

2024

# Code of Conduct & Ethics

NORDSTROM



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# A Message from Pete & Erik Nordstrom



**Erik Nordstrom**  
CEO



**Pete Nordstrom**  
President & Chief Brand Officer

Since Nordstrom first opened its doors in 1901, we've been dedicated to operating as a company known for treating its customers, business partners, and employees fairly and with respect. This starts with having very high standards when it comes to matters of integrity, and always striving to do business in a legal and ethical way, especially when it might seem hard.

Our employee Code of Conduct & Ethics helps define and clarify what doing business legally and ethically looks like. Regardless of leadership level, role, or business unit, no employee at Nordstrom should ever compromise on this expectation to achieve a business objective. Although we are 'here to win,' we are committed to winning by following our Code and acting with integrity.

We encourage you to refer to our Code of Conduct & Ethics often. Use our Open Door and speak up if you become aware of any potential misconduct. We are all 'owners at heart', and it's up to each and every one of us to use good judgment and model our values in service of our customers and each other.

Thank you for upholding our expectations and staying true to our values.






**Pete & Erik**

# Putting Ethics to Work



# Our Values: The Fabric of Nordstrom

We believe that having clear values helps us achieve better outcomes. Our values help us attract, retain and engage talented people who have a shared passion for our beliefs and help us stay true to our core principles.

Our Nordstrom Values		How the Code Supports Them
	<b>Customer Obsessed</b> We strive to know our customers better than anyone else. We listen, anticipate, build trust, and move with speed to deliver on their needs. We make customers feel good.	Our customers want to feel good about where they shop. By committing to ethical behavior, we help ensure customers can be proud to say they shop at Nordstrom.
	<b>Owners at Heart</b> We treat every interaction as an opportunity to make an impact and deliver excellence. We collect the right input, we are empowered to use good judgment, we own our decisions, and keep it simple. We leave it better than we found it.	Exercising good judgment is key to owning our business. This Code helps you understand what exercising good judgment means with respect to our ethical business practices.
	<b>Curious and Ever Changing</b> We approach problems with curiosity and create solutions. We unlock potential to be bold, think big, and inspire innovation. We disrupt the status quo to solve customer needs in new and relevant ways.	We are constantly thinking of new and creative ways to better serve our customers. This Code helps provide guardrails of what's permissible and ethical as you challenge the status quo.
	<b>Here to Win</b> We're committed to delivering results, both today and tomorrow. We win as a team by supporting and challenging one another to be better every day.	We don't cut corners, and we don't break rules to get ahead. We are 'here to win', but only if we can win by doing business ethically.
	<b>We Extend Ourselves</b> We treat each other with respect and kindness. We do the little things that make a big difference. We create a welcoming environment, helping people feel connected, valued, and part of one community.	Creating a safe and inclusive environment for everyone who enters our doors is core to who we are. Following the Code helps ensure everyone feels valued at work.

For us, it starts with **One Rule: Use Good Judgment in All Situations.**

In the coming pages, you'll learn more about what it means to 'use good judgment' when working for Nordstrom.

# Use Good Judgment: Follow Our Code and Policies

## What is our Code of Conduct & Ethics?

Nordstrom is committed to doing business honestly, ethically, and in compliance with all applicable legal requirements. The Nordstrom Code of Conduct & Ethics or ‘Code’ is the foundation of that commitment. Although the Code can’t anticipate every situation you will encounter in your work—no one document could do that—it can serve as a starting point for understanding Nordstrom’s policies and approach to ethical business practices. If you still have questions about what to do in a particular situation, please use the [Policy and Resources Quick Guide](#) section to get more information or reach out to your manager.

## Who must follow the Code?

The Code applies to all employees of Nordstrom—regardless of your level at Nordstrom, the job you hold, or where you work. Complying with the Code is one of your primary responsibilities as an employee, and we take an employee’s failure to live up to this responsibility seriously. If you violate the Code, you may be subject to disciplinary action, up to and including termination of your employment.

## Don’t forget to follow our policies

The Code provides a general framework for how we do business ethically. In some cases, Nordstrom has also adopted policies to provide more detail on the expectations that apply to certain areas of our business. As you review the Code, you’ll see some of these policies linked in the “Information looks good on you” section for each topic. All policies can also be found on [mynordstrom > Company Policies & Practices](#) or by talking with your manager. Important messages and notices may also be posted in Workday, which you are expected to review. If you are a people leader, you must also familiarize yourself with the [policies](#) that apply to the teams you support. You are expected to comply with all policies that apply to your area of responsibility. Nordstrom will hold you accountable (including potentially terminating your employment) if you do not follow all applicable policies.

### At will employment

Your employment with Nordstrom remains ‘at-will’, which means, for example, both you and Nordstrom reserve the right to end the employment relationship at any time, with or without notice, with or without reason. The Code does not create an employment contract or guarantee of employment for any specific period of time or create any specific employment rights.



## Your rights as an employee

Nordstrom will always follow the law and respect your rights under labor and employment laws. Nordstrom supports your rights under the National Labor Relations Act. For example, regardless of anything in this Code, you are free to discuss, debate, criticize, record, or share with others information about your or other employees’ wages, hours, working conditions, conditions of employment, unionization, or other personal information related to employment in support of your rights or others’ rights under Section 7 of the National Labor Relations Act and federal, state or local laws. You are also free to choose *not* to engage in any of these activities. There is no requirement for management pre-approval for exercise of these rights.

Nordstrom will also not take any action to impede you from communicating with any regulatory or self-regulatory organization or agency such as the Securities and Exchange Commission, the EEOC, the U.S. DOL or OSHA or similar state agency. Nothing in this Code or other Nordstrom policies, including the references to the protection of private and personal information in the Protect Personal Information policy, is intended to restrict these rights. Nordstrom will not discipline, retaliate, or terminate your employment for exercising these rights.

# Responsibility is Woven into our Culture: Employee and Leader Expectations



## Employee Responsibilities

All employees must:

- ✔ **Follow the law.** Always follow the laws of any jurisdiction in which Nordstrom operates.
- ✔ **Understand and follow the Code and our policies.** Make sure you read, understand, and follow the Code and our policies.
- ✔ **Ask for help.** If you are unsure what to do in a situation, including how to comply with our Code, policies or the law, use your resources to ask for help. Connect with your manager or other resources in [How Nordstrom Supports You and the Communities We Serve](#) section to get support.
- ✔ **Show respect to others.** Foster a respectful and inclusive work environment with a strong commitment to ethics.
- ✔ **Do your part.** Timely complete assigned compliance activities such as compliance training or process controls.
- ✔ **Report concerns.** If you become aware of any potentially illegal or unethical conduct, including a violation of the Code or other policies, immediately report it. If someone pressures you to do something that might violate the Code or our policies, report that also.

## Leader Responsibilities

Our leaders have additional responsibilities. Leaders must also:

- ✔ **Be a role model.** Set the tone for those around you. Act ethically in all situations and foster a culture of honesty, integrity, and adherence to the Code, our policies, and compliance controls.
- ✔ **Hold your team accountable.** Make sure the employees you support understand the Code and our policies. Regularly reinforce your expectation that your team follows the Code, our policies, and the law.
- ✔ **Model our Open Door.** Ensure you create an environment where employees are encouraged to ask questions and raise any concerns they have. Listen to their feedback, promptly address issues that fall within your responsibility, and promptly escalate issues that are beyond your responsibility.
- ✔ **Not allow retaliation.** Treat your team fairly and with respect. Be mindful that neither you nor others engage in activity that could be seen as discouraging employees from raising concerns or exercising their rights.



