

Code of
**BUSINESS CONDUCT
AND ETHICS**

Buckle 

*"This is not a job, it's a relationship.
We're wanting to build something together -
where you feel it and we feel it."*

- Dan Hirschfeld, Founder of Buckle

A MESSAGE FROM OUR CEO

Maintaining integrity throughout our business is crucial for making good decisions, working well together, and upholding our mission: *to create the most enjoyable shopping experience possible for our guests*. There are two key factors that help us live out this mission – people and product.

People

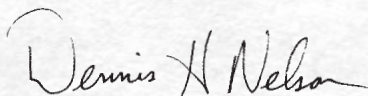
We strive to be a company that is firmly rooted in the passion we have for serving guests and for supporting the growth and development of our people.

Product

Though the product we carry has changed over time, the principles by which we operate have remained the same since our first day of business. We work hard to provide product of exceptional quality and desirable prices.

When we engage with each other, guests, vendors, and investors, honesty is always at the forefront of every conversation, relationship, and interaction. These relationships have remained through ever-changing trends, our growth, and the rise of the omnichannel experience. We believe this is because of our commitment to always work with integrity.

We hold ourselves to the highest standards in how we approach decision making, and we believe that making the right decision for the right reasons is what drives our character.



Dennis H. Nelson
President and Chief Executive Officer
The Buckle, Inc.

GET TO KNOW THE CODE

The Code of Business Conduct and Ethics (“Code”) reflects who we are and how we approach our business to create an environment where all teammates can be successful.

Our Code is made up of five principles:

We believe in treating people with dignity and respect.

Showing respect for every guest and teammate is essential for us to carry out our mission every day. Our teammates play an important part in our personalized service approach which is all about seeing each guest and teammate as their true selves.

We act with integrity.

Since the beginning, we’ve strived to provide styles that are both exceptional quality and desirable prices. We work with honesty and let our strong moral principles guide us through decision-making.

We comply with the law.

We’re subject to many local, state, and federal laws that we work hard to uphold and comply with. We follow the law simply because it’s the right thing to do. We strive to be a good corporate citizen in the communities we’re a part of.

We keep our people safe.

Every teammate deserves a safe work environment. A job isn’t worth doing unless it can be done safely.

We protect Buckle’s assets and information.

We’ve worked hard to develop tools that help us bring our mission to life. We treat these assets and information with respect by protecting them appropriately.

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We Believe in Treating People with Dignity and Respect

Personalized service is at the core of our mission. This means we approach each teammate and every situation with an open mind and curious attitude. When we value differences and embrace each other's true selves, we have the ability to thrive.

HOW WE TREAT EACH OTHER

We've all heard this simple phrase before – *treat others how you want to be treated*. Every teammate should be treated with dignity and respect. We are all responsible for creating a professional, positive, and inclusive workplace that gives everyone the opportunity to reach their full potential.

The way we act with each other should also carry over to interactions with guests, business vendors, mall management, government officials, and anyone else with whom we work. We must ensure everyone who interacts with us feels welcome and respected.

OUR STYLE:

- Showing up each day with a positive and inviting attitude.
- Treating guests and teammates with professionalism.
- Leading by example and performing at our highest level, including taking action on new and creative ideas.
- Exploring ways to foster diverse and inclusive teams.
- Celebrating teammate accomplishments and encouraging learning from all experiences.
- Promoting open and honest communication between teammates.
- Learning our teammates' strengths and developing strategies to enhance these strengths.
- Remembering that we are better together.

OUT OF STYLE:

- Making negative or destructive comments.
- Engaging in rude or inappropriate behavior with guests or teammates.
- Setting an example that encourages idleness or careless job performance.
- Ignoring, permitting, or supporting (whether by action or lack of action) any type of offensive, discriminatory, or intimidating behavior.
- Criticizing or focusing on misunderstandings and errors.
- Using confusing or passive aggressive language when giving directions or communicating with your team.
- Supporting actions or behaviors that isolate or discourage our teammates.
- Overlooking the accomplishments of teammates that contribute to the success of the team.

