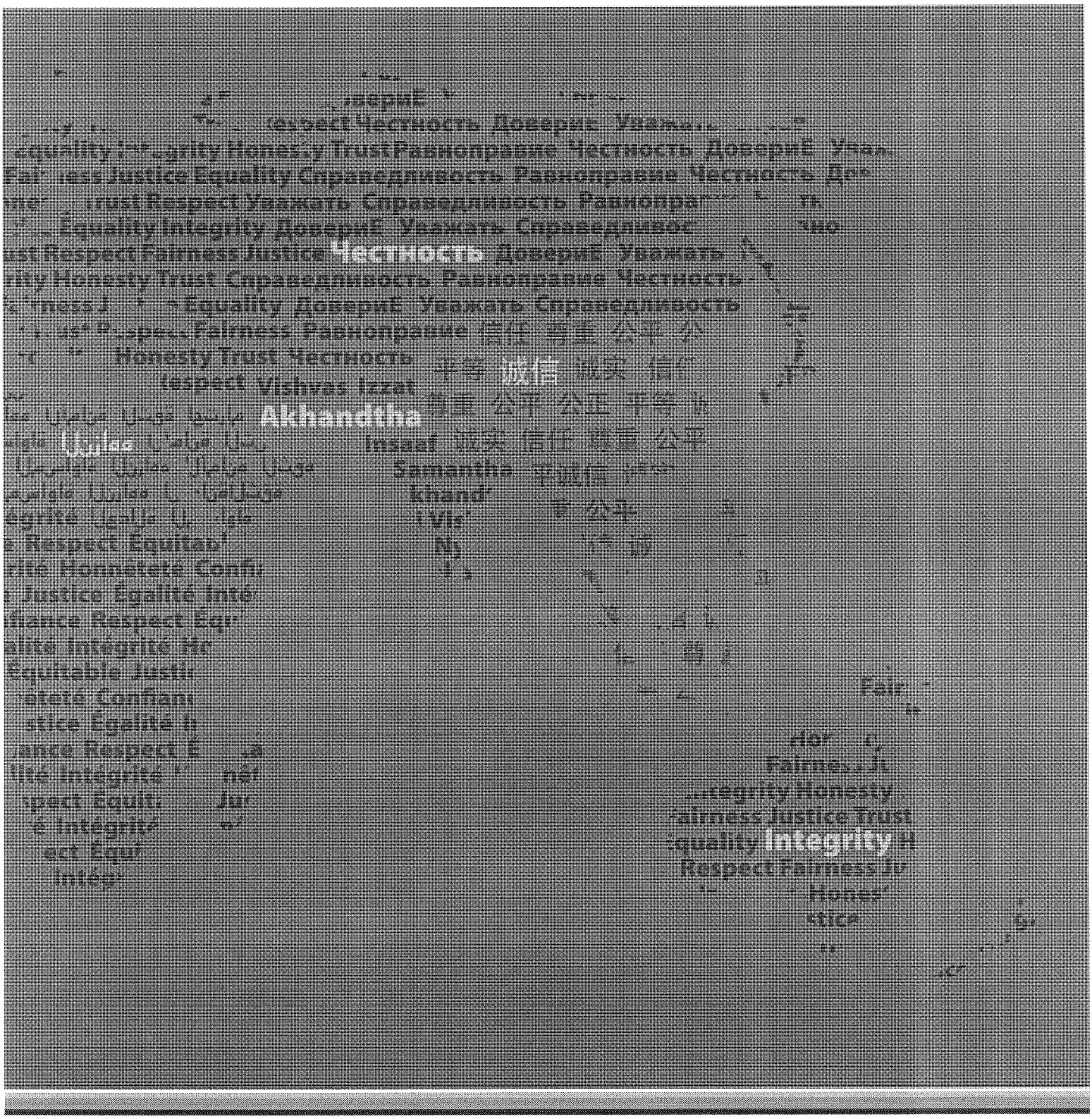
TAB 1

ATTACHMENT/EXHIBIT TO POSITION STATEMENT WITHHELD PURSUANT TO EXEMPTIONS 6 and 7(C)

TAB 2

	A	B	C	D	E	F
1	APPLICANT_FIRST	INTERVIEWER_FIRST	INTERVIEWER_LAST	RATINGS_SAVED_TIME	INTERVIEW_STATUS	INTERVIEW_TYPE
2	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) 2013 08:46	Event Completed	Hourly Supervisor Interview
3	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:20	Event Completed	Hourly Supervisor Interview
4	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:24	Event Completed	Hourly Supervisor Interview
5	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:26	Event Completed	Hourly Supervisor Interview
6	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:22	Event Completed	Hourly Supervisor Interview
7	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:37	Event Completed	Hourly Supervisor Interview
8	[redacted]	[redacted]	[redacted]	[redacted] 2013 08:57	Event Completed	Hourly Supervisor Interview
9	[redacted]	[redacted]	[redacted]	[redacted] 2013 08:55	Event Completed	Hourly Supervisor Interview
10	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:45	Event Completed	Hourly Supervisor Interview
11	[redacted]	[redacted]	[redacted]	[redacted] 2013 09:07	Event Completed	Hourly Supervisor Interview
12	[redacted]	[redacted]	[redacted]	[redacted] 2013 10:24	Event Completed	Hourly Supervisor Interview