# Make Ethical Decisions

When you are faced with a dilemma and the best next step isn't clear, ask yourself the following questions to help guide your way:

~~YES~~ ~~NO~~ ? Is it legal?

~~YES~~ ~~NO~~ ? Is it in line with our Code and policies?

~~YES~~ ~~NO~~ ? Is it in the best interest of Nordstrom?

~~YES~~ ~~NO~~ ? Am I comfortable with others knowing about my decision?

~~YES~~ ~~NO~~ ? Would I or Nordstrom feel comfortable if my actions were reported in the media?

**YES** If you can answer **YES** to all these questions, then the action you want to take is probably ok.

**NO** ? If you answer ? or **NO** to any of these questions, do not move forward. Reach out for more guidance before you act. You can get support from any of these resources: your manager or any leader, Human Resources or the Employee Contact Center.

**If you hear someone say these phrases, stop and seek support:**



- “No one is going to know we are doing this. Don't worry.”
- “Other companies do this so it must be okay.”
- “We've always done it this way, and no one has ever said anything or gotten in trouble.”





# Speak Up and Report Concerns



## Remember the 'Open Door'

We believe great ideas and clear, open, honest, and respectful communication help move our business forward. We want you to feel comfortable sharing your thoughts and concerns with us. All our leaders – from your manager all the way down to our Executive team – have an Open Door, which means you can reach out to any leader to discuss questions or concerns you may have.

## Always report concerns

If you become aware of any potential misconduct, including violations of our Code or policies or other illegal or unethical behavior, you must promptly report it. This includes any potentially illegal or unethical conduct by a third party with whom Nordstrom does business.

### Report using one of the following options:

- Talk to your manager or any other leader.
- Reach out to the Employee Contact Center at 855.NORDYHR (667.3947), or by visiting Ask HR on MyNordstrom.com.
- Talk to anyone in Human Resources.
- Contact our ethics hotline at 1.888.832.8358 or by visiting [nordstrom.ethicspoint.com](https://nordstrom.ethicspoint.com). When you report concerns through our ethics hotline, you may choose to remain anonymous.

## What happens once I report a concern?

All reported concerns are reviewed and routed to the appropriate Nordstrom resource for investigation and/or response. If a concern requires an investigation, it will be investigated by an appropriate and objective person. Employees are expected to cooperate in any investigation of potential misconduct. Nordstrom takes concerns seriously and will take any appropriate measures needed based on its review. Nordstrom and employees should use best efforts to respect privacy and the integrity of any investigation.

## We don't tolerate retaliation

We do not permit retaliation of any kind against employees who report misconduct or possible misconduct, raise a concern, participate in an investigation, or engage in legally protected activities. Anyone who retaliates will be subject to disciplinary action, up to and including termination of employment. If you feel you have been subject to retaliation, immediately report it using the reporting options listed above. See our [Anti-Retaliation Policy](#) for more information.





# Doing Business with Integrity

# Prevent Bribery

Corruption can harm the communities we serve and the communities where the products we sell are made. We do not tolerate corruption or bribery of any kind.

Our success is rooted in the trust our customers and partners place in us. We are committed to doing business honestly, which includes not seeking an improper advantage through corruption or bribery. You are never permitted to give or receive bribes and must monitor your business partners closely to ensure they do not pay bribes.

## Exercising good judgment means:

**Not bribing government officials or employees of other companies.** You must never offer, promise, give, or receive a bribe in your work for Nordstrom. This includes directly or indirectly:

- Offering, promising or giving a bribe (even if very small) to expedite a routine government action (sometimes referred to as a facilitation or ‘grease’ payment).
- Offering, promising or giving a bribe to a representative of another company to gain an undue or improper advantage.
- Using a third party to offer, promise or give a bribe on your behalf.
- Accepting a bribe from a government official or a representative of another company.

### Being careful when working with government officials.

If your job duties involve working with government officials or managing a business partner who works with government officials on our behalf, make sure you understand Nordstrom’s Anti-Corruption policy and the role you play in complying with it.

**Keeping accurate books and records.** You must maintain accurate books and records, including any payments made to third parties.

### What is a bribe?



Bribes can take many forms and can include anything of value. Examples include money, gift cards, merchandise, discounts, travel, charitable or political contributions, or offers of employment or internships.

### Who is a government official?



“Government officials” can serve in a broad variety of roles. They include employees or officials of a government; political parties or their officials; candidates for political office; and employees of companies and organizations if owned in whole or in part by a government.

## Should I?



*A supplier tells me that giving money to a government official is customary in their country to get our order processed sooner. Should I provide the government official with this payment?*

No. Even if this type of payment is common in another country, it violates our policies. You are never allowed to secure an improper advantage by providing anything of value to a government official.



## Can I give a gift?

Providing gifts to government officials creates unique risks to Nordstrom, so contact [ethicsandcompliance@nordstrom.com](mailto:ethicsandcompliance@nordstrom.com) for guidance before providing any such gift.

## Information looks good on you.

Stay up to date on our policies.



[Anti-Corruption Policy](#)

# Compete Fairly

We are committed to competing fairly and ethically in the marketplace. We are ‘here to win’ but never want to win by cheating or gaining an unfair advantage.

Unfair competition can harm our customers by raising prices, reducing quality, or limiting customer choices. We are committed to complying with all applicable antitrust laws and competing in the marketplace in a fair and ethical way. This includes acting independently of our competitors in the market, without “colluding” or sharing commercially sensitive information.

## Exercising good judgment means:

### Not making anti-competitive agreements with competitors.


Do not engage or enter into any formal or informal agreements, price fixing, or understandings with competitors on topics such as prices or to sell products at a specific price; markups or markdowns; allocation of customers, markets, or products; or wages or benefits.

### Being careful in your discussions with competitors.

Do not discuss commercially sensitive topics with competitors, such as pricing, contract terms, market strategy, or wages. Be aware that even casual conversations, such as those at trade association meetings or conferences, could be considered anti-competitive and you must approach those conversations with care if competitors are present.


**Being cautious in your discussions with vendors.** Certain interactions with vendors can create antitrust compliance concerns, particularly as they relate to pricing. Remember that Nordstrom (not our vendor) has the final say on pricing and discounting of products.

**Not gaining or using competitor information in an unfair manner.** If you gather information about our competitors, use honest methods, including sources such as industry publications or the internet. Never use other companies’ confidential information or encourage others (including suppliers) to give you confidential information about our competitors. You should never use confidential information you may possess from a previous employer.

**Can I ask?** 

*We recently hired someone who worked for one of our competitors. Can I ask them about their prior employer’s confidential strategy around gaining market share?*

No. It’s never OK to ask someone to disclose confidential information from a previous employer. We have a responsibility to gather information ethically.

**Would that be allowed?** 

*A competitor is asking if we would stop selling a certain brand of jeans. In return, they would stop selling a certain brand of shoes that we also sell. Would that be allowed since we are not fixing prices?*

No. This would be considered collusion where two companies have an agreement on product placement. It can create an unfair advantage and be harmful to our customers.