DIVERSITY & INCLUSION

Everyone has something to offer and something to learn. This is why we appreciate the unique characteristics, traits, perspectives, and experiences of all teammates and guests. We strive to create an environment where everyone feels welcomed, valued, supported, and respected. When we embrace diversity and create an inclusive workplace where everyone is celebrated for who they are, we promote growth in each other, our teams, and our business.

Our teammates and guests should know that they have a voice, are seen, are heard, and realize that they belong. Our approach to diversity and inclusion is built on collaboration and education. Continuing to create opportunities for constructive conversations and personal development is essential to Buckle's commitment to diversity and inclusion.

EQUAL EMPLOYMENT OPPORTUNITY

Buckle believes a commitment to diversity and inclusion means valuing every human being, no matter our differences. Equal employment opportunity has been, and will continue to be, a fundamental principle, where employment is based upon personal capabilities and qualifications without discrimination and/or retaliation because of:

- Veteran status or uniformed service member status
- Race or color
- Creed or religion
- Sex, sexual orientation, gender identity or expression
- Age (40 and over)
- Pregnancy (including childbirth, lactation, and related medical conditions)
- National origin, ancestry, or citizenship status
- Physical or mental disability and genetic information (including characteristics & testing)
- Any other protected characteristics that are established by applicable local, state, or federal law

This provides an environment where everyone can thrive. How you approach your work every day – with your unique skills, creativity, and open mind – will determine your level of success.

DISCRIMINATION, HARASSMENT, AND RETALIATION

Buckle is committed to creating a workplace that is free from harassment, discrimination, and retaliation based on any legally-recognized basis, including, but not limited to those previously listed in the Equal Employment Opportunity section of this Code.

Harassment, discrimination, or retaliation based on any legally-recognized basis will not be sanctioned or tolerated.

Buckle will never retaliate against a teammate who brings forward sincere concerns or provides information in an investigation. We expect teammates to handle concerns brought forward with professionalism and understanding. Retaliation against any teammate who reports a claim or provides information in an investigation is strictly prohibited.

OUR RELATIONSHIPS

One of the best parts about working at Buckle is the people and we know that during your time with us you will form many social and personal relationships with other Buckle teammates. Keep in mind that all relationships at work should be kept professional in order to avoid situations where your personal relationships with teammates could negatively affect your job performance or your ability to manage or work with others. We are all committed to fostering an honest, respectful, supportive, and professional work environment. Teammates in a romantic relationship with each other should use good judgment and be sensitive to others at work. Showing favoritism and open displays of affection are not appropriate in the workplace and could create a real, or perceived, conflict of interest. If you are related to or have a romantic relationship with another teammate, be sure to let your manager and Human Resources know so we can ensure potential conflict of interest situations can be avoided.

We are all committed to fostering an honest, respectful, supportive, and professional work environment.



We Act with Integrity

Integrity is the foundation to growing and succeeding together. We live our values and everything we do for our guests and each other is done with intention and purpose. Putting this into action means we:

- **Perform our jobs with honesty and transparency;**
- **Handle guest and teammate information carefully and confidentially;**
- **Maintain accurate records so that our business records truthfully reflect our financial performance; and**
- **Always treat everyone with kindness and respect.**

MAKING GOOD CHOICES

We are guided by principles of honesty, integrity, and respect. As a teammate, you are expected to act and conduct business with these values in mind, to lead by example, and to hold others accountable to this Code and its policies.

The answer to making the right decision may not always be clear. If you are unsure that you or someone else is making a good choice, think about these questions; they'll help you figure out the smart, ethical decision.

- **Is it the right thing to do?**
- **Is it legal?**
- **Does it comply with our Code of Business Conduct and Ethics?**
- **Am I authorized to do this? Did someone with authority give me permission?**
- **Would I want my fellow teammates to act the same way?**

If you answer “no” to any of these questions, please talk to your manager, Human Resources, or Legal for guidance before taking next steps.

We are guided by principles of honesty, integrity, and respect.

