

# **CODE OF CONDUCT**

**macys inc**

To: Macy's, Inc. Colleagues

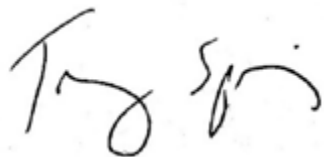
Dear Colleagues,

At Macy's, Inc., we live by our company values every day. And those values of **acceptance, respect, integrity and giving back** are part of our DNA.

Our Code of Conduct guides us and defines what it means to be a Macy's, Inc. colleague. This important document describes the laws and policies we have in place to ensure the highest standards of integrity, responsible behavior and ethical conduct across our business. It also provides direction on where to go with questions when issues arise and provides colleagues with the resources and tools needed to ensure we can support one another.

Familiarizing ourselves with this Code of Conduct is an imperative and should be used as a guide for our daily work and decision-making. Please speak with your People Leader if you have any questions or concerns.

Thank you for your commitment to our business and our company values.

A handwritten signature in black ink that reads "Tony Spring". The signature is written in a cursive, flowing style.

Tony Spring  
Chairman & CEO

**macys inc**

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## About This Code

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### Who is governed by this Code?

This code applies to all Macy's, Bloomingdale's and Bluemercury colleagues, whether working in stores, central offices, support organizations or elsewhere. When this Code refers to the 'company,' it means the group of entities where all such colleagues work. ALL colleagues at ALL levels (referred to as "we" or "us") are governed by this Code.

### What are our responsibilities as colleagues?

Each of us should:

- follow all company policies, including those discussed in this Code and in other materials distributed by the company, such as colleague and accounting policies,
- know that it is a fundamental principle that each of us seek to understand and comply with all laws that relate to our jobs,
- use our voice to speak up and raise concerns, ask questions when in doubt or report suspected violations of company policies, and
- make the necessary disclosures of any personal conflict of interest as described later in this Code.

### Do People Leaders have additional responsibilities?

Colleagues who are People Leaders are responsible for creating a culture in which all colleagues understand the company's commitment to conducting business legally and ethically, and following this Code and the company's policies. Above all, we must lead by example and create an open environment so colleagues feel comfortable raising concerns without fear of retaliation.

### Does this Code explain all of the standards and policies we need to know?

This Code is a starting point and provides general guidance. In addition, this Code references other company policies and provides guidance on who **must** READ, UNDERSTAND AND FOLLOW those policies.

Nothing in the Code or the policies it incorporates is intended, or will be applied, to prohibit employees from exercising their rights protected under federal labor law, including concerted discussion of wages, hours or other terms and conditions of employment. This Code is intended to comply with all federal, state and local laws, including but not limited to the Federal Trade Commission Endorsement Guidelines and the National Labor Relations Act, and will not be applied or enforced in a manner that violates such laws.

Although compliance with all applicable laws is a fundamental requirement of our company's policy, in certain instances, company policy goes above and beyond the legal requirements. This Code cannot and does not address every standard and policy we must follow, nor does it guide us through every situation we may face. Additional resources that give specific guidance are available from our People Leader, AskHR or the Law Department.

As a rule of thumb, when acting on behalf of our company, colleagues must ask themselves the following:

Is it legal?

Even if it is legal, does it comply with company policies?

Even if it is legal and consistent with company policies, is it the RIGHT THING TO DO?

Would it reflect well on our company if it appears on social media?

If the answer to any of the above questions is "No," or if our good judgment or this Code and other company policies do not provide an answer, we must promptly seek help through one of the many channels discussed below.

### Is it really necessary to speak up?

Yes, it is absolutely critical. By speaking up, you help protect our company, our colleagues, our company's customers and other stakeholders. The company is counting on each one of us to preserve and protect its image and reputation. A vital way you can do this is by expressing your concern if and when you suspect in good faith that a company policy has been violated.