## What do you do?

If you find yourself in a conversation that turns to a commercially sensitive topic or that raises antitrust concerns, you should stop the conversation or remove yourself from it.

If you have questions or need additional guidance, contact [legalsupport@nordstrom.com](mailto:legalsupport@nordstrom.com).

## Information looks good on you.

Stay up to date on our policies.



[Antitrust Policy](#)

# Trade Securities Ethically

The free market only works if investors trade securities fairly and based on publicly available information. Never trade Nordstrom or other companies' securities based on inside information.

Through your work at Nordstrom, you will learn information about Nordstrom and other companies that is not known to the general public. 'Insider trading' is when you use material, nonpublic information about Nordstrom or another company to trade the securities of that company. Insider trading is unethical and illegal.

## Exercising good judgment means:

**Never sharing inside information.** Never share inside information with anyone outside of Nordstrom, including family and friends. Only discuss inside information with other Nordstrom employees or vendors if they need access to that information to do their job and are under an obligation to keep the information confidential. When discussing inside information be aware of your surroundings to avoid someone overhearing.

**Never using inside information in financial investing.** Do not buy, sell, or otherwise trade, or enter into any contract to trade in Nordstrom securities or securities of another company while in possession of inside information about Nordstrom or that company.

**Never giving investing advice based on inside information.** Never tell or suggest that someone else, either inside or outside Nordstrom, buy or sell securities of any company based on inside information you have. Doing so is a form of insider trading that is called 'tipping' and it is unethical and illegal.

**Understanding the additional rules that may apply to your role.** Depending on your job, you may only be allowed to trade securities at certain times or may be subject to additional trading restrictions. Make sure to review our [Insider Trading Policy](#) and comply with all rules that apply to your role.



### Need help?

If you're not sure whether you have inside information or have questions about insider trading rules, contact [corporatesecretary@nordstrom.com](mailto:corporatesecretary@nordstrom.com) for guidance **before** you trade securities or share the information.

## What's 'inside information'?

**Inside information is 'material nonpublic information.'** This means the information is both:

- **'Material,'** meaning that an investor would likely consider it important in making a decision to buy, sell, or hold the security; and
- **'Nonpublic,'** meaning it hasn't been broadly released to the general public.



### Examples

- Earnings or non-public sales information, such as actual earnings information or projections of future earnings or losses.
- Pending or prospective mergers or acquisitions.
- Gain or loss of material contracts.
- Development of a new product or service.
- Declaration of a stock split or dividend or significant increases or decreases in dividends.
- Significant pending regulatory action or threatened litigation.
- Changes in senior leadership or key suppliers or vendors.
- Financial liquidity problems.
- The offering of additional securities or pending announcements related to stock buy-back programs.

## Is this insider trading?



*A department manager reviewed sales reporting and noticed that Anniversary sales are going through the roof. He thinks JWN's stock price will go up once we release this news to the public. He's excited and offhandedly tells his friend that she may want to buy JWN stock because "good things are happening at work." Is this considered insider trading?*

Even though it was said as an offhand comment, this could be considered providing investing advice based on inside information. We cannot use inside information such as non-public sales results to invest in JWN stock or to suggest that others do so.

## Information looks good on you.

Stay up to date on our policies.



[Insider Trading Policy](#)

# Protect Personal Information

We are committed to handling personal information responsibly. We always follow our privacy and security policies and use and handle all personal information with respect and care.

Protecting the personal information of customers and employees is critical to upholding the trust those individuals place in us. You are expected to collect, use, store, and dispose of any personal information in your care according to our policies and procedures.

## Exercising good judgment means:

**Recognizing ‘personal information.’** Personal information is information about a person that can identify or be used to identify who they are, including customer, employee, or vendor information. Different types of personal information can be used on their own or in combination with each other to identify a person. Some examples include:

- Names
- Mailing, Email, and Internet Protocol (IP) Addresses
- Phone Numbers
- Videos, photographs, or other images
- Birth Dates
- Social Security numbers
- Geolocation information
- Purchase and return information
- Health and prothesis information
- Cardholder or other account data
- Customer lists or profiles
- Account credentials

**Keeping personal information private.** You must only collect personal information for legitimate business purposes, use it for the purposes it was intended for, and retain it securely. To protect the information in your care, you must always follow our privacy and information security policies and procedures. Remember, you must:

- Never use personal information for your own use.
- Access only the personal information you need to do your job.
- Collect personal information only if there is a business need and use and store it only in Nordstrom approved technology and tools.

- Only share personal information with those that need access to it to do their job and are authorized to access that information. Personal information should never be disclosed to individuals or entities not authorized to receive it.
- Return or dispose of personal information according to our retention and storage policies including when you change roles or leave Nordstrom. You must never retain or use any personal information you received or accessed while employed at Nordstrom after you have left Nordstrom.

**Reporting lost or exposed personal information.** If you believe that personal information may have been lost, stolen, or disclosed to an unauthorized third party (accidentally or deliberately) immediately report it to the Privacy team by submitting a [Security and Privacy Incident Report form](#). Work with your manager if you have questions.

### Know your rights.

Nothing in this Code of Conduct, including references to personal information, is intended to restrict your ability to exercise your rights, individually or with others, under Section 7 of the NLRA. For more information see the [Your Rights As an Employee](#) Section.



**Information looks good on you.**  
Stay up to date on our policies.

[Careers Privacy Policy](#)

[Privacy Policy](#)

[Personal Information Management Policy](#)

# Maintaining Trust



# Avoid Conflicts of Interest

We value fair and honest dealings and expect you to uphold these values by avoiding conflicts of interest.

A conflict of interest occurs when your personal interests interfere with, or appear to interfere with, the interests of or service to Nordstrom. The overarching principle is that your personal interests should not be placed improperly before the interests of Nordstrom.

## Exercising good judgment means:

**Not using your position for personal benefit.** Your role at Nordstrom may give you the ability to influence Nordstrom or its partners directly or indirectly. You may not use your role at Nordstrom to receive an improper personal benefit or to cause Nordstrom to act or not act for your own personal benefit.

**Disclosing potential conflicts.** You must report any actual, perceived, or potential conflicts of interest to the Office of Ethics and Compliance at [ethicsandcompliance@nordstrom.com](mailto:ethicsandcompliance@nordstrom.com). You should take a broad view in identifying potential conflicts and think of how a situation would appear to outside parties. If you are unsure whether a situation creates a conflict of interest, please contact the Office of Ethics and Compliance.

**Being aware of conflicts that arise from your personal and family relationships.** Conflicts of interest can arise not just from your own actions, but also from actions taken by your family members, people you have a close personal relationship with, or others who live in your household. Be aware of and report to [ethicsandcompliance@nordstrom.com](mailto:ethicsandcompliance@nordstrom.com) any actual, perceived, or potential conflicts that arise due to your personal or family relationships.

**Avoiding outside employment and business interests that could create conflicts.** Working another job may need to be disclosed if it could appear that your and Nordstrom's interests are in conflict. You may not use your position to promote a side business or use Nordstrom's resources for a side business. Your side business cannot interfere with your work at Nordstrom.