TAB 3



Walmart Statement of Ethics

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A message from our Chief Executive Officer

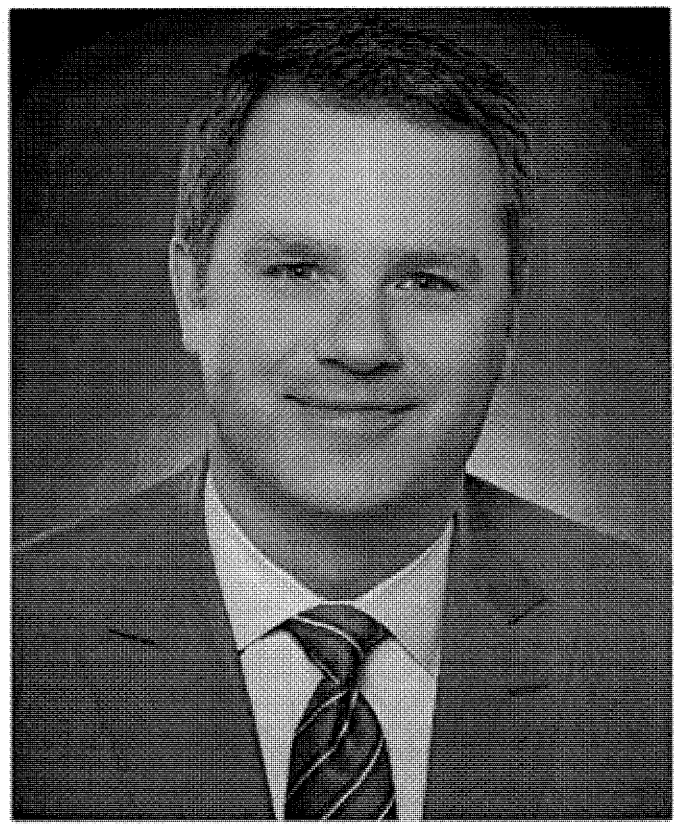
Doug McMillon, CEO

Our unique culture drives our purpose of saving people money so they can live better, and the foundation of that culture is our commitment to operating with integrity. Even as we change to meet the needs of our customers, Walmart will stay true to the values, beliefs and behaviors that have guided us for the last 50 years.

Regardless of where you are in our global company, this Statement of Ethics is your guide to exemplifying integrity as a Walmart associate. It's a daily resource for helping you make honest, fair and objective decisions while operating in compliance with all laws and our policies.

Through your ethical behavior and willingness to speak up for the highest standards, we earn and keep the trust of our customers, each other and our local communities. We believe in everyday low cost and everyday low prices, but only if accomplished through your everyday integrity.

Thank you for your commitment to our Statement of Ethics. It means more than making ethical decisions; it demonstrates you care about Walmart, our reputation and our customers.



Doug McMillon

Doug McMillon
President and CEO
Wal-Mart Stores, Inc.

Using the Statement of Ethics

This Statement of Ethics is going to introduce you to the types of attitudes and conduct that create an honest, fair, and legal workplace. You're going to learn how to recognize situations that might come up on your job that could be a violation of our company ethics. Plus, you'll learn what to do if you have any questions or concerns about what is correct and ethical conduct. Our 3 Basic Beliefs and Guiding Principles at the beginning of this Statement of Ethics will give you a general idea of correct company ethics. But, remember no guide or manual can give you a complete set of rules. So, in the end, we all must trust our own good judgment of right and wrong.

How the Statement of Ethics is organized

- Inside the front cover is a letter from Doug McMillon, our president and CEO of Walmart. He points out how important it is for all of us to follow our Statement of Ethics, and how important it is to report anything we feel might be a violation of those ethics.
- On the next page are our Guiding Principles. These are a good starting point as a set of guidelines for ethical behavior.
- The Introduction section explains that it's your responsibility to comply with our Statement of Ethics and to report what you feel might be any violation of policy or law.
- The section Raising Concerns & Speaking Up tells you how to request an opinion before you take action and how to report what you think might be a violation of ethics, including a way to make a report in private and without giving your name.
- This guide gives you an overview of many policies. Some commonly asked questions are included to help explain each policy better. There are also examples of how this Statement of Ethics and other Walmart policies apply in all countries.

Global policies and local laws

Each business organization Walmart operates is expected to have a complete set of policies providing guidance to associates for whatever country they are working in. Walmart also publishes several "global policies," which are designed to give associates a set of rules that are the same for all locations. This Statement of Ethics is an example of a global policy.

If any part of this Statement of Ethics goes against local policies or laws, then the local policy or law must always be followed. It's our responsibility to know all of the local laws and policies that might affect our area of business. If you're not sure about any local laws or policies, please talk to your manager, the Walmart in-country Legal Department, or the Global Ethics Office.

Some local laws, practices, or even local customs could be more relaxed than our Statement of Ethics. If you find yourself in this kind of situation, you should always rely on our Statement of Ethics.

