

Conflict Minerals Policy

Background

Subsequent to the Walmart/Massmart merger, Massmart is now required to comply with certain US laws, including a recently enacted law relating to minerals mined in conditions of armed conflict and/or human rights abuses otherwise known as "Conflict Minerals". Wal-Mart Stores, Inc. and its global affiliates ("Massmart") have on-going compliance obligations based on the Conflict Minerals provision of the Dodd-Frank Wall Street and Consumer Protection Act and the Securities & Exchange Commission ("SEC") Rule 13p-1 (the "Rule"). Specifically, this law requires Walmart *via* Massmart to collect necessary Conflict Minerals data from suppliers on the source origin of (3TG) Minerals, Tin, Tantalum, Tungsten, and Gold, used in the products you supply to our stores. Supplier data collected in 2013 has been used in our first annual Conflict Minerals report issued to the US regulators in May 2014 for products sold in calendar year 2013.

To coincide with our first Conflict Minerals Report, Walmart has posted its Conflict Minerals Policy as required by the rule.

Policy

The Securities and Exchange Commission ("SEC") has adopted rules requiring publicly traded companies to report on products they manufacture or contract to manufacture that contain tin, tantalum, tungsten or gold ("3TG" or "conflict minerals") mined in the Democratic Republic of the Congo and adjoining countries ("DRC Countries") under circumstances that contribute to or support human rights violations.

As a member of the Retail Industry Leaders Association's (RILA's) Conflict Minerals Programme Executive Committee, we have partnered with other retailers to produce training materials and tailor the questionnaire originally developed by the Electronics Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) to be more specific to retail suppliers. We have also engaged third party firms with specialized experience in various aspects of conflict minerals to assist Walmart/ Massmart in the development and implementation of our programme, which includes due diligence activities consistent with the Organisation for Economic Co-operation and Development (OECD) Guidelines.

Walmart/ Massmart understand that awareness and cooperation among its supply chain participants is essential to any responsible sourcing initiative. By holding product suppliers accountable for the principles in this policy, Walmart/ Massmart believes its conflict minerals programme will help drive necessary transparency in the supply chain and further the ultimate goal of ending armed conflict in the DRC.

Walmart/ Massmart expects its product suppliers to actively support Walmart/ Massmart's conflict minerals compliance efforts by:

- adopting responsible mineral sourcing policies in dealing with their supply chains that are consistent with this policy and the OECD guidance,

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Company Secretary: P Sigsworth *USA **UK

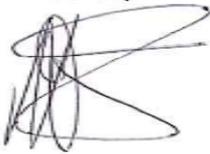
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- supplying products to Walmart that do not contain 3TG minerals that have been sourced under circumstances that contribute to or support human rights violations in the DRC, and
- providing evidence to support their representations as to the conflict minerals status of their products upon request.

More information about the efforts of the RILA Conflict Minerals Programme can be found at www.conflictmineralscompliance.org.

Please direct Conflict Minerals related enquiries to CnfMnSA@wal-mart.com

Yours faithfully



Thashmi Doorasamy
Group Compliance Officer
Massmart

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