**Being mindful of workplace relationships.** Making decisions that are in the best interest of Nordstrom can be difficult if the decision involves someone you have a close personal relationship with. If you directly or indirectly support an employee who is a family member or with whom you have a current or prior personal relationship, you must report it to the Employee Contact Center.

**'Support'** means you have control or influence over that employee's work schedule, job responsibilities, career opportunities, pay or other employment conditions. See the [Workplace Relationships Policy](#) for more details.

## What can create a conflict of interest?



Although it is impossible to list every situation where a conflict of interest could arise, some examples of potential conflicts of interest include:

-  You are in a position to direct Nordstrom's business to a vendor your family member works for.
-  You or a family member has an ownership interest in a company that competes with, does business with or wants to do business with Nordstrom. (Note this does not include an ownership interest of less than 2% in a publicly traded company.)
-  You use your position at Nordstrom or Nordstrom's resources to promote a side business.
-  You have a romantic relationship or close personal friendship with an employee you directly or indirectly support.



## Remember appearances matter

When dealing with conflicts of interest, remember that it isn't just about whether an actual conflict exists. It is also about how others would perceive the situation. If your actions would make anyone inside or outside Nordstrom question your loyalty to Nordstrom or motives, a perceived conflict of interest exists, and you must report it.

## Information looks good on you.

Stay up to date on our policies.

[Conflicts of Interest](#)

[Workplace Relationship Policy](#)





# Accept Gifts Responsibly

To honor our commitment to fair and honest dealings with our customers and suppliers, we must consider why a gift is being offered and if it could appear to unfairly influence a business decision.

Seeking or accepting gifts, trips, event or entertainment invitations, or other items of value from individuals and organizations with whom we do business — or may potentially do business — could create the impression that the gift improperly influenced our decision to do business with the gift giver. To avoid any impression that our business decisions were improperly influenced, we only accept offers of gifts or hospitality that are modest in value.

## Exercising good judgment means:

**Only accepting gifts and entertainment that are modest in value.** We know that the exchange of gifts and entertainment in business is common. However, it can also create the impression that our business decisions were improperly influenced by the gift. To avoid any appearance of a conflict of interest, you must only accept gifts or entertainment that are infrequent or occasional in nature and modest in value. See our Gifts Policy for more details on the requirements that must be met to accept an offer of gifts or entertainment. In some cases, you must have pre-approval before accepting such an offer.

**Never accepting a gift of cash or gift cards.** You are never allowed to accept a gift of cash or a cash equivalent (such as a gift card). The only exception to this rule is if you work in a tip-eligible role and the cash is a tip for your service. In such cases, you must follow the Employee Tip Policy and accurately report all tips.

**Getting approval for vendor-sponsored trips.** Depending on your job function, you may be asked to attend vendor-sponsored business trips or events. These could include trips to view merchandise or attend educational or business-related conferences. Such trips are generally permitted if they have a business purpose, and you receive approval from an Executive Team leader to attend.

### Examples of acceptable gifts:

- ✓ A gift bag at a supplier's conference, filled with things like a pen, a notebook or snacks.
- ✓ A business lunch at a casual restaurant with a new supplier.
- ✓ A small, branded item from a supplier, such as a hat or t-shirt with the supplier's logo on it.

### Examples of unacceptable gifts:

- ✗ Expensive or exclusive seats (such as front row or suite level) at a concert, sporting event, or theatre show.
- ✗ A gift basket filled with expensive items like fine wine and gourmet foods.
- ✗ Free airfare or accommodations to attend a golf tournament or sporting event with a vendor.

Can I accept it?



What do I do if?



*What do I do if a vendor gives me a gift that doesn't comply with our policy?*

Thank the vendor for their kindness but let them know you cannot accept and notify the vendor of our gift restrictions. You should also return the gift to the vendor unless doing so would be impractical. If you need more advice on what to do, please reach out to [ethicsandcompliance@nordstrom.com](mailto:ethicsandcompliance@nordstrom.com).

Information looks good on you.

Stay up to date on our policies.



[Gifts & Entertainment Policy](#)

[Gratis Policy](#)

[Employee Tip Policy](#)

# Prevent Money Laundering and Fraud

We are committed to preventing money laundering and fraud. You must remain vigilant and follow all procedures aimed at preventing money laundering.

Money laundering is a process used to move funds made illegally through legitimate businesses to disguise their source and make them appear legitimate. These illegal funds can come from many types of criminal activity, including drug transactions, fraud or terrorism. While the vast majority of our customers are honest, some individuals may attempt to use Nordstrom to aid them in laundering money or defrauding our customers. You must follow all procedures that help prevent our business from being used to aid illegal activity.

## Exercising good judgment means:

### Following all transaction reporting requirements.

We are committed to reporting all required transactions to government authorities. You must follow transaction reporting processes, including those for large cash transactions. Remember to collect all customer information needed to report applicable transactions.

### Knowing the rules around gift card transactions.

Gift cards can be used to facilitate money laundering. You must follow all ringing procedures related to gift card sales including following all dollar amount limits for gift cards.

**Staying alert and reporting any suspicious transactions.** Make sure you remain alert for 'red flags' that may indicate a transaction is suspicious or fraudulent. If you believe a transaction may be suspicious, do not alert the customer or vendor to your concern. Instead, gather as much information as you can about the transaction and report it to [ethicsandcompliance@nordstrom.com](mailto:ethicsandcompliance@nordstrom.com).

## Stay alert for suspicious transactions by watching for:



Customers or vendors evading requests for additional information about their transaction.



Customers making purchases in a way to avoid transaction reporting requirements (e.g., making multiple small transactions to avoid government reporting requirements for large transactions).



Requests from a customer or vendor for secrecy (e.g., withholding identity).



Indiscriminate purchases without regard to value or appearance (e.g., customer asks to buy ten "expensive" watches without asking about fit, brand, etc.).



Buying gift cards for an unknown person, such as a government entity like a tax authority or law enforcement.



**Information looks good on you.**

Stay up to date on our policies.

[Anti-Money Laundering Policy](#)

# Select Ethical Business Partners

We are committed to only working with business partners that meet our high standards of ethical conduct.

We engage many business partners (including suppliers, vendors, manufacturers, agents, and contractors) throughout our business. These business partners' actions can reflect on us — both positively and negatively — so we must make sure we are partnering with organizations that meet our high standards of ethical conduct.

## Exercising good judgment means:

**Conducting due diligence.** Before you engage a business partner, conduct due diligence to ensure they do business ethically and are the best organization for Nordstrom to work with. When selecting business partners make your choice objectively, considering a variety of factors such as reputation, price, quality, trustworthiness, reliability, or financial strength.

**Following our contracting and vendor set up processes.** When engaging a business partner, follow all our contracting and vendor set up policies and processes. This includes complying with our Non-Merchandise Third-Party Engagement Policy & Procedure or obtaining a security or privacy assessment if the supplier engagement involves the use of technology or customer or employee personal information. These processes are a critical component of the due diligence Nordstrom conducts to make sure we are working with vendors that align with our values and standards, as well as complying with legal restrictions such as those prohibiting dealing with sanctioned or restricted parties.

**Understanding our business partner policies.** We require all business partners to comply with our [Partner Code of Conduct](#), contractual terms, and other applicable supplier policies. Make sure our business partners understand this expectation. Familiarize yourself with relevant policies and contracts so you can help hold our business partners accountable.