Our 3 Basic Beliefs

Since Sam Walton founded Walmart, it has always been a values-based, ethically led company. The values that guide our decisions and our leadership are the 3 Basic Beliefs:

Respect for the individual

Service to our customers

Striving for excellence

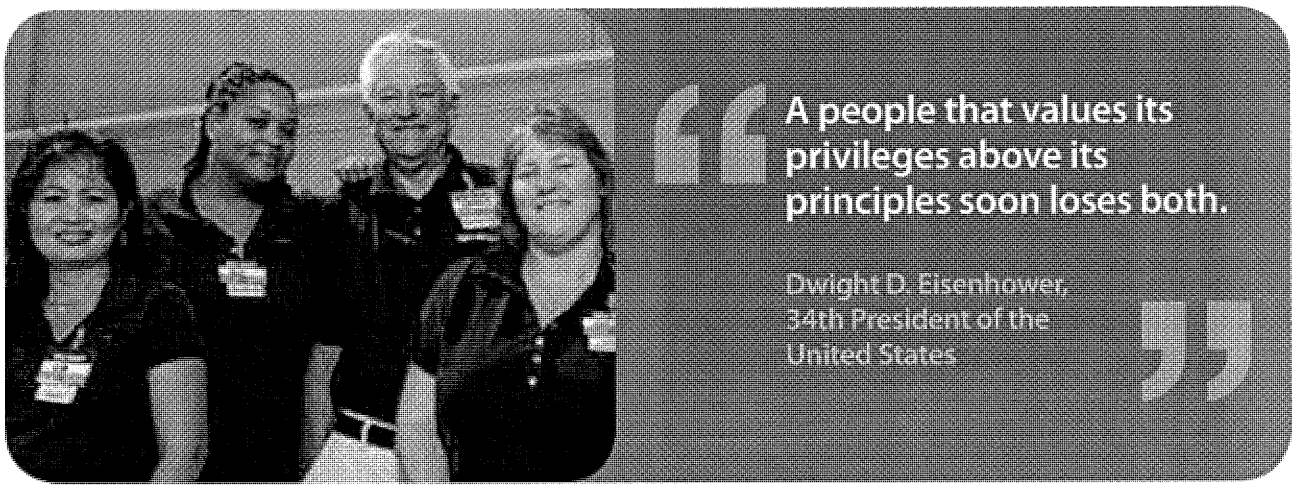
Vision statement

The vision of the Global Ethics Office is to promote ownership of Walmart's ethical culture to all stakeholders globally.

Guiding principles

These principles are meant to help our associates make the right decisions, and to act with integrity.

- Always act with integrity.
- Lead with integrity, and expect others to work with integrity.
- Follow the law at all times.
- Be honest and fair.
- Reveal and report all information truthfully, without manipulation or misrepresentation.
- Work, actions, and relationships outside of your position with the company should be free of any conflicts of interest (discussed later in this guide).
- Respect and encourage diversity, and never discriminate against anyone.
- Ask your manager or the Global Ethics Office for help if you have questions about this Statement of Ethics, or if you face an ethical problem.
- Promptly report suspected violations of the Statement of Ethics.
- Cooperate with and maintain the private nature of any investigation of a possible ethics violation.
- When involved in an ethics investigation, you should reveal and report all information truthfully. You should present all the facts you are aware of without personal opinion, bias, or judgment.



Who's covered by the Statement of Ethics?

Associates and Directors

This Statement of Ethics applies to all associates worldwide, and all members of the board of directors of Wal-Mart Stores, Inc. It also applies to the associates and directors of all Walmart–controlled subsidiaries.

Third Parties

Walmart expects its suppliers, consultants, law firms, public relations firms, contractors, and other service providers to act ethically and in a manner consistent with this Statement of Ethics. If you hire a service provider, you should take reasonable steps to make sure the service provider is aware of our Statement of Ethics, has a reputation for integrity, and acts in a responsible manner consistent with our standards.

What law applies

Walmart conducts business in many countries around the world. Our associates are citizens of many countries and, as a result, our operations are subject to many different laws, customs, and cultures.

The number of laws and regulations around the world that affect Walmart increase and become more complex each year. When it's possible, this Statement of Ethics will be modified to conform to changes in laws and customs. In some instances, the laws of two or more countries will conflict. When you encounter a conflict, contact the Global Ethics Office or your in-country Ethics Committee to understand how to resolve the conflict.

Associate responsibilities

The following basic obligations apply to all associates:

- Follow the law at all times. If you see any associate violating the law, or if you're asked to do something you believe may violate the law, discuss it immediately with your manager, in-country Ethics Committee, or the Global Ethics Office.
- Read and understand the Guiding Principles and use those principles in your job every day.
- Learn the policies that apply to your job. No one expects you to memorize every policy, but it's good to have a basic understanding of issues covered by each policy.

- Ask for help from your manager, the Global Ethics Office, or other Walmart resources when you have questions about the application of this Statement of Ethics or other policies.

- Immediately raise any concern you, or others, may have about possible requests or acts that may be a violation of this Statement of Ethics or any Walmart policy.

- It's important to understand how to raise ethics concerns. You can raise them with a manager, or by contacting the Global Ethics Office directly. Ways to raise concerns are described in more detail later in this guide. If you raise an ethics concern through a manager and the issue is not resolved, raise it through a different manager or the Global Ethics Office directly.