MAINTAINING ACCURATE BUSINESS RECORDS

Financial integrity plays an essential role in our core business values. All teammates are responsible for maintaining honest and accurate business records. Timesheets, budget records, and cash drawers are business records that must be correctly submitted, accounted for, and approved.

When working with any kind of financial information, you must ensure all information is complete, fair, accurate, timely, and easy to understand for disclosure and reporting purposes. All transactions must be recorded in accordance with Generally Accepted Accounting Principles and Buckle's own policies and procedures. If you become aware of any falsification or concealment of financial information, please talk to your manager, Human Resources, or the Internal Audit and Ethics Hotline (Lighthouse) at 1-844-630-0003 or www.lighthouse-services.com/buckle.

CONFLICTS OF INTEREST

We understand that you have a personal life outside of work and we believe it's important to maintain relationships with friends, family, and organizations that are important to you. Having a healthy balance between those personal interests and Buckle is essential for you to make ethical choices while working. Be sure to avoid conflict-of-interest situations that might interfere, or appear to interfere, with your ability to make decisions with an impartial perspective.

There may be times when gifts, personal relationships, or activities outside of work make it hard to make the right decision or skew your judgement. Be sure to avoid a situation that involves someone seeking a favor from you, or Buckle, for personal gain. You should always perform your job duties, including choosing vendors and hiring, based upon what Buckle needs rather than personal gain.

These “conflict of interest” situations should be avoided:

- Accepting tips, cash, or large discounts from guests or vendors
- Accepting excessive gifts or tickets to entertainment events
- Making business or hiring decisions based on your personal relationships or financial interests
- Using company equipment, materials, or other resources to promote an activity that is not work related
- Activities that interfere with your schedule or responsibilities at work
- Using your position or influence to benefit a third party

Even if you don't mean to cause harm, the appearance of a conflict of interest can hurt your and Buckle's reputation. If you're aware of something that could be a conflict of interest, or you simply have questions, please talk with your manager or contact Human Resources or Legal. When in doubt, ask before taking action.

QA *A guest offered me a cash tip for service in the store. Can I accept it?*

While we appreciate our guest's recognition of your hard work, you should not accept gratuities or tips. Instead, thank the guest for their offer and explain that we pride ourselves on always creating an enjoyable shopping experience and you're simply doing your job. You can also let them know that the highest compliment they can give you and Buckle is to return on a future day to shop with you again. Be sure to let your manager know about

the offer of a tip as soon as possible. If the guest continues to try to tip you, please ask your manager for assistance or advice.

QA ***One of our vendors gave me a gift. What should I do?***

This depends on the gift. If it's a seasonal or holiday gift, special occasion gift, promotional t-shirt, courtesy basket of perishable foods, or something else that is infrequent and of nominal value, you can accept the gift. However, if you receive a gift card or something of greater value, there could be a conflict of interest. Cash and gift cards must be approved by your manager. You may not accept a gift of \$100 or greater. If you receive a gift that you're unsure about, please talk to your manager before deciding to accept or decline the gift.

QA ***A vendor invited my team to dinner. Do I need approval to go?***

Going to business meals is acceptable if it reasonably follows typical business practice. Dinner or entertainment that is lavish or too frequent might be considered unacceptable. You should get your manager's written approval in an email before accepting a vendor's invitation for entertainment after a meal. Inappropriate entertainment and illegal activities are not allowed. Be responsible and safe during a business meal or outing with a vendor.

QA ***Do I need to get approval to work another part-time job with a different employer?***

Yes, you should talk to your manager about a potential part-time job. Second jobs can create new challenges for potential scheduling and relationships with your guests if they encounter you outside of Buckle. When considering a second job opportunity, consider how it could create the potential for conflict and/or interfere with your schedule and responsibilities. If approval is received, it will be monitored closely on a regular basis.

QA ***My family member applied at the store I manage. What should I do to make sure there isn't a conflict of interest?***

Since you would be directly supervising a family member if hired, let Human Resources know of your personal relationship. Human Resources will determine if there's a way to avoid the conflict and share with you the best way to proceed.