- **Speak up and raise concerns early.** If you wait, it may get worse.
- **You can report anonymously.** However, if you identify yourself, the company may be able to follow up with you and provide feedback. If you choose to report anonymously, please give enough details so the company can investigate fully and accurately.
- **Confidentiality is respected to the maximum possible extent.** If you provide your name, your identity and report will be shared only as needed to look into and address the concern, or if required by law.
- **Retaliation is not tolerated.** Our company absolutely prohibits retaliation against anyone who uses his or her voice to report a potential violation that he or she reasonably believes has occurred or is likely to occur. Retaliation is grounds for discipline up to and including dismissal. If you believe you have been subjected to retaliation, report it promptly to AskHR or the Colleague Support Center (1-800-234-6229), the Office of Solutions InSTORE or through ComplianceConnections. (ComplianceConnections are telephone and online facilities we may use for this purpose. Details regarding ComplianceConnections are provided below.)

### If I report a possible violation, will I get in trouble if my concern turns out to be wrong?

No. You will not be punished or disciplined if you report a violation you believe has occurred or will occur. In fact, as company employees, we all have a duty to report suspected violations of company policy. We must, of course, have a reason for suspecting that a violation has occurred or will occur.

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Q: A colleague's sister told me the colleague was using her discount to buy a lot of china for her and that because of the discount, she was getting a lot more pieces than she would otherwise. Is that OK?

A: It is a violation of company policy for colleagues to use their discount to make a purchase for another person and get reimbursed for the cost of the purchase. Although it is okay to use our discount to buy gifts for family and friends, it is not okay to do so if we receive payment for such gifts. If you believe a policy has been violated, you should discuss your concern with your People Leader or report what you have observed, since you've seen enough to suggest that there may be a problem.

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Q: I reported the situation, but it turned out that the colleague was purchasing china from her sister's registry as a wedding gift. Am I going to get in trouble because it turned out to be nothing?

A: No. You did the right thing by raising a genuine concern. If anything happens that you feel could be retaliation, report that immediately.

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### Is it okay to not speak up and raise concerns when I am uncomfortable doing so?

No, it is not okay. Integrity means doing the right thing, even when it makes us uncomfortable. By doing or saying nothing about actions we honestly believe are in violation of any company policy, we are violating this Code and are subject to disciplinary action.

### **How should I use my voice to speak up?**

Our company tries hard to foster an environment of open and honest communications. Our company's "open door" policy gives you many options.

- Your People Leader – usually a good place to start.
- Your People Leader's Manager.
- Your store manager or the head of your department or location.
- AskHR or the Colleague Support Center (1-800-234-6229).
- The Office of Solutions InSTORE.
- ComplianceConnections (1-800-763-7290).
- Office of Compliance and Ethics ([officeofcompliance@macys.com](mailto:officeofcompliance@macys.com))
- The Law Department.

All of the above are collectively referred to as "Reporting Options" throughout the Code. Most issues can be resolved by direct conversations between the people involved. However, if you are unsure where to go for answers, uncomfortable raising issues with individuals within the company, or wish to report a potential violation of company policy anonymously, use ComplianceConnections.

### **What happens when I raise a concern via ComplianceConnections?**

ComplianceConnections is a toll-free telephone line that is answered by an operator, 24 hours a day / 7 days a week. To reach ComplianceConnections, call 1-800-763-7290 or online at [www.macyscomplianceconnections.com](http://www.macyscomplianceconnections.com).

If you contact ComplianceConnections by telephone to report suspected misconduct, a live operator from our third-party service provider will guide you through the process and create a report with the details provided. The operator will promptly forward the report to the company for follow-up.

If you access ComplianceConnections online, via [www.macyscomplianceconnections.com](http://www.macyscomplianceconnections.com), the report also will promptly be forwarded to company sources.

In each case, you will be told how feedback will be provided on your questions or concerns. In some situations, however, given the nature of the inquiry, the company or ComplianceConnections may not be able to provide feedback on the investigation.

The company will investigate concerns about compliance with company policies as follows:

- The issue will be assigned for investigation to colleagues who are skilled and objective.
- The investigators will gather information and determine facts. The investigation will be prompt and thorough, and confidentiality will be maintained to the maximum extent possible.
- The investigators may recommend corrective action, if necessary, to appropriate managers for implementation.
- Where appropriate, the colleague raising the concern will receive feedback on the outcome.

## Being Respectful ... Our Workplace

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One of our company's most valuable assets is its workforce. We strive to provide a work environment that is inclusive, respectful, safe and healthy – one that fosters wellbeing, energy and creativity. Each of us is responsible for ensuring that our actions and words build and maintain such an environment.