- Cooperate with and maintain the privacy of any Walmart investigation into violations of this Statement of Ethics, or any other Walmart policy.

Additional responsibilities for management

As a management associate, you're responsible for creating an environment that encourages compliance with Walmart Statement of Ethics. Supervision of responsible business practices is as important as supervision of performance. You should do the following to make sure our company maintains the highest ethics:

- When an ethics issue comes to your attention, contact the Global Ethics Office for assistance.

- Meet with your direct reports as a group periodically to review the Guiding Principles and this Statement of Ethics.

- Where there is a conflict between our ethics and business objectives, our ethics must always come first.

- Lead by example, and encourage your associates to act with integrity in all dealings to avoid even the appearance of a violation of our business standards.

- If an ethics issue arises with one of your associates, make sure other associates in your area are not making the same mistake.

- Ensure open communication by encouraging associates in your department or division to ask questions concerning our Statement of Ethics.

- Never cover up or ignore any ethical conduct problem. Address the matter in a timely manner and seek guidance if necessary.

- Appreciate associates who raise issues.

- Never retaliate against anyone for raising an ethics issue, assisting in an investigation, or participating in any proceeding relating to an alleged violation of any applicable government regulations, laws or rules, or an alleged fraud against shareholders.

- Encourage self-reporting of business conduct violations. If an associate voluntarily reports that they were involved in an ethics violation, such self-reporting may be considered when determining the appropriate disciplinary action to be taken.

Discipline for violations

Appropriate disciplinary action, up to and including termination, may be taken against any associate whose conduct violates this Statement of Ethics or applicable laws and regulations, including the Guiding Principles.

"Don't compromise your reputation. It's a precious commodity. Don't compromise your integrity ... have a good name."

Sam Walton

Raising concerns and speaking up

All of us should constantly work to maintain a working environment that encourages associates to raise concerns about possible violations of our Statement of Ethics. Often we hear stories of other companies where employees were aware of problems, but did not feel comfortable coming forward. No one should feel that way at Walmart. Please report possible ethics problems immediately so they can be resolved before more serious consequences develop.

Ethics opinions

In the normal course of business, you might have a situation where you're not quite sure if there is a violation of ethics, or whether the situation is within the standards described in this Statement of Ethics. When you have any ethics question, you are encouraged to use the Open Door process or contact the Global Ethics Office for a verbal or written opinion before you take any action.

Waivers and what happens when an ethics concern is raised

Waivers

Any associate (other than executive officers) can request from the Global Ethics Office a waiver of the applicability of this Statement of Ethics. Ethics waiver requests must be submitted in writing to the Global Ethics Office by the associate, and must contain in detail all of the relevant facts and circumstances supporting the requested waiver. The Global Ethics Office will respond in writing to the associate.

For members of the board of directors and executive officers, requests for waivers of the Statement of Ethics will only be considered by the Audit Committee or by the full board of directors, as the board of directors determines. Members of the board of directors and the chief executive officer must submit their own waiver requests in writing. Written requests must set forth the relevant facts and circumstances supporting the waiver. After receipt and review of the request, the Audit Committee or the board of directors will respond in writing to the requester. Any waivers of this Statement of Ethics granted in favor of members of the board of directors or executive officers will be promptly disclosed to shareholders.

All waiver requests must be approved in advance of the conduct for which approval is sought.

What happens when an ethics concern is raised

Walmart takes all reported concerns seriously. We will confidentially investigate allegations to determine if any law, policy, or the Statement of Ethics has been violated. If you

report a violation, the Global Ethics Office will make every effort to keep your identity private. We will also work to make sure any data relating to the investigation is kept secure. To assist in privacy, it's important that you do not discuss your concern with others.

If you've raised a concern with management, they will follow up with you in a reasonable amount of time and provide an update on the issue. Specific information regarding investigations is private information, but you will be told the status of the investigation — whether it's active or closed.

How to raise a business conduct concern

Walmart provides a variety of resources you can turn to when you need to raise a question or concern. Depending on the nature of the concern, it may be easiest to talk to the person responsible directly about your concerns, providing them an opportunity to clarify their conduct. If you don't feel comfortable handling the situation yourself, or if you believe the misconduct involves a legal issue, you should consult one of the following resources:

- **Use the Open Door Communications process**
  The Open Door Communications process is the most direct way to voice any concern to a manager. If you believe your immediate manager is involved in the problem, discuss the issue with the next level of management who is not involved, or use one of the other resources described below.

- **Call the Global Ethics Office**
  Walmart has a Global Ethics Helpline, which is available to associates around the world 24 hours a day, seven days a week, and is equipped to handle most local languages. The Helpline is staffed by an organization not affiliated with Walmart, and to the extent possible (and in conformity with local regulations), callers may not have to give their name. In all cases, associate privacy will be respected to the fullest extent possible under the law. The operator will relay the information to the Global Ethics Office, and will provide the associate with a case number and callback date if desired. Global Ethics Office phone numbers are located in the back of this tool.

Q & A

If an associate reports a Statement of Ethics violation to the Global Ethics Helpline, is that associate exempt from disciplinary actions for unrelated misconduct?