CORPORATE OPPORTUNITIES

Throughout your time with us, you may become aware of certain business opportunities that interest you. Because all ventures discovered through our work belong to Buckle, taking personal advantage of or misappropriating Buckle's property, information, or your position to gain an advantage for outside work is not appropriate. Additionally, do not share business opportunities that could benefit Buckle with outside individuals, businesses, or competitors, unless you have received written approval from our Executive Committee. Simply put, always keep Buckle's best interest as your number one priority.

HOW WE CONDUCT BUSINESS

We like to say that we're in the business of people – and that means we treat everyone (our guests and business partners) fairly with professionalism and integrity. We strive to provide quality styles and services to our guests, and to market our products and brands with honesty and fairness. We work with our vendors, suppliers, regulators, business partners, competitors, and others in good faith to ensure honest and fair dealings with them.

Our reputation for doing the right thing depends on our teammates. As a representative of Buckle, you should do your job in a manner that demonstrates Buckle's values and ethics. This means following all laws and regulations, acting with courtesy towards our competitors, and always speaking truthfully with our guests and business partners.

POLITICAL ACTIVITIES

Buckle encourages your participation in political activities that interest you; however, if you choose to engage in any personal political activities, those activities should be separate from your role at Buckle. Involvement by you in political activities must be on your own time and at your own expense, and you may not suggest that Buckle endorses your personal politics. You should also never use your position to pressure other Teammates to make political contributions or to support or oppose particular candidates.



We Comply with the Law

We believe that our success depends on each teammates' contributions. When you act with integrity, are accountable for your actions, follow the laws and regulations to which Buckle is subject, and defend this Code by speaking up if you see or suspect a violation, we all succeed.

ANTI-CORRUPTION AND BRIBERY

Keeping with our promise to act with integrity, we follow all local, state, and federal laws that apply to what we do – including the U.S. Foreign Corrupt Practices Act (“FCPA”). What does that mean for you? Simply put, we do not accept or offer bribes, kickbacks, or anything of value to any company, government, or individual. Doing so could result in serious legal consequences for Buckle and you, including placement on the Commitment to Success program.

QA *What’s a bribe?*

A bribe can be money or a favor that’s been offered, given, or promised to influence you or someone in a position of trust or authority.

QA *What’s a kickback?*

A kickback is an illegal payment (in the form of money, gifts, credit, or anything of value) you receive in secret at the same time or after an agreement or business opportunity moves forward.

As a publicly traded company, we must do our part to ensure our Code, as well as the FCPA, is never violated.

Please be sure to let someone in Legal know if you are aware of any of these potential red flags:

- Unusual payment methods such as cash or payment through a third-party agency
- Invoices with false or unclear information
- Unreasonably high fees or commission payments
- Questionable finance or accounting records
- Payments requested for routine governmental actions
- Requests for political or charitable contributions

QA *What is the FCPA?*

The FCPA tells us that we can’t provide anything of value to foreign government officials or political candidates in order to gain or keep their business. This includes direct and indirect offers or promises of payment.

ANTI-TRUST AND COMPETITION

We believe in fairness for everyone, which is why we do not take part in business practices that restrict competition and unfairly divide markets. This includes entering into agreements with competitors about issues of price, sales results, suppliers, market allocation, or any other sensitive information.

When talking with vendors, you should not discuss a competitor's pricing, terms and conditions, marketing plans, business strategies, and other sensitive data.

Simply stated, to keep competition fair we do not:

- Discuss sensitive information – ours or a third party's – with any competitor
- Enter into agreements with competitors regarding our business dealings with its vendors or suppliers
- Share our business partners' confidential information with their competitors
- Engage in manipulative bidding practices with any competitor or service provider
- Stray from the established agenda at trade or business association meetings to discuss confidential company information

If you have any questions about information you receive from a competitor or concerns about anti-trust and anti-competitive business practices, please reach out to our General Counsel. You can call the HR Helpline at 1-888-801-2814, or email humanresources@buckle.com. To file a confidential report, log in to www.lighthouse-services.com/buckle, or call 1-844-630-0003. Claims will be investigated, and appropriate action will be taken to correct the situation, stop the behavior, and/or prevent future offensive behavior.