### Diversity and Equal Opportunity

#### What to Know

Our company embraces diversity and wants its workforce to be as diverse, inclusive and multifaceted as our customer base. Our company's goal is to offer all individuals equal opportunities.

#### What to Do

We must not discriminate against any person on the basis of race, ancestry, color, ethnicity, age, religion, sex (including pregnancy and pregnancy-related conditions), sexual orientation, gender, gender identity, gender expression, national origin, physical or mental disability, genetic information, military and veteran status, marital status, medical condition or any other attribute protected by law or unrelated to job performance.

Our company's commitment to diversity and equal opportunity applies to all aspects of our employment – this includes recruitment, hiring, placement, promotion, transfer, compensation, training, recreational and social programs and the use of company facilities.

We must, however, bear in mind that it is not harassment or discrimination for a People Leader to enforce job performance and standards of conduct equally without regard to any protected characteristics.

If we believe that discrimination has occurred, whether against us or someone else, we must raise our concerns.

All colleagues must use [this link](#) to access, read and understand our company's [EEO & Anti-Harassment Policy](#).

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Q: I consider myself a diverse colleague. My People Leader has passed me over several times for

a promotion. He gave the position each time to colleagues who I believe are lesser-qualified, non-diverse employees, whom I am then asked to train. I think this is discriminatory. What can I do?

A: Ask your People Leader why he/she hasn't selected you. If, you are uncomfortable discussing this with your People Leader, or you do not get a satisfactory answer, submit a case through AskHR, contact the Colleague Support Center or Solutions InSTORE, or raise your concern through ComplianceConnections.

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### Treatment of Co-workers

#### What to Know

We must treat co-workers as we would like them to treat us – with respect and dignity. There is zero tolerance for harassment of any kind – whether verbal, written, physical or sexual – or any form of workplace violence.

#### What to Do

We need to be sensitive and alert to the fact that harassment may take many forms. Sometimes conduct that is not intended to harass may be perceived as harassment by another person. We must avoid all such conduct.

Examples include:

- Making offensive or unwelcome remarks, jokes or gestures,
- Making unwelcome sexual advances, requesting sexual favors, making unwanted physical contact or comments, or distributing or displaying sexually explicit, racist or derogatory materials,

- Abusing physically or verbally, threatening, taunting or leering, or
- Treating colleagues or customers differently because of race, religion, sex or any other characteristic protected by law or company policy.

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Q: I am a female employee. A male co-worker frequently makes personal comments about my appearance that make me uncomfortable. I've asked him to stop, but he won't. What can I do about it?

A: Report this to your People Leader, submit a case through AskHR, contact the Colleague Support Center or Solutions InSTORE, or raise your concern through ComplianceConnections.

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## Accommodating Disabilities

The Americans with Disabilities Act and the Pregnant Workers Fairness Act both protect employees and applicants who have disabilities or pregnancy related conditions and requires that employers provide reasonable accommodations to enable performance of the essential functions of the job. People Leaders are responsible for recognizing when they are on notice of a disability or pregnancy related condition and escalating these issues to Colleague Support. The People Leader Policy Insight on Reasonable Accommodations can be found in AskHR under the Knowledge tab. In addition, People Leaders are encouraged to open an AskHR ticket if they have further questions regarding accommodations. Discrimination, harassment and/or retaliation against an individual with a disability is strictly prohibited. Creating accommodations on an ad hoc basis or eliminating essential functions of an employee's job without partnership with Colleague Support is strictly prohibited.

## Leave of Absence

If a People Leader becomes aware that a colleague needs time away from work, either continuously or intermittently, because of a medical issue, a family member's medical issue or any other issue that is not vacation or personal time, the People Leader has an obligation to escalate these issues to Colleague Support. People Leaders must never grant or deny a request for a leave of absence themselves.

We must also ensure that our company is in compliance with all laws governing employees with disabilities, pregnancy related conditions, and employee leaves of absence, including the Family and Medical Leave Act.

All colleagues must use [this link](#) to access, read and understand the form titled "[Employee Rights and Responsibilities under the Family and Medical Leave Act.](#)"

## Health and Safety

### What to Know

Our company strives to create workplaces that are safe, healthy and secure.