**Treating our business partners fairly.** Our relationships with our business partners should be built on a foundation of mutual trust. In your dealings with our business partners, treat them fairly and honestly, avoid conflicts of interest, and never offer or provide anything to our business partners in exchange for giving Nordstrom an unfair advantage.

### Remember our rules on gifting.

We know the exchange of gifts and entertainment in business is common. However, it can also create the impression that our business decisions were improperly influenced by the gift. Remember to communicate to our business partners regarding the limits we place on gifts from third parties.



### Speak up.

If you believe a business partner may be doing business unethically, including violating the law, our policies, or the terms of our contract with them, report the issue immediately through one of the reporting options listed in [Speak Up and Report Concerns](#).



## Information looks good on you.

Stay up to date on our policies.

[Partner Code of Conduct](#)

[Non-Merchandise Third Party Engagement Policy](#)

[Contingent Workforce Policy](#)

# Maintain Accurate Records and Reporting

We are committed to presenting honest and accurate information about our business to external stakeholders. Ensuring we maintain accurate records is the foundation of this commitment.

We work hard to be honest and forthright in all aspects of our business. This includes following all applicable financial reporting and accounting laws, rules and regulations. We expect you to share in this responsibility for accurate and ethical accounting by following all Nordstrom accounting policies and internal controls, as well as record retention policies.

## Exercising good judgment means:

**Recording transactions accurately.** You must always timely and accurately record transactions. This includes ensuring that all information you report is complete, attributed to the appropriate account or department, and reported in the right time period. Never falsify a record or transaction or speed up or slow down reporting a transaction to hit a budgetary goal.

**Knowing your responsibilities regarding financial reporting.** You are responsible for knowing and complying with any financial or disclosure standards and controls that impact your area. If you are involved in Nordstrom’s disclosure process, this includes taking necessary steps to ensure that all public filings or communications about Nordstrom’s financial and business condition are full, fair, accurate, timely, and understandable.

**Cooperating fully with auditors and regulators.** If you have to disclose information to internal or external auditors or regulatory authorities, make sure the information you provide is honest and complete.

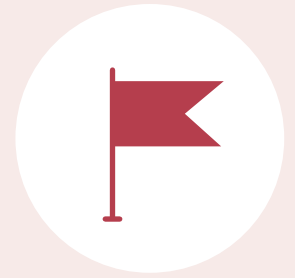
**Saving records as required under our Record Retention Policy.** You must make sure you save all records as required under our Record Retention policy. Once the retention period for a record is over, securely dispose of the information. You may be asked to “hold” certain records by the Legal department for longer than our standard retention schedule. In these instances, you must make sure these records are safely retained until the hold is released.

## What types of records do we need to keep?

**A record can be any type of information created or received while conducting Nordstrom business.** Typically, records subject to Nordstrom’s Record Retention Policy are stored at a Nordstrom worksite or on Nordstrom technology tools. If you have Nordstrom information stored at your home office or on a personal device (which should be rare) such information is also subject to the Record Retention Policy and may need to be retained. Work with your manager to understand what types of records your team creates and manages.

### What these records could look like:

- Purchase Orders
- Employee earnings records
- Timecards and electronic time records
- General ledgers
- Account receivable or payable invoices
- Shipping records
- Advertising copy, media packets, and presentations



## Red flags

Comments like these should give you pause. Stop and ask for help:

- Just make the numbers work.
- Don’t record that expense until next quarter when we have more budget.
- Clock me in so I don’t get in trouble for running late.

Information looks good on you.

Stay up to date on our policies.



[Records Retention Policy](#)

# Speak Responsibly

Communicating responsibly with our customers, employees, and external stakeholders maintains the trust those groups have in us.

Our reputation matters to us. We are committed to providing accurate and consistent information when speaking externally about Nordstrom. To help meet that commitment, any statements you make to external stakeholders must be truthful and transparent, and you must take care to communicate responsibly. Always refer inquires or questions from external parties to the appropriate resource so that Nordstrom can speak with one voice.

## Exercising good judgment means:

**Ensuring accuracy.** Everything we tell our external stakeholders—including customers, suppliers, and other business partners—must be truthful. Never mislead or omit important details when communicating with stakeholders. Always use pre-approved Credit or Loyalty program materials when talking to customers about our Credit Card and/or Loyalty programs.

**Being transparent.** We must also ensure we are transparent in our communications. If you are communicating about our products or services externally, especially on social media, clearly disclose that you work for Nordstrom and only use pre-approved marketing assets.

**Using social media responsibly.** We recognize that many employees use social media to connect with customers and share information about Nordstrom. When posting online, remember that the things you post may impact our workplace. Remember:

- If you are posting in your personal capacity, make sure you are clear that the opinions you are expressing are your own (not Nordstrom’s). Never post on Nordstrom’s behalf unless authorized to do so.
- Never post Nordstrom’s confidential information (including information about our customers, employees, or business).

- Respect brands, trademarks, and copyrights when posting.
- Never post discriminatory, harassing, threatening, or violent content.

**Helping Nordstrom speak with one voice.** Following our policies when speaking on behalf of Nordstrom helps ensure we are providing accurate and consistent information to external audiences. Refer inquiries to the appropriate resources. Also, remember:

- Never speak on Nordstrom’s behalf if you are not authorized to do so. This means you should not answer questions from the investment community, media, or market research organizations on behalf of Nordstrom without prior approval.
- Never lobby, or hire a third party to lobby, the government on Nordstrom’s behalf without approval from the Office of Ethics and Compliance. “Lobbying” includes seeking to influence the government or a governmental entity to take legislative or administrative action.
- Always refer inquiries directed to Nordstrom, its Officers or Board of Directors from any government entity to the Legal Department.

## Who can help with...

Request	Resource
Media Inquiries	Nordstrom Corporate Communications NordstromPr@nordstrom.com
Investor Inquiries	<a href="#">Investor Relations Contact Us</a>
Customer Inquiries	<a href="#">Nordstrom Customer Service</a>
Donation Requests	Nordstrom Cares <a href="mailto:giving@nordstrom.com">giving@nordstrom.com</a>
Speaking Engagement Requests	Nordstrom Corporate Communications NordstromPr@nordstrom.com
Inquiries to Nordstrom, its Officers, or Board of Directors from Government Entities	Legal Department <a href="mailto:legalsupport@nordstrom.com">legalsupport@nordstrom.com</a>
Questions regarding Lobbying	Office of Ethics and Compliance <a href="mailto:ethicsandcompliance@nordstrom.com">ethicsandcompliance@nordstrom.com</a>

Information looks good on you. Stay up to date on our policies.

[Fair Disclosure Policy](#)

[Guidelines for Endorsers](#)



# NORDSTROM



## Taking Care of Our Company and its People

# Respect One Another

We strive to create a place where every customer and employee is welcome, respected, appreciated, and able to be themselves. We do not tolerate discrimination, harassment, or retaliation.

One of our key values is to Extend Ourselves by treating each other with respect and kindness. We all play a part in creating an environment where everyone feels connected and valued, and able to do their best work. We all watch out for each other by treating others fairly and respectfully and reporting any behavior that is discriminatory, harassing, or retaliatory.