COMMUNICATING WITH THE PUBLIC

We limit the number of people responsible for speaking on behalf of Buckle to a small group who have been authorized to do so. This ensures that all communication with outside parties is accurate, legal, and reflects our policies. If you have not been authorized, you may not speak on behalf of Buckle or imply that you are someone who represents Buckle in making such statements.

Questions or requests from investors or media sources regarding:

- Inquiries from stockholders or securities analysts, or requests for financial information, email buckle.investors@buckle.com
- Inquiries from media sources, email Legal@buckle.com
- All other inquiries, email Legal@buckle.com

If you plan to participate in a trade show, industry panel, or any similar event, or would like to provide information for articles, press releases, or other similar communications, you must submit your request to Legal for initial review. These requests are subject to final approval by the Executive Committee.

INSIDER TRADING AND SECURITIES TRADING

During your time here, you may become aware of confidential, material information.

QA *What is confidential material information?*

Confidential material information is anything dealing with forward-looking projections of financials – assets, margins, sales, stocks – proposed transactions, management changes, planned dividends, or anything else that could affect stock prices or an investor's decision about whether to buy or sell stock. As a good rule of thumb, data and financial performance information related to Buckle's performance during the most recent 90 days is defined as confidential, material information.

QA *What is insider trading?*

Insider trading happens when someone buys or sells stock based on their knowledge of confidential material information before it is made public. Insider trading is illegal under federal securities laws. All teammates are prohibited from being a part of insider trading in any way. You may not share confidential material information about Buckle or advise others to trade Buckle stock before the confidential material information has been made public.

After material information has been released to the public and is no longer confidential, you may buy or sell Buckle shares. However, short swing trade activity where you are both a buyer and a seller of Buckle stock in a six-month window is strictly forbidden.

If you are not sure about whether information can be shared, it is a good idea to be cautious and avoid talking about the topic entirely.

INTERNATIONAL TRADE

We comply with all laws and requirements related to the import of products into the United States. Teammates whose job responsibilities involve the import and export of goods are required to understand and follow all applicable laws, regulations, and procedures to ensure compliance with international trade regulations. If you work with our vendors and merchandise, you should also have a deep understanding of those laws and regulations, as well as accurate labeling, product descriptions, and customs documentation.

We are strictly forbidden from doing business with individuals or organizations subject to trade or other sanctions imposed by the United States or other countries.

If you have any questions about international trade issues, including import and export requirements, please contact Legal.

AUDITS AND INSPECTIONS

In order for us to comply with lawful audits and inspections, we require that all teammates fully cooperate with any internal or external audits, investigations, or inspections. In many cases, you'll need to contact the appropriate Department and refer the matter to them for next steps. You'll also need to preserve records and documents that may be related to investigations and provide complete and accurate information in a timely manner.

If you receive a written request for an audit or information request, please notify Legal by calling 1-800-626-1255 or emailing legal@buckle.com.

You should never:

- Destroy, alter, or withhold any records potentially related to an investigation
- Obstruct an investigation or audit process
- Attempt to coerce, manipulate, mislead, or deceive an auditor

If you become aware that someone may be falsifying records or hindering an investigation or audit, you should contact the Internal Audit and Ethics Hotline (Lighthouse) at 1-844-630-0003 or www.lighthouse-services.com/buckle.

FAIR DEALING

For us to truly live out our mission – to create the most enjoyable shopping experience possible for our guests – we must conduct our business honestly and in good faith with all guests, vendors, competitors, teammates, and anyone else with whom we work. We expect you to build strong relationships by acting ethically, with integrity, and always in the best interest of Buckle. You should never engage in unfair dealings, which includes taking advantage of anyone through manipulation, concealment, falsification, or abuse of material facts and information.

*For us to truly live out our mission,
we must conduct our business
honestly and in good faith.*



We Keep Our People Safe

We are committed to the safety and well-being of our teammates and guests. We have developed safety guidelines for our teammates to follow that align with health and safety regulations. Part of how we keep everyone safe is by acting professional when at work. We do not tolerate inappropriate behavior, threats of violence, or inappropriate statements or speech directed at other teammates or guests.