### What to Do

It is not possible to eliminate every hazard in the workplace, just as it is not possible to prevent all accidents at home. That said, we must do our best to avoid them by not creating hazardous conditions, monitoring our workplaces continually, taking safety training as directed (including training related to asbestos-containing material) and correcting or eliminating unsafe conditions, if they exist. In the event a colleague becomes injured or ill as a result of their job, we want them to receive prompt medical attention. All colleagues must promptly report any work-related accidents or illnesses to their People Leader.

We also must guard against violence in the workplace. We must not tolerate acts or threats of physical violence, including the unauthorized possession of a weapon in a company workplace. Each of us is responsible for reporting any violence or unsafe conditions that we may observe to a member of the management team or the senior manager on duty at your facility or location



To maintain a healthy and secure work environment, colleagues must not possess, consume, sell, purchase or distribute drugs or have open containers of alcohol in our workplaces, or engage in company business (whether or not in a company workplace), report to work or operate any company equipment or vehicle while under the influence of drugs or alcohol. Alcohol may be served at company-sponsored events, which is the only exception. Colleagues may take drugs that are prescribed by a licensed physician or are available over the counter. However, if a physician has prescribed medication that requires any accommodation or influences a colleague's ability to perform his or her job duties, the manager should be notified or a ticket should be opened in AskHR to discuss any reasonable accommodations that may be provided.

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Q: I have been asked to skip a routine inspection of a store's escalators, and instead help get the store ready for a major sales event. We rarely find a problem when we do this inspection, but it still does not seem right to skip it. I suggested rescheduling the inspection a few days later, but they want to skip it entirely.

A: Store management is not authorized to cut corners on safety matters. Immediately contact your People Leader, AskHR or report this through ComplianceConnections.

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## Lawful Employment Practices

### What to Know

Our company is committed to complying with all laws regulating employment practices, including but not limited to, pay rates, overtime, child labor, forced or involuntary labor, right to organize and collective bargaining, meal periods, rest breaks, occupational health and safety, accommodations and leaves of absence.

### What to Do

We must strive to properly categorize all colleagues as overtime exempt or non-exempt, and as employee or independent contractor, under employment and tax laws.

Those of us who record time worked, manage colleagues who record time, or otherwise have access to time records must ensure that time records accurately reflect all time periods worked. We must not work, or permit or require others to work, off the clock. For example, we must not

- fail to record work performed at home or any other offsite location,
- delete or conceal hours worked, including overtime hours, or move hours from one day and/or week to another to eliminate overtime,
- revise a correctly entered time record, or
- fail to take the required meal period and rest breaks, or permit or require others to do so.

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Q: I'm an hourly colleague. I've been busy lately, but my People Leader does not want me to work more than 40 hours each week. To get my work done, I've been working for a half hour after I clock out each evening. Because this benefits the company, have I done something wrong?

A: Yes. It is never OK to work off the clock. You must record accurately all time periods worked. If you feel that you are not able to complete your work in 40 hours, please discuss your concerns with your People Leader. If you are uncomfortable discussing this with your People Leader, or you do not get a satisfactory response, open a case through AskHR, contact the Colleague Support Center or Solutions InSTORE, or raise your concern through ComplianceConnections.

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## Being Loyal ... Conflicts of Interest

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A conflict of interest exists when a personal interest or activity interferes, appears to interfere or may interfere with your job duties or your duty of loyalty to the company. We owe it to our fellow colleagues, shareholders and other stakeholders to ensure that none of our activities at work or home harms our company's reputation or interests.

All business decisions should be made solely in the company's best interest, and not for any personal gain. Similarly, when conducting our personal affairs, we must avoid actions or situations that create, may create or reasonably appear to create conflicts with the company's interests.

Here are some common ways conflicts of interests could arise.

### Certain Relationships

#### What to Know

A conflict of interest may arise if a colleague or a colleague's family member has a relationship with a business partner or competitor of the company.

- A "business partner" is anyone who does or seeks to do business with the company. Examples are a supplier or purchaser of goods, services, equipment or real estate.
- A "competitor" is anyone at a national, regional or local level who sells merchandise that is the same as or similar to the merchandise we sell.

Examples of "relationships" that could present a conflict are below.

If one of us, or someone with whom we have a significant relationship (including relatives by blood, marriage or domestic partnership, individuals who share a household, or individuals who are in a dating relationship)

- (i) has a substantial amount of stock or other interest in a business partner or competitor,
- (ii) accepts an offer by a business partner or competitor to buy stock on terms not generally available to the public, or
- (iii) is an officer, director, employee, or consultant of a business partner or competitor.