## Exercising good judgment means:

**Welcoming and fostering diversity within our workplace.** Value the unique backgrounds, perspectives, and ideas that each employee brings to Nordstrom. Create an environment where all employees feel welcome. Treat everyone—including customers and other employees—with dignity and respect.

**Never tolerating harassment.** Never engage in or contribute to any unwanted or unwelcome behavior that creates an intimidating, hostile or offensive work environment. Remember that harassment can take many forms and can be physical, verbal, visual or sexual in nature. Be aware that harassment can include making offensive jokes, sharing offensive material, using racial slurs, engaging in intimidating behavior or bullying, or making sexual jokes, comments, or requests.

**Never tolerating discrimination.** Everyone deserves an opportunity to succeed, regardless of their background. Nordstrom does not base its recruiting, hiring, training, promotion, or compensation decisions on personal/protected characteristics. Make sure you base all employment decisions on objective factors, such as an individual’s skills, qualifications, performance, and business needs.

**Speaking up.** If you see, experience, or suspect that someone is engaging in behavior that violates our commitment to creating a workplace free from discrimination and harassment, immediately report the situation to any of the reporting channels listed in [Speak Up and Report Concerns](#). All concerns will be investigated promptly, thoroughly, and as confidentially as possible, and Nordstrom will take any appropriate measures needed based on the results of the investigation. Remember that Nordstrom does not tolerate retaliation against anyone who reports or participates in an investigation regarding discrimination or harassment.

Nordstrom is committed to a workplace that is free from harassment or discrimination.



Nordstrom prohibits discrimination or harassment based on perceived or actual:

- Sex
- Race, national origin or ancestry
- Color
- Religion
- Age
- Marital status
- Pregnancy or nursing mother status
- Disability, medical condition or genetic information
- Sexual orientation
- Gender, gender identity or gender expression
- Military or veteran status
- Any other characteristic protected by law



**Remember it can still be harassment when:**

- It takes place by text, email or social media
- It takes place on or off Nordstrom property
- It happens on or off the clock
- It is committed by a supervisor or manager, coworker, customer, or vendor
- It is committed by someone of the same or opposite sex

## What should I do?



*I applied for a promotion and just learned that another, less-qualified employee was selected instead of me. I think I wasn't selected for the promotion because the hiring manager knows I am pregnant. What should I do?*

If you suspect you were discriminated against, you should speak up and report the situation to the Employee Contact Center or any leader. Nordstrom is committed to making all employment decisions based on objective criteria and does not discriminate against employees based on protected status, including the fact that they are pregnant.

## Should I say something?

*My manager keeps making offensive comments about the country where I was born. The comments really bother me. When I asked him to stop, he said he was just joking. Should I just let the situation go and not say anything?*

You should report the situation to the Employee Contact Center or any leader. If the comments are offensive to you or could be perceived as offensive by someone else, you should report them immediately.

## Information looks good on you.

Stay up to date on our policies.

[Anti-Discrimination & Anti-Harassment Policy](#) (which include state specific information)

[Anti-Retaliation Policy](#)

[EEO Statement](#)

[Accommodation Policy](#)

[Lactation Policy](#)

[Inclusive Communication Policy](#)



# Maintain a Safe and Healthy Workplace

We are committed to creating a safe environment for our employees, customers, vendors, and other third parties in our stores or buildings.

We expect everyone to do their part in helping us create a safe work environment. Always engage in safe work practices and look out for your fellow employees, our customers, and anyone else who visits our workplace. Remember, you must report all safety concerns that impact our workplace immediately. In all we do, safety must come first.

## Exercising good judgment means:

**Working safely.** Safety comes first. You must follow all safety policies and practices. It is never ok to cut corners, especially when it may put the safety of you or others at risk. Remember to talk to your manager if you have questions about the safety policies or practices that apply to your role.

**Reporting unsafe situations.** If you come across a situation or condition that might be unsafe, immediately report the issue to a leader. You must also report all work-related injuries and incidents promptly.

**Being sober.** Being under the influence of illegal drugs or alcohol can impair your ability to conduct yourself in a safe manner or can impact the safety of others. You are prohibited from being under the influence of alcohol or illegal drugs while you are at work. This includes being under the influence of marijuana/cannabis even if obtained legally, or under the influence of any over the counter or prescription medication that is obtained illegally or taken contrary to its prescribed dose or purpose. If you are under the influence (or perceived to be under the influence), Nordstrom may take disciplinary action, up to and including termination of your employment. Remember:

- Drug use, distribution, and possession is prohibited during work hours, on Nordstrom premises, or when representing Nordstrom.

- Alcohol consumption is prohibited during work hours, including during meal and rest periods.
- Smoking, vaping, or tobacco use on Nordstrom premises is prohibited except in designated smoking areas.

**Keeping violence out of our workplace.** We don't tolerate any violence, threat, or intimidating behavior against customers, employees, or third parties. Also, remember:

- You must report any non-work situation that could impact the safety of our workplace. This could include domestic abuse or relationship break-ups that could impact your safety or the safety of others in the workplace or the fact you are identified in a restraining or protection order.
- Weapons are not permitted on Nordstrom premises.
- If you see or suspect violent behavior or weapons, immediately notify the Employee Contact Center, Asset Protection, or any leader.
- In the event of an immediate threat, call 911 when it is safe to do so. Asset Protection should also be notified when it is safe.



## Ways we can maintain a safe workplace.

- Keep floors and stairs clear of slip/trip hazards and objects.
- Protect any spill until it is cleaned-up.
- Immediately report all hazards, such as defective equipment or electrical cords, broken furniture, or fixtures to a manager.
- Walk, don't run.
- If you can't see the other side of a door, push it open slowly.
- Never block emergency exits or aisles.
- Pay attention to all safety signs and warnings.
- Cords are important. Turn off a device's power before plugging or unplugging it. Do not pull a plug out by its cord – grasp the plug. Never plug extension cords into extension cords.

## Information looks good on you. Stay up to date on our policies.

[Injury and Illness Prevention Plan](#)

[Drug Free Workplace Policy](#)

[Violence in the Workplace Policy](#)





# Protect Our Assets

We take good care of Nordstrom assets, using them to drive our business both today and tomorrow.

Nordstrom assets come in all shapes and sizes: they can include physical assets and locations, technology, and confidential information. We expect employees to do their part in protecting our assets and locations.

## Exercising good judgment means:

### Protecting Nordstrom’s physical assets and locations.

We all play a role in protecting Nordstrom’s locations, as well as its physical assets which can include things such as merchandise and computers. Remember to:

- Follow all security procedures to help ensure our stores and other work locations are secure and safe.
- Use Nordstrom tools and technology for work purposes. You may also use some Nordstrom tools and technology for some limited personal uses.
- Take steps to prevent loss, damage, theft, or misuse of Nordstrom assets. If you leave Nordstrom, return all Nordstrom assets, including technology, and confidential information.

**Taking information security seriously.** We all play a role in preventing unauthorized access to our systems or data. You must follow all privacy and information security policies while using technology and devices. This includes:

- Not sharing your credentials (including passwords) with anyone (including other Nordstrom employees). Ensure all devices are password protected.
- Verifying that links, emails, text messages, attachments, or notifications are authentic and from an expected party before opening or clicking on them.
- Reporting any suspicious messages, behavior, or activity to the Nordstrom Security Operations Center (1-877-889-0588 or SecurityOperations@nordstrom.com).