WORKPLACE HEALTH AND SAFETY

Teammates and guests are Buckle's most important assets. We show this commitment by providing a clean, healthy, and safe work environment for all teammates, guests, vendors, and visitors. From time to time, we may implement new or enhanced safety procedures. You are expected to follow all safety policies and procedures, as well as any applicable laws. If you know of or witness any accidents, injuries, hazardous conditions or behavior, let Human Resources know immediately so they can help.

NO DRUGS OR ALCOHOL

We are committed to maintaining a drug and alcohol-free environment. Drugs are not allowed – in any form or for any purpose – in our workplace. Selling, purchasing, or distributing personal prescription drugs on our properties or during work hours is strictly forbidden. No teammate may work or be on our premises while under the influence of any substance that impairs judgment or creates a hazard to the safety of themselves, others, or our property. Occasionally we may host a company event where alcohol is served to teammates of legal age. Teammates must always behave appropriately and being under the influence of alcohol will not make their actions forgivable if they violate this Code or policies.

NO VIOLENCE

Buckle does not tolerate any act or threat of physical violence, harassment, intimidation, coercion, or other hostile behavior that takes place at work or affects our teammates, Buckle, or our property. Depending on the severity of situation, violent acts or threats should be reported to your manager, Human Resources, or the police.

Please remember that violence, threats of violence, and intimidation may also happen outside of work. This could impact the workplace and affect the safety of our teammates and guests. You should report inappropriate behavior that could result in harm to teammates or guests to Human Resources.

NO FIREARMS OR WEAPONS

Possession of any type of firearm, weapon, explosive, or other potentially dangerous tool or substance is not allowed at our locations or at Company-sponsored events. Report any violence, threats of violence, intimidation, or other behavior that could harm teammates or guests. If you suspect there is an imminent threat, you should tell security or local authorities immediately.



We Protect Buckle's Assets and Information

We take pride in our brands and reputation, and expect everyone to respect and defend them by protecting all personal information about our guests and teammates from misuse, disclosure, and attacks.

SOCIAL MEDIA & RESPONSIBLE COMMUNICATIONS

Buckle's social media presence helps us promote our brands, identify new trends, and connect with our guests.

As a teammate, you are a brand ambassador in everything you do, including when you are on social media. We expect you to use good judgment when on social media, and to never share or discuss any confidential information about Buckle, other teammates, our guests, or business partners who trust us with their information. Only authorized teammates can speak on Buckle's behalf to the public.

PROTECTING COMPANY ASSETS

You should take care of Buckle's property the same way you take care of your own. While working, you should take measures to prevent:

- Loss
- Damage
- Unauthorized access
- Disclosure, misuse, waste, or theft of any asset

QA *What is a company asset?*

Company assets include facilities, equipment and devices, supplies, displays, inventory, samples, software, time, cash, and intellectual property.

Buckle assets are maintained and provided so you can do your job and serve our guests. Using those assets for personal reasons is not allowed. You are prohibited from misusing Buckle assets, equipment, and devices to access, receive, or transmit any offensive, disruptive, or inappropriate materials or engage in illegal activities. We reserve the right to monitor the use of Buckle's property (including computers, email, phones, and other electronic devices) in accordance with applicable law. Because Buckle's assets are meant to be used for our business purposes, teammates do not generally have any expectation of privacy when using them. If you know that another teammate may be misusing or stealing our property, please report it to your manager or Loss Prevention.

INTELLECTUAL PROPERTY

Buckle's intellectual property (IP) is an extremely valuable asset, and we must protect our brands, trademarks, logos, trade dress, copyrights, patents, and trade secrets. Generally, anything you develop or create using our resources or information belongs to Buckle. This could include things such as inventions, discoveries, ideas, improvements, software programs, artwork, and written works. You have an obligation to help Buckle protect this work and other IP assets by preparing and signing any documents needed to effectively defend Buckle's ownership of IP.

If you know about or see any of our trademarks on products, labels, hang tags, price tags, or packaging on pieces that are not from a company-owned store or website, you should contact Legal immediately. Only Buckle can approve the use of Buckle IP assets.