#### What to Do

Not all relationships present a conflict of interest.

- **The questions we must ask are:**  
Could the relationship cause or influence me to make a decision that is not in the best interest of the company?  
Or, could it look to others as if the relationship is or could be influencing me?
- **Some investments are always wrong.** We must never personally invest in a business partner if we have any involvement in selecting or negotiating with the business partner or if we supervise anyone who has such responsibility.
- **We should carefully weigh a potential new relationship that could present a conflict of interest before entering into it.** Seek guidance and permission by contacting AskHR, who may consult with the Office of Compliance and Ethics.

**We should disclose to the company any potential conflict of interest (either when providing the annual conflict of interest sign-off or by promptly notifying the Office of Compliance and Ethics ([officeofcompliance@macys.com](mailto:officeofcompliance@macys.com)) after becoming aware of a conflict of interest).**

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Q: We need to hire a cleaning service for some stores. We could save our company a lot of time and effort by hiring my brother's cleaning firm. I would have control over them and could trust them to do the job right. And, they'll give us a special price. May I hire his company?

A: No. Hiring a firm owned or run by a family member is not a sound business practice and it violates our policies. It creates a conflict of interest between your desire to help your brother and your duty to select the most competitive supplier for our company. Even if you have nothing but our company's interests at heart, it may appear to others that you are being influenced by your relationship with your brother. However, if you make a full disclosure to your People Leader, make your disclosure to the Office of Compliance and Ethics, and remove yourself from the selection process (and no one who reports to you is involved), in certain situations, the company may permit your brother's firm to compete for the work with other bidders.

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## Gifts and Entertainment

### What to Know

We use sound business judgment when making business decisions, and we seek to treat all of our business partners fairly. Accepting a gift from or giving a gift to any business partner or competitor could create the expectation or appearance that they will be treated more favorably than others. It could also cause us to appear to be unfair and dishonest in our dealings.

Gifts or gratuities can take many forms – cash, merchandise, loans, gift cards, discounts, gratuities, services, transportation, use of vehicles or vacation homes, participation in stock offerings, tickets to sporting or other events or meal invitations. The potential list is endless.

### What to Do

Certain gifts and entertainment are permissible. Others are not. When receiving or offering gifts or entertainment, we must follow the company's guidelines strictly and seek help when we are unsure.

### Usually OK

#### Nominal Gifts

Gifts of "nominal" value (a combined retail value of \$200 or less) that are common courtesies in our business are usually okay to give or receive. When giving or receiving gifts of nominal value, remember these guidelines:

- The value of all gifts from a single source (including token gifts like pens or mugs) must not exceed \$200 in a calendar year, except for a company approved program, such as Macy's Style Crew;
- Gift baskets are to be shared with co-workers, if available;
- A colleague must have the corporate authority to incur the expense of giving gifts; and
- Gifts that fall in the "Always Wrong" category below may not be given or received.

If the above guidelines are followed, gifts of nominal value do not require disclosure or approval. If there is any question about a gift, contact the Office of Compliance and Ethics ([officeofcompliance@macys.com](mailto:officeofcompliance@macys.com)) for guidance.

### **Participation in Social Events with Business Partner**

Participating in a social event with a business partner is the one exception to the \$200 limit on gifts. We may participate in social events with business partners or vendors. Follow these simple guidelines:

- We may not accept invitations to multiple Social Events from a single business partner if the aggregate face value of all invitations is more than \$500 in a calendar year unless we obtain advance written authorization (electronically or otherwise) from the Office of Compliance and Ethics and the colleague's pyramid head. Clearance will be based on, among other factors, the business development value of the Social Event(s).
- We may not accept invitations to multiple Social Events from a single business partner if the aggregate face value of all invitations is more than \$500 in a calendar year, unless we obtain advance written authorization (electronically or otherwise) from the Office of Compliance and Ethics and the colleague's pyramid head. Clearance will be based on, among other factors, the business development value of the Social Event(s).
- Unless authorization is obtained as provided above, a colleague must pay the business partner for the aggregate face value of the Social Events to the extent it exceeds \$300.
- If there is uncertainty with regard to the dollar "value" or any other aspect of a Social Event, the colleague should contact the Office of Compliance and Ethics ([officeofcompliance@macys.com](mailto:officeofcompliance@macys.com)) for guidance.