**Protecting Nordstrom confidential information.** Nordstrom confidential information includes things such as customer lists and intellectual property. Never share confidential information with anyone outside Nordstrom, including when using third-party tools such as Artificial Intelligence software, unless you are authorized to do so.

### Managing Nordstrom expenses responsibly.

If you manage Nordstrom expenses, you are expected to understand and follow all associated policies and procedures. This includes reconciling charges or paying invoices on time and not using Nordstrom cards for personal expenses. Be honest and accurate in your expense reporting.

**Following the merchandise discount policy.** Nordstrom provides a merchandise discount as a benefit to our employees and their eligible dependents. Letting anyone else use your discount — or using the discount contrary to our policy — is considered fraud and creates a loss to Nordstrom. Make sure you understand and comply with our Merchandise Discount policy.



### Engaging customers in a digital world

When you engage with customers, you must use applications and programs approved by Nordstrom. For example, you may not use third-party affiliate links or messaging apps that have not been approved by Nordstrom. Additionally, customer contact information such as phone numbers or email addresses may only be stored in Personal Book once we’ve received the customer’s permission. You may not keep customer information on your personal phone or on a personal address book.

## No expectation of privacy



You should have no expectation of privacy while in certain areas of Nordstrom premises or when using Nordstrom technology and systems, including when using personal devices for work purposes such as to access work email.

- **Video monitoring and inspections.** Public areas of the store, employee-only areas, warehouses, and offices may be monitored for security and operational purposes. Employees should be aware that their actions, movements, and conversations may be recorded. Video cameras are not placed in areas where employees have a reasonable expectation of privacy such as private areas in restrooms, showers, lactation rooms, and dressing rooms. In addition, Nordstrom may inspect packages and handbags brought to work, lockers and personal belongings stored in them, and employee transaction histories..
- **Call monitoring and recording.** We have a practice of recording calls and conversations when employees use Nordstrom-provided communication devices in our service centers, contact centers, stores, and other locations.
- **Nordstrom devices and applications.** Nordstrom reserves the right to monitor, access, view, retain, and/or delete any data from any Nordstrom devices, programs or applications, or from any personal devices accessing Nordstrom data, programs, or information at any time with or without notice to you, as permitted by law.

## Information looks good on you.

Stay up to date on our policies.

[Use of Technology Policy](#)

[Merchandise Discount Policy](#)

[Email Expectations](#)

[Business Expense Policy](#)

[Use of AI Policy](#)



# Record All Time Worked

We pay for all time worked and support employees in taking their rest breaks and meal periods.

Whether you're working a shift on the salesfloor, sending text messages to customers from home, or fulfilling customer orders in the backroom, you're working on behalf of Nordstrom and should be paid for the time. To help us with that commitment, you are expected to record time honestly and accurately and to follow meal and rest break requirements.

## Exercising good judgment means:

**Recording your time honestly and accurately.** If you're an hourly or salary non-exempt employee, you must use Time Entry (or Workday if Time Entry is not available) every time you start or end a work shift, and when you take a meal break. You should not record time in which you were not working for Nordstrom.

**Not working off the clock.** Nordstrom prohibits employees from working without recording their time. You must record any time you work in Time Entry or Workday. If you end up working while clocked out, you must report the time you worked in Workday as soon as possible and preferably before the end of the current pay period.

**Working your scheduled shifts.** You're expected to work all scheduled shifts. If you're unable to work your scheduled shift or will be late, you must contact your manager.

**Taking your rest and meal breaks.** Nordstrom expects you to take your meal and rest breaks as scheduled. You are free to use your rest and meal breaks as you wish and are not expected to do any work during your breaks. You also must accurately record the time you spend on your meal periods.





**Reviewing your time and pay records.** Your time and pay records are always available in Workday, and you're responsible for reviewing and correcting your time each pay period. If you notice an issue or inaccuracy with your time or pay records (for example, that time was not recorded or there was an improper deduction from your pay), and you are unable to correct it in Workday, you should notify the Employee Contact Center immediately. It is ultimately your responsibility to make sure your time is correct so that you're paid accurately.

## What is considered "worked time"?

Nordstrom pays for any time you spend doing work on behalf of Nordstrom. This can include time during your shift or time spent outside your shift on work activities.



### Examples include:

-  Social selling activities and calling or emailing customers.
-  Required security screenings.
-  Turning on and booting up your computer to do work or accessing the Nordstrom network or systems.
-  Setting up, maintaining, and breaking down work equipment and work stations.

Please talk to your manager or the Employee Contact Center if you have any questions about whether the activities you are performing qualify as paid work time.



## Information looks good on you.

Stay up to date on our policies.

[Pay for All Time Worked Policy](#)

[Rest & Meal Period Policy](#)

[Mileage Reimbursement Policy](#)

[Travel Time Pay Policy](#)  
(Non-exempt employee)

[Sell and Non-Sell Hours Policy](#)  
(Nordstrom Stores)



# How Nordstrom Supports You and the Communities We Serve

# Supporting You and Our Communities

As a company, we believe the impact we have on our employees, customers, and communities extends well beyond our operations. When we think about the value we offer to the world, we know that it's critical to protect the environment, give back to the communities we serve, create safe and fair workplaces for the people who make our products, and provide our employees with the help and support they need.

## Supporting Our Employees

Whether you directly serve our customers or provide support behind the scenes, we have many programs and resources available to support you during your employment with Nordstrom, and we encourage you to use them. Refer to the resources below to learn more.

SUBJECT	RESOURCES
<b>General Human Resources Questions</b> Get HR support or ask questions on employment topics including about pay, hours worked, and accommodations.	<a href="#">MyNordstrom.com</a> <b>Employee Contact Center</b> Phone: 1.855.NORDYHR (667.3947) Online: <a href="#">mynordstrom.com &gt; AskHR</a>
<b>Career Information, Time Records, Training, and Payslips</b> View your personal information, take assigned and skills-based training, and update records including worked time, time away, or contact information.	<a href="#">Workday</a>
<b>Benefits and Paid Time Away</b> View information about benefit plan options, company benefits including Paid Sick Leave (PSL) and Paid Time Away (e.g., PTO, Jury Duty, and Bereavement).	<a href="#">MyNordstrom &gt; Pay, Benefits &amp; Absence</a> • Benefits Information including the Summary Plan Description (SPD) • Time Away Guidelines including PSL Overviews <a href="#">MyNordstrom &gt; Nordstrom Benefits Portal</a> Phone: 1.844.487.5595
<b>Leave of Absences</b> Information and planning materials for a leave of absence.	<a href="#">MyNordstrom &gt; Pay, Benefits &amp; Absence</a> • Leave information including planning a leave of absence through LeaveLogic • Requesting a leave of absence Workday>Absence>mySedgwick
<b>Employee Resource Groups (ERG)</b> Information and resources supporting Diversity, Equity, Inclusion & Belonging (DEIB) including access to employee resource groups.	<a href="#">One Community</a>
<b>Company Information</b> An employee digital hub for all things Nordstrom.	<a href="#">The Inside Thread</a>
<b>Company Policies</b> • Policies impacting you as an employee. • Additional resources to help managers support their teams.	<a href="#">MyNordstrom &gt; Company Policies &amp; Practices</a> <a href="#">Policy &amp; Compliance Resource Site</a> (Manager only)

## Supporting Our Communities

Our community efforts are focused in three main areas: human rights, environmental sustainability, and corporate philanthropy. More information about our work in these areas is available below:

- [Human Rights.](#)
- [Environmental Sustainability.](#)
- [Corporate Philanthropy.](#)



## Waivers of the Code

If you have questions about the Code of Conduct & Ethics, our policies, or need additional guidance, please reach out to [ethicsandcompliance@nordstrom.com](mailto:ethicsandcompliance@nordstrom.com). Waivers of a provision of this Code of Conduct & Ethics may require prior approval by the Board of Directors or the Corporate Governance and Nominating Committee of the Board. Any waiver granted to an executive officer that is required to be disclosed under applicable law will be promptly disclosed in accordance with applicable law and the requirements of the New York Stock Exchange.