Not necessarily. The report made by the associate, and the associate's own misconduct are two separate issues that should be dealt with independent of each other. We are all expected to perform our duties with integrity, respect, and are accountable for our own actions when conducting business for Walmart.

- **Call your local Ethics Committee**
  U.S.A., Puerto Rico and Canada = 1-800-WM-ETHIC [1-800-963-8442]
  Canada (French) = 1-800-805-9121
  (Specific phone numbers for all countries are listed in the back of this tool.)

- **Contact the Global Ethics Office by mail, e-mail, or on the Internet**

  Mail
  Wal-Mart Stores, Inc.
  Attn: Global Ethics Office
  702 SW 8th Street
  Bentonville, AR 72716-0860

  E-mail
  ethics@wal-mart.com

  Internet
  walmartethics.com

> You can overcome almost anything, but you cannot overcome a lack of integrity.
>
> Lee Scott

Q & A

I was asked to take a drug test before accepting a promotion into management. Is this standard?

Where permitted by law, job applicants may be drug screened as part of the post-offer hiring process, or prior to accepting a promotion into management. Any applicant who tests positive for illegal drug use will not be hired or promoted, and may be terminated. In addition, Walmart may require you to submit to drug testing following certain on-the-job injuries or if there's a reasonable basis to suspect you're under the influence of drugs (also only where permitted by law).

Is there somewhere I can go for help if I have a drug or alcohol problem?

Walmart operations in some countries provide Helpline-counseling services. Please contact your Human Resources manager or local substance-abuse counseling center for help.

I'm attending a Walmart-sponsored group/supplier meeting. Alcohol will be served. May I have alcohol while there?

With executive vice president approval, Walmart-sponsored events may provide alcohol. Associates of legal age may consume alcohol at these events as long as they do not allow it to impair their judgment.

Leading with integrity in our workplace

Alcohol & drug abuse

Walmart is committed to a safe and healthy workplace for everyone. The use of alcohol and illegal drugs can create serious safety risks in our workplace. The possession, solicitation, or use of illegal drugs, or being under the influence of such drugs on company time, while on company property, or at any Walmart-sponsored event, is prohibited and will not be tolerated. In some instances, associates may consume alcoholic beverages at company-sponsored events when appropriate monitoring is in place, off Walmart property, and with the appropriate level of approval (your in-country president, your division's executive vice president, or your in-country Ethics Committee). Walmart will take common business practices into consideration in countries where a moderate consumption of alcohol with a meal is common. All associates should ensure their performance and judgment are unimpaired by alcohol consumption during working hours.

Harassment

We believe in treating each other with respect, whether it's a co-worker, supplier, customer, or anyone doing business with us.

Harassment:
Any conduct which inappropriately or unreasonably interferes with work performance, diminishes the dignity of any person, or creates an intimidating, hostile, or otherwise offensive work environment.

Verbal, visual, or physical conduct of a sexual nature is not acceptable in the workplace and may be determined to be sexual harassment. Examples include:

- Sexual advances, requests for sexual favors, sexually explicit language, off-color jokes, remarks about a person's body or sexual activities.
- Displaying sexually suggestive pictures or objects, suggestive looks or leering, or suggestive communication in any form.
- Inappropriate touching, both welcome and unwelcome.

Inappropriate conduct

We believe in maintaining a working environment free of violence or threats of violence. This means inappropriate language, gestures, threats of violence, and physical violence will not be tolerated. This kind of behavior creates hostile working conditions, and violates the first of the 3 Basic Beliefs: respect for the individual.

Q&A

A department manager comments regularly about my body. What should I do?

We encourage you to first tell the person to stop. If you're not comfortable with this, or the activity does not stop, contact your manager through the Open Door process, your Human Resources manager, or the Global Ethics Office immediately.

Is my desk calendar with occasional sexual jokes appropriate in the workplace?

It could be offensive to someone else in the workplace. If you're in doubt, remove the item from the workplace.

An associate used a word in a meeting that is offensive to me. What should I do?

Speak up and tell the person. Some words are universally offensive but some are not. They might not know the word could be seen as offensive to someone. You can also exercise the Open Door process, contact someone in Human Resources, or the Global Ethics Office.

Q & A

I reported an allegation six months ago. Ever since, my manager stopped including me in several meetings. Is this retaliation?

Significant changes in how you're treated can be viewed as retaliation. If your manager treats you differently since you reported an allegation, you should raise your concern to management through the Open Door process or to the Global Ethics Office.

One of my associates called the Helpline and made a false claim against me this past year. I think they did it to hurt my career. Can I score them lower on the "Integrity" section of their evaluation since they're obviously trying to spread lies about me?

We should believe that associates who report concerns do so in good faith. Therefore, taking action against an associate for reporting a concern would be viewed as retaliation, and could result in disciplinary action for you as a manager. Retaliation will not be tolerated at Walmart. It prevents an open reporting environment, and encourages a culture of fear.

After an associate reported an ethics violation concerning their assistant manager to the Human Resources manager, their assistant manager began tracking all their mistakes. Is this retaliation?

Any variations from how the assistant manager previously treated the associate, and variations from how they treat other associates could be perceived as retaliation.

Is protection from retaliation only provided if I report my concerns through the Helpline?