### **Meals**

Meals with current or prospective business partners are separate and distinct from gifts and social events. We may participate as the guest or host in occasional meals with our business partners if:

- It is a common business courtesy in our industry,
- It is not too frequent, extravagant or excessive in value, and
- There is mutuality in the "give and take" such that we and our business partners have a chance to both treat and be treated.

If we include business partners in meals that we host, the expense should be classified as "Entertainment" in our reimbursement requests.

### **Vendor Paid Trips**

We may accept invitations to vendor sponsored events or meetings only in compliance with our company's Vendor Paid Trip Policy.

Colleagues who have been or are likely to be invited to participate in events or trips that are paid for, to any extent, by current or potential vendors or business partners, including all colleagues in buying organizations, must use this link to access, read and understand our company's [Vendor-Paid Trip Policy](#).

### **Contributions to Charitable Causes**

We may solicit contributions from our business partners to charitable causes ONLY in compliance with our company's Policy on Vendor Solicitations. This policy may be found in the Policy Center on the MyMacy's Portal.

## Bribes and Anti-Corruption

At the extreme end of conflicts of interest are bribery and corruption, which involve offering value with the intent of illegally or unethically influencing behavior. Bribes often involve government officials. All colleagues and all third parties acting on the company's behalf are strictly prohibited from offering, giving, or receiving a bribe under any circumstances. This applies to every colleague and their family members. A bribe isn't just a cash payment – bribes can include gifts, discounts, charitable contributions, travel, excessive meals, lavish entertainment or payments for "consulting". And bribery is also against the law, most notably under the Foreign Corrupt Practices Act, which involves foreign government officials.

It is imperative that we abide by the company's Anti-Corruption Policy and make sure we are following the guidelines of the Gift and Entertainment and Vendor Paid Travel Policies as well. The company's Anti-Corruption Policy is located in AskHR under the Knowledge tab. If you have any questions or concerns, you should contact the Office of Compliance & Ethics ([officeofcompliance@macys.com](mailto:officeofcompliance@macys.com)).

### Always Wrong

Some types of gifts and entertainment are **NEVER** permissible:

- Accept or give any gift or entertainment that is or could be illegal.
- Accept or give a gift of cash or cash equivalent (such as a check, money order or a gift card that is convertible to cash), loans, stock or stock options.
- Participate in any entertainment that is inappropriate, sexually oriented or otherwise violates our policy of mutual respect.
- Participate in any activity or accept or give any gift that you know would cause the person giving or accepting the gift or entertainment to violate his or her own employer's policies.

### Always Ask

It may not always be clear to us whether certain gifts and entertainment are permissible. In such situations, we must not proceed without obtaining the written approval of the Office of Compliance and Ethics.

When approval is requested, the Office of Compliance and Ethics will consider the following:

- whether the gift or entertainment would be likely to influence your objectivity,
- whether there is a valid business reason to attend the event,
- whether we would be setting a precedent by accepting or giving the gift or attending the event, and
- whether it could reasonably create a negative impression in the minds of our co-workers or outsiders.

### Gifts and Entertainment Examples to Consider

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Q: The sales representative for a business partner has offered me tickets to a baseball game. Can I accept them?

A: Possibly. If the sales representative is inviting you to attend the game with him/her, this may constitute a business function and may be appropriate. If the face value of the ticket is unclear or is above \$300, follow the guidelines provided above for attending Social Events with a business partner. If the sales representative is not attending the game, then the tickets would be considered a gift and are subject to the \$200 limitation.

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Remember – always review the Vendor Paid Trip Policy before a vendor pays for any part of a trip and ask the Office of Compliance and Ethics ([officeofcompliance@macys.com](mailto:officeofcompliance@macys.com)) if you have any questions or concerns.

## Fraternization

### What to Know

While all of us have the right to associate freely and pursue personal relationships with our colleagues, a romantic, intimate, financial or similar relationship in the workplace may create an uncomfortable work environment for others. It may also create a conflict of interest or the appearance of a conflict of interest if a People Leader has such a personal relationship with a colleague who reports, directly or indirectly, to that People Leader.

