Walmart > < Statement of Ethics

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.

My wife recently joined Walmart and we own more than \$20,000 of stock in a key competitor. Must she 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





Walmart Training Manual For Security

Mark Steyvers

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