Retaliation is unacceptable no matter which source you used to raise your concern (through management, Human Resources, or Global Ethics). If you believe you have been retaliated against, please contact one of those sources immediately.

Non-retaliation

Associates who come forward with concerns play an important role in maintaining a healthy, respectful, and productive workplace, as well as protecting our stakeholders. These associates help our company address problems early — before more serious consequences develop. It's important for each of us to create a working environment where everyone can raise concerns of ethics issues without fear of retaliation.

Retaliation against associates who raise concerns or questions about misconduct in "good faith" will not be tolerated. Good faith means that you have made a genuine attempt to provide honest and accurate information, even if you are later proven to have been mistaken. Walmart reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly. However, if an associate voluntarily reports that they were involved in a violation, such self-reporting may be considered when determining the appropriate disciplinary action to be taken.

Walmart will not terminate, demote, or otherwise discriminate against associates for raising concerns. Also, it is important for co-workers not to isolate associates who have raised concerns — such employees should be treated with respect. Any change in treatment toward an associate who has raised a concern could be seen as informal retaliation.

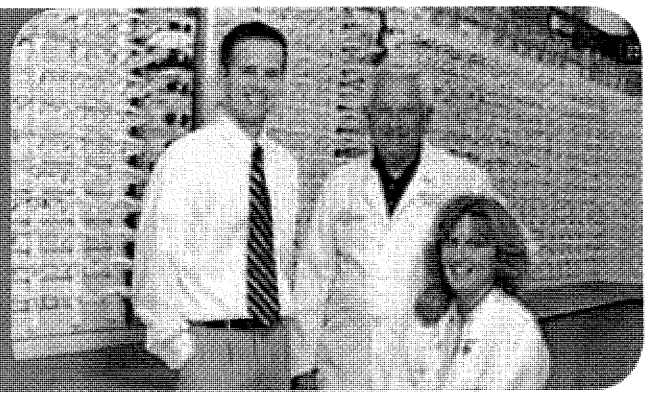
Walmart has established a process to deal with retaliation issues. Associates who believe they have experienced retaliation after raising an ethics concern should bring the issue to the attention of their manager, or to the attention of the Global Ethics Office. The helpline can also be used to discuss a retaliation issue.

Non-discrimination

The first of the three basic beliefs upon which Sam Walton founded our company is "respect for the individual." Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all of our interactions in the workplace.

We are committed to maintaining a diverse workforce and an inclusive work environment. Walmart will not tolerate discrimination in employment, employment-related decisions, or in business dealings on the basis of race, color, ancestry, age, sex, sexual orientation, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy, or

> Character is power.
>
> Booker T. Washington, American educator (1856-1915)



any other legally protected status. We should provide an environment free of discrimination to our associates, customers, members, and suppliers.

Wage and hour

We are committed to complying fully with all applicable laws and regulations dealing with wage-and-hour issues, including off-the-clock work, meal and rest breaks, overtime pay, termination pay, minimum-wage requirements, wages and hours of minors, and other subjects related to wage-and-hour practices. As Walmart associates, we must:

- Comply fully with all corporate policies and procedures related to wage-and-hour issues;
- Comply fully with all applicable federal, state, and local laws and regulations pertaining to wage-and-hour issues;
- Report any violations of wage-and-hour laws or policies to management.

It is a violation of law and Walmart policy for you to work without compensation or for a supervisor (hourly or salaried) to request that you work without compensation. You should never perform any work for Walmart without compensation.

Q & A

In the break room, another associate called me a disrespectful name associated with my nationality. What should I do?

Immediately contact your manager (through the Open Door process or contact the Global Ethics Office.

A customer continues to call me bad names while in my checkout line. What should I do?

Contact a member of management or the Asset Protection department in your store.

My manager asks me to pick up some carts each evening on my way to my car. What should I do?

You should tell your manager you have already clocked out, and it is a violation of company policy for them to ask you to work off the clock.

My manager has reduced my hours recently because she says we need to cut expenses. Is this a violation of the Wage and Hour section?

If you want to raise concerns about your hours being reduced, you should exercise the Open Door process by contacting your store, market, or Human Resources manager.

> Personal and moral integrity is one of our basic fundamentals and it has to start with each of us.
>
> Sam Walton

Q & A

I'm a Vision Center regional manager. I've recently invested $10,000 in an investment fund that may invest some of the money in the optical industry. Would this be a violation?

Since you don't have direct control over the investment strategy, it's not a violation.

Someone told me I could not own stock in a vendor. Is this correct?

No. The restriction is you may not have any direct financial interest in a vendor whose business you have direct or indirect influence over within your position at Walmart. There are no restrictions to financial interests in vendors you do not have business influence over.

I recently joined Walmart and I own more than $20,000 of stock in a key competitor. Must I sell this stock?

You should disclose the information to your manager and the Global Ethics Office. The Global Ethics Office will issue you an opinion with any instructions regarding any potential conflicts of interest.

Conflict of interest

General

We have a responsibility to all our stakeholders to make decisions strictly on the basis of Walmart's interests, without regard to personal gain. A conflict of interest can arise when our judgment could be influenced, or might appear as being influenced, by the possibility of personal benefit. Even if it's not intentional, the appearance of a conflict may be just as damaging to your reputation, and Walmart's reputation, as an actual conflict. We should always be on the lookout for situations that may create a conflict of interest, and do everything we can to avoid them.