### What to Do

Colleagues in such relationships must use tact and good judgment. If you have a relationship with a direct or indirect subordinate or a direct or indirect People Leader, or with an employee, officer, owner, or director of a current or potential business partner, you must promptly disclose the relationship by contacting the Office of Compliance (officeofcompliance@macys.com), or the other Reporting Options (as noted on page 6) to determine if some action is needed. For more information on fraternization, review AskHR Knowledge for the Fraternization and Employment of Relatives Policy.

## Other Employment

### What to Know

While a conflict of interest generally exists if a colleague works for or receives compensation for services from any competitor or current or potential business partner of the company, there are certain exceptions.

Most hourly colleagues in our stores and central/support organizations are allowed to work for competitors while employed by the company. Commission Colleagues may work for another employer provided that the other employment does not involve selling merchandise in the same family of business and does not compete with their current commission-based job at Macy's, Inc.; for example, a Big-Ticket colleague may not work for another furniture, rug, or mattress retailer as a commissioned or non-commissioned employee. Authorized participation in a company approved program, such as Macy's Style Crew, is permitted.

Generally, People Leaders, Executives, Human Resources colleagues and Asset Protection colleagues may not work for competitors while employed by the company.

### What to Do

The company may conduct an individual review of the circumstances relating to other employment before making a final determination. All questions or concerns about other employment should be discussed with any of the Reporting Options (as noted on page 6). For more information on other employment, review AskHR Knowledge for the Other Employment Guidance.

In addition, you may not serve on the board or as an officer of another for-profit company, even if it is not a competitor or business partner, without first getting the approval of the Chief Legal Officer of the company.

All of us are encouraged to serve as a director, trustee or officer of non-profit organizations in our individual capacities, but you must obtain the approval from the Office of Compliance and Ethics before doing so as a representative of the company.

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Q: I am a commission cosmetics colleague and would like to make some extra money. I want to get a second job. Is this okay?

A: A second job may be fine, depending on your responsibilities in the other job. For example, a commission cosmetics colleague may work as a cashier or may sell shoes for another employer, but may not sell beauty-related merchandise for any other employer. Also, you may not work for a current or potential business partner of the company. Finally, there may be a conflict of interest if your second job adversely affects your attendance or job performance for the company. You should discuss any potential other employment with your People Leader.

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## Being Honest ... Company Assets and Information

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Our company's assets must be used, purchased or disposed of only for the company's benefit. We are all obligated to protect the assets of the company and use them appropriately.

In addition to merchandise, equipment, and other property, our company's assets include company information, the personal information of the company's colleagues and customers, any work product developed in the course of your employment, and any business or financial opportunity that the company could take advantage of.

### Company Data and Confidentiality

#### What to Know

Data is a critical corporate asset. We use data every day to drive value. As a company, we must ensure our data quality, protect our sensitive data, and collect, maintain and use data responsibly in a manner consistent with the law and our brand values. Failure to handle and protect our data responsibly creates significant risks for the company, such as loss of customer trust, risk of lawsuits and adverse regulatory actions.

All of the company's data is considered "confidential." This could include business or marketing plans, pricing strategies, financial performance before public disclosure, pending negotiations with business partners, documents that show any individual's personal data (colleagues, customers, vendors or otherwise), social security numbers or customer credit card numbers – in short, information, that if known outside the company, could harm the company or its business partners, customers or colleagues or allow someone to improperly benefit from having this information before it is publicly known. This data can be used only to pursue the company's business interests or in compliance with law or other obligations.

#### What to Do

All data should be collected, used, maintained, stored, transferred, retained and destroyed in accordance with Macy's, Inc. Data Handling Protection Policy (DHPP), the Data Security Policy, and the Records Management Policy. These policies can be accessed via the MyMacy's Portal under Tools and Resources/Information Security & Governance/Governance/Risk/Compliance/Information Security Library.

The DHPP explains:

- How the company classifies data according to the level of data sensitivity;
- The basic rules governing each class of data; and,
- The requirements on how to handle company data, such as saving files on company public drives.

In performing our duties, we may have access to company data relating to the business or our customers, partners or colleagues. We are all trusted to maintain the confidentiality of such company data, whether verbal, written or electronic, and to ensure that this data is not disclosed except as specifically authorized.