Because we know how important Buckle's IP is, we respect the rights of others to protect their own IP. Teammates and business partners are expected to respect those rights as well. You should never make unauthorized copies of materials from books, articles, videos, music recordings, websites, products, or computer programs. For Buckle's benefit, you should also ensure that all valid licenses are in place before using materials for Buckle that originate from a non-teammate or another organization or company. Use caution, and if you have any questions please reach out to Legal.

CONFIDENTIAL INFORMATION

During your time with Buckle, you may have access to confidential information about our company, teammates, guests, suppliers, and vendors. This confidential information is valuable, and we all have an obligation to protect and secure it. Always use equipment and electronic devices responsibly and protect Buckle's office and networks (including IDs, passwords, authentication, devices, pass codes, and building access key cards) from unauthorized access.

Confidential information can be written, electronic, or verbal and includes:

- Personal information, such as: name; age or date of birth; physical and email addresses; telephone numbers; government ID numbers or employee ID numbers; credit card or bank account information; demographic information, including race, gender, age, sexual orientation, religion, medical condition, and similar information; computer and mobile device identifiers, passwords, access codes, security codes, and PIN numbers; medical information, including health insurance information; and customer transaction or employment history.
- Unannounced product details or information like product designs, patterns, fabrications, fit, product lines/collections, labels, or pricing.
- Strategic or organizational plans; marketing and promotional plans; or potential joint ventures.
- Unannounced financial information and proprietary data.
- All other business information, including reference documents, guidebooks, or manuals.

A teammate should only have access to confidential information on a “need to know” basis. Each one of us must safeguard our information against inappropriate and unauthorized use – internally or externally. You are obligated to protect Buckle’s confidential information when you are a teammate and after employment has ended. Any materials in your possession that have confidential information must be returned on or before your last day.

In addition to Buckle’s assets, we also respect the rights of other companies and their need to protect their assets and confidential information. You should never take or use confidential information or materials from a previous employer or one of our competitors. Also, don’t share any assets containing confidential information with a vendor or supplier without the proper authorization and confidentiality agreements ahead of time.

OUR STYLE:

- Share information with teammates if they need it to do their job
- Understand the types of information that are given heightened protection by our policy and applicable laws (ex. personal information)
- Understand our policies and procedures for sharing confidential information
- Protect confidential information by appropriate means such as encryption or limited access
- Store confidential materials in a secure place
- Mark confidential documents as “confidential”
- Shred confidential documents when you no longer need them
- Always keep devices secure

OUT OF STYLE:

- Bring material from prior employers to Buckle
- Solicit confidential information from another company’s present or former employees or suppliers
- Leave documents out on your desk for a long period of time
- Leave computers unlocked
- Share passwords or access codes
- Click on questionable links or files
- Connect your device to an unknown network

SAFEGUARD PERSONAL INFORMATION

For Buckle to be honest and reliable, it is important that we keep the personal information of our guests and teammates safe and protected.

From time to time, you may have access to information such as:

- Names
- Addresses
- Phone numbers
- Email addresses
- Computer and mobile identifiers
- Government ID numbers
- Employee ID numbers
- Credit, debit, or bank account information
- Transaction history
- Employment history
- Medical information
- Demographic information such as:
 - Race
 - Gender
 - Age
 - Sexual orientation
 - Religion

You have a responsibility to act with integrity when working with personal information that Buckle has collected and to use it only for legitimate business needs. Handling someone's information with dishonesty or carelessness can impact relationships with guests or teammates, damage our reputation, or result in legal action. Use caution and limit how often you access personal information – only sharing it on a strict need-to-know basis and maintaining confidentiality according to our Information Security Program policies.

If you believe that a teammate has violated this Code, get in touch with your manager, Human Resources, or Legal for further help. You may also use our Internal Audit and Ethics Hotline (Lighthouse) at 1-844-630-0003 or visit www.lighthouse-services.com/buckle if you'd like to remain anonymous.

Buckle 

UPDATED 02/22