It's your responsibility to tell your immediate manager about any situation that you think creates, or could create, a conflict of interest. Managers are encouraged to bring the matter to the attention of the Global Ethics Office. They will determine how to handle the situation.

Conflict of interest situations can come up in various ways. The following sections outline some of the possibilities.

Financial investments

As a representative of Walmart, you have a responsibility to make sure your personal financial activities do not conflict with your responsibilities to the company. A financial conflict of interest can arise when your judgment could be influenced, or might appear as being influenced, by the possibility of personal financial gain.

Examples of conflicting financial investments are:

- Financial interest in a vendor of Walmart, if you have direct or indirect involvement in our business with that vendor.
- Substantial financial interest in a competitor.
- Receiving personal compensation from a vendor, if you have direct or indirect involvement with our business concerning that vendor.
- Using confidential company information for personal gain.

Ownership of stock in a competitor with a market value in excess of $20,000 must be disclosed in writing to the Global Ethics Office. The Global Ethics Office will decide whether or not a conflict, or potential conflict, exists and how it should be handled.

Personal relationships with suppliers

Walmart encourages associates not to have social or other relationships with suppliers if the relationship would give the perception that a business influence is being exerted. We believe in basing our relationships with suppliers on efficient, fair and lawful business practices. The selection of suppliers must be made on the basis of objective criteria, including integrity, quality, price, delivery, adherence to schedules, product suitability, maintenance of adequate sources of supply, and Walmart's purchasing practices and procedures. We must treat our suppliers with respect, fairness, and honesty. We must not take undue advantage of a supplier by using Walmart's business influence. Also, we should expect our suppliers to follow all applicable legal requirements in their business practices.

A conflict of interest may exist if a former associate is calling on Walmart in an area in which the associate worked or had influence over while employed at Walmart. The Global Ethics Office will make the determination as to whether a conflict of interest exists.

When a former associate takes a position with, or on behalf of, a supplier, Walmart will not do business with that associate for a period of three (3) years following his or her separation from Walmart if a conflict of interest, as defined above, is determined to exist.

In addition to the restriction described in the preceding paragraph, when a former Walmart officer takes a position with, or on behalf of, a supplier, Walmart will not do business with that former officer for one (1) year following his or her separation from Walmart, regardless of the area in which the former officer was involved at Walmart.

If you believe you may be perceived as having an inappropriately close relationship with a supplier, or appear to be exerting a business influence on the supplier, inform your manager or the Global Ethics Office.

Q & A

There's a contracting company I do business with as part of my position with Walmart. They've asked me if I know of an engineer they could hire. My son is qualified and would like to work for this company. May I refer my son for the position?

No. Even though the contracting company sought your recommendation, it could be interpreted that you are using your position with Walmart to get your son a job. That would be a conflict of interest that could compromise your reputation as a representative of Walmart.

My next-door neighbor is one of my suppliers. They invited my family and me to a neighborhood party. Would it be a violation of the Personal Relationships with Suppliers policy if we went to the party?

It would be OK to attend as long as the party is open to the entire neighborhood and you're invited because you're a neighbor, not because of your position with Walmart. Remember to ask yourself, if another supplier or other associates knew of this situation, would it appear you are giving preferential treatment to your neighbor as a supplier?

Q & A

Our market electronics team is attending a training session, hosted by a supplier, to understand a new item the supplier is launching. The supplier said we will each get free t-shirts for attending the training. Can we accept the t-shirts?

Since the t-shirts are coming from the supplier and are not related to the product, and understanding of the product, they cannot be accepted. Politely decline the t-shirt and explain our gifts and entertainment policy to the supplier.

I'm attending a business training session sponsored by a professional organization. Following the first day of training, the suppliers sponsoring the event are going to provide snacks and drinks at a reception for all attendees at the session. Can I go and have snacks and a drink?

Yes. Since the reception is open to all attendees, you're not being singled out as a representative of Walmart.

Gifts and entertainment

Accepting gifts and entertainment can cause a conflict of interest, or the appearance of a conflict between personal interests and professional responsibility. The Walmart culture is to never accept gifts or entertainment from any supplier, potential supplier, government, or any person the associate has reason to believe may be seeking to influence business decisions or transactions. Associates also may not accept a gift or gratuity from a customer for work performed by the associate in a store or club, except as required by local or national policy.

We may not accept items donated to Walmart by suppliers for the purpose of raising funds for charities or non-profit organizations. Also, we should not accept or approve of them making donations on behalf of Walmart.

Our policy of declining all gifts and entertainment stems from our value of maintaining Every Day Low Costs. Since such gifts and entertainment increase the cost of doing business, we help our suppliers to give us low costs on products by not expecting the gifts and entertainment they may have to spend on other customers. We recognize, as a global company, we may encounter situations where local practices will come into play. The Global Ethics Office will review these situations on a case-by-case basis.

When you are establishing a new business relationship, make sure all parties are aware of our policy regarding gifts and entertainment. In some countries where gift giving is a custom or tradition, you should politely explain this policy to your customers and suppliers, especially prior to holiday gift-giving periods, in order to establish expectations. Also, be aware of what policies your suppliers or other business partners may have in place about this issue and take them into consideration.

