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Christen Dobson & Marti Flacks Business & Human Rights Resource Centre 120 Wall Street, 16th Floor New York, NY 10005

Christen and Marti,

Thank you for reaching out regarding gun violence. Our hearts continue to be with our associates in El Paso and Southaven and we are focused on the safety of our associates and customers in all our stores and clubs. Those tragic and painful events will be with us forever, and our hearts go out to the families that were affected. As it's become clearer that the shooting in El Paso was motivated by hate, we are more resolved than ever to foster an inclusive environment where all people are valued and welcomed.

We will strive to use these experiences to identify additional actions we can take to strengthen our processes, improve our technology and maintain a safe environment in our stores. We're also thinking through the broader issues related to gun violence and things we should do to help create safer communities.

In the meantime, let us share with you some information about our current policies and procedures regarding gun sales.

1/ Currently, we sell firearms/ammunition to meet the needs of our hunting/sportsman customer in select stores. Firearms/ammunition represent a small portion of Walmart's total hunting, camping and fishing category and an extremely small part of Walmart total sales.

- Contrary to some media reports, we estimate that we represent about two percent of the US market for firearms today, which we believe places us outside at least the top three sellers in the industry. We estimate we have about a 20 percent share of ammunition.
- We stopped selling handguns in every state (except for Alaska) in the mid-90s.
- We stopped selling military-style rifles such as the AR-15 in 2015.

2/ We have attempted to take common sense steps that allow us to serve customers while creating a safer environment.

- We raised the age limit to purchase a firearm or ammunition to 21 in 2018.
- Walmart only sells a firearm after receiving a "green light" on a background check, while federal law only requires the absence of a "red light" after three business days. We don't



- sell a firearm until we receive a "green light" regardless of the time period.
- We videotape the point of sale for firearms, only allow certain associates to sell firearms, and secure firearms in a locking case with individual locks, among other measures.

3/ In the national conversation around gun safety, we're encouraged that broad support is emerging to strengthen background checks and to remove weapons from those who have been determined to pose an imminent danger. We do not sell military-style rifles, and we believe the reauthorization of the Assault Weapons Ban (or other measures) should be discussed to determine how best to keep weapons made for war out of the hands of mass murderers. We must also do more to understand the root causes that lead to this type of violent behavior.

We are a learning organization, and, as you can imagine, are thinking about our own actions and those we should encourage others to take. By far, our number one priority is safety. Sales and profit are not driving our decisions here. We'll take the necessary time to think this through and share our conclusions at the right time. Please know that we're listening to you and to all the others that want their voices heard.

Sincerely,

Katherine Neebe

Senior Director – ESG, Trust & Transparency

Walmart Global Responsibility

Additional Background Information

Walmart leads the industry and goes beyond what the law requires by requiring a passing background check before a firearm is sold. The law would allow the sale of a firearm if no response to a background check request has been received within three business days, but our policy prohibits the sale until an approval is given. We have processes in place for hand gun ammunition to be locked up and inaccessible to customers without associate intervention. We also have register prompts which call for identification and age verification on all ammunition sales.

In February 2018, we announced our decision to restrict sales of firearms and ammunition to individuals over the age of 21. We also removed items from our website resembling assault-style rifles, including nonlethal airsoft guns and toys. You may recall that since 2015, Walmart has not sold AR-15 style firearms. In addition, we do not sell any type of AR-15 accessory, including bump stocks and high- capacity magazines. These items are also listed on our prohibited items list for online marketplace sellers.



We also developed software designed to detect transactions that are likely straw purchases. Using this software, we are better able to prevent sales where a person who is legally entitled to purchase a firearm attempts to purchase for a person who cannot legally obtain a firearm for themselves.

Walmart became a charter member of Mayor Bloomberg's coalition against illegal guns in 2008 and adopted the 10-point code established by the Responsible Firearms Retailer Partnership that goes beyond what the law requires. We were the first retailer to join the coalition. The key components of the Responsible Firearms Retailer Partnership are:

- 1. Videotaping the Point of Sale for All Firearms Transactions. Participating retailers will videotape the point of-sale of all firearms transactions and maintain videos for 6 months to deter illegal purchases and monitor employees.
- 2. **Deterring Fake IDs.** Participating retailers will only accept valid federal- or state-issued picture IDs as primary identification. Retailers will utilize additional ID checking mechanisms.
- 3. **Consistent Visible Signage.** Participating retailers will post signage to alert customers of their legal responsibilities at the point-of-sale.
- 4. **Employee Background Checks.** Participating retailers will conduct criminal background checks for all employees selling or handling firearms.
- 5. **Employee Responsibility Training.** Participating retailers will participate in an employee responsibility training program focused on deterring illegal purchasers.
- 6. **Inventory Checking.** Participating retailers will conduct routine audits.
- 7. **No Sales Without Background Check Results.** Participating retailers would prohibit sales based on "default proceeds," which are permitted by law when the background check has not returned a result within 3 days.
- 8. **Securing Firearms.** Participating retailers will maintain firearms kept in customer accessible areas in locked cases or locked to racks.