# Policy and Resource Quick Guide

Below are some common topics about which you may want to learn more or have additional questions. Don't hesitate to reach out to the contact listed if you have questions. You can also always reach out to your leader or Human Resources partner for more support as well.

**Finally, remember that the Company policies for the topics listed below and other topics can always be found on [my.nordstrom.com](https://my.nordstrom.com) > [Company Policies & Practices](#).**



Remember to report potential misconduct or violations of the Code or company policies — **Speak Up and Report Concerns.**

TOPIC	KEY POLICIES/RESOURCES	CONTACT INFORMATION FOR ADDITIONAL QUESTIONS
Anti-Corruption & Anti-Bribery	<ul style="list-style-type: none"> <li>• <a href="#">Prevent Bribery</a></li> <li>• <a href="#">Anti-Corruption Policy</a></li> </ul>	<a href="mailto:ethicsandcompliance@nordstrom.com">ethicsandcompliance@nordstrom.com</a>
Anti-Harassment & Anti-Discrimination	<ul style="list-style-type: none"> <li>• <a href="#">Respect One Another</a></li> <li>• <a href="#">Anti-Discrimination &amp; Anti-Harassment Policy</a></li> <li>• <a href="#">Equal Employment Opportunity Policy</a></li> <li>• <a href="#">Anti-Retaliation Policy</a></li> </ul>	Employee Contact Center at 1.855.NORDYHR (667.3947)
Anti-Money Laundering	<ul style="list-style-type: none"> <li>• <a href="#">Prevent Money Laundering and Fraud</a></li> <li>• <a href="#">Anti-Money Laundering Policy</a></li> </ul>	<a href="mailto:ethicsandcompliance@nordstrom.com">ethicsandcompliance@nordstrom.com</a>
Antitrust	<ul style="list-style-type: none"> <li>• <a href="#">Compete Fairly</a></li> <li>• <a href="#">Antitrust Policy</a></li> </ul>	<a href="mailto:legalsupport@nordstrom.com">legalsupport@nordstrom.com</a>
Business expense Reimbursement	<ul style="list-style-type: none"> <li>• <a href="#">Business Expense Policy</a></li> <li>• <a href="#">Corporate Card Purchasing Policy</a></li> </ul>	Employee Contact Center at 1.855.NORDYHR (667.3947)
Conflicts of Interest	<ul style="list-style-type: none"> <li>• <a href="#">Avoid Conflicts of Interest</a></li> <li>• <a href="#">Conflicts of Interest Policy</a></li> </ul>	<a href="mailto:ethicsandcompliance@nordstrom.com">ethicsandcompliance@nordstrom.com</a>
Drug and Alcohol-Free Workplace	<ul style="list-style-type: none"> <li>• <a href="#">Maintain a Safe and Healthy Workplace</a></li> <li>• <a href="#">Drug Free Workplace Policy</a></li> </ul>	Employee Contact Center at 1.855.NORDYHR (667.3947)
Privacy and Information Security	<ul style="list-style-type: none"> <li>• <a href="#">Protect Personal Information</a></li> <li>• <a href="#">Protect Our Assets</a></li> <li>• <a href="#">Privacy Policy</a></li> <li>• <a href="#">Careers Privacy Policy</a></li> <li>• <a href="#">Personal Information Management Policy</a></li> <li>• <a href="#">Use of AI Policy</a></li> <li>• <a href="#">Email Expectations</a></li> <li>• <a href="#">Use of Technology Policy</a></li> </ul>	<a href="mailto:privacy@nordstrom.com">privacy@nordstrom.com</a>
Gifts	<ul style="list-style-type: none"> <li>• <a href="#">Accept Gifts Responsibly</a></li> <li>• <a href="#">Gifts &amp; Entertainment Policy</a></li> </ul>	<a href="mailto:ethicsandcompliance@nordstrom.com">ethicsandcompliance@nordstrom.com</a>
Insider Trading	<ul style="list-style-type: none"> <li>• <a href="#">Trade Securities Ethically</a></li> <li>• <a href="#">Insider Trading Policy</a></li> </ul>	<a href="mailto:corporatesecretary@nordstrom.com">corporatesecretary@nordstrom.com</a>
Record Retention	<ul style="list-style-type: none"> <li>• <a href="#">Maintain Accurate Records and Reporting</a></li> <li>• <a href="#">Records Retention Policy</a></li> </ul>	<a href="mailto:legalsupport@nordstrom.com">legalsupport@nordstrom.com</a>
Time and Pay Guidelines	<ul style="list-style-type: none"> <li>• <a href="#">Record All Time Worked</a></li> <li>• <a href="#">Pay for All Time Worked Policy</a></li> <li>• <a href="#">Rest &amp; Meal Period Policies</a></li> </ul>	Employee Contact Center at 1.855.NORDYHR (667.3947)
Vendor Misconduct and Third Parties Issues and Complaints	<ul style="list-style-type: none"> <li>• <a href="#">Select Ethical Business Partners</a></li> <li>• <a href="#">Partner Code of Conduct</a></li> <li>• <a href="#">Non-Merchandise Third Party Engagement Policy</a></li> </ul>	<a href="https://nordstrom.ethicspoint.com">nordstrom.ethicspoint.com</a>
Violence in the Workplace	<ul style="list-style-type: none"> <li>• <a href="#">Maintain a Safe and Healthy Workplace</a></li> <li>• <a href="#">Violence in the Workplace Policy</a></li> </ul>	Employee Contact Center at 1.855.NORDYHR (667.3947)
Workplace Relationships	<ul style="list-style-type: none"> <li>• <a href="#">Avoid Conflicts of Interest</a></li> <li>• <a href="#">Workplace Relationships Policy</a></li> </ul>	Employee Contact Center at 1.855.NORDYHR (667.3947)



# In Closing

Since we opened our doors, our goal has been very simple: to make every customer look and feel their best. We do this by operating with integrity, conducting our business in a legal and ethical way, and treating our customers, employees, and vendors fairly, each and every day.

As an employee of Nordstrom, we expect you use use good judgment and to comply with our Code of Conduct & Ethics and all policies. By upholding our expectations and staying true to our values, we can build relationships with our customers and each other that help us achieve the success and reputation we are known for today. Thank you.