Occasionally, there may be times when returning a gift would be impractical or embarrassing. In those rare instances, accept the gift on behalf of the company, report it to your manager, and give the gift to the in-country Ethics Committee or the Walmart Foundation. If either of those options are not possible, find a fair way to distribute the gift equally among the members of your department. You should immediately tell your manager or the Global Ethics Office about any gift you've been offered or received if you feel that gift might be a violation of our company's policy. If you have any questions about gifts and entertainment, you should seek assistance from your manager, the in-country Ethics Committee, or the Global Ethics Office.

You should always be aware of how the act of accepting a gift or gratuity might be perceived by the public, by other suppliers, or by other associates. When dealing with external businesses, you should ask yourself, "Would this business be offering me this gift or gratuity if I wasn't employed by Walmart?" If the answer is "no" or is unclear, you should not enter into the transaction.

Personal relationships with other associates

At Walmart, we want to provide a work environment where associates can perform effectively and achieve their full potential. We are all responsible for creating a climate of trust and respect, and for promoting a productive work environment.

There is a basic conflict of interest when you manage someone with whom you have a family, romantic, or dating relationship. Even if you're acting properly, your relationship will likely be seen as influencing your judgment. This can damage morale and disrupt workplace productivity. Therefore, you may not supervise, directly or indirectly, any family members or any associate with whom you date or are romantically involved. This includes situations where you may be able to influence that associate's terms and conditions of employment, or if that associate can influence the terms and conditions of your employment.

Walmart strives to eliminate personal relationships that interfere with work performance or which may constitute harassment.

You should ask for guidance and advice from your manager or from the in-country Ethics Committee whenever an issue comes up regarding a personal relationship. Your manager or Human Resources manager can discuss options with you, such as a possible transfer to remove the conflict.

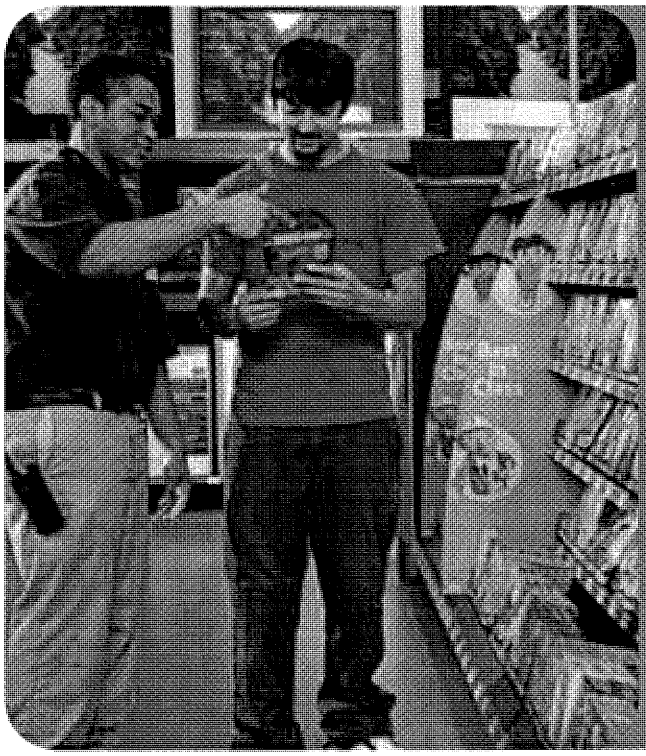
Q & A

A supplier I work with has offered me two tickets to the World Cup if I pay face value for them. Can I buy the tickets?

You should decline the offer. Although you may be paying face value for the tickets, it may not necessarily reflect the market value of the item. Some areas allow you to resell tickets, and you might be able to make a profit if you sold them. Also, there could be a gift of prestige in receiving the ability to attend a coveted event, such as the World Cup.

I'm an assistant manager of a store. Recently, I started dating another assistant manager in my store. Is this OK?

Since you do not have influence over the other assistant manager's terms of employment, it would not be a violation. We recommend you tell your store manager about the relationship so they would be cautious not to place either of you in a potential conflict situation, such as a temporary assignment of store management duties.



> The strongest bond of human sympathy outside the family relation should be one uniting working people of all nations and tongues and kindreds.
>
> Abraham Lincoln,
> former President

Q & A

I have to travel often for my job. Can I use my company laptop to check my bank account online while I am traveling?

Yes, as long as it does not interfere with work performance.

My manager told me when I travel with my laptop I should carry it on the plane with me. Is this really necessary?

Yes. When traveling with a company-issued laptop, you must carry it on the plane with you. It may not be checked with your baggage. This is necessary to protect the laptop and the information contained on it from theft, loss, misuse, or damage.

Walmart assets

We have a responsibility to our shareholders to use Walmart property and assets for Walmart business, and not allow them to be used for any type of personal gain. You're responsible for maintaining Walmart property under your control and should take reasonable steps to protect it from theft, misuse, loss, damage, or sabotage.

Where permitted by law, associates have no expectation of privacy as to the use of Walmart communication tools (such as e-mail or voice mail). Walmart has the right to and does monitor communications tools, including the content and usage of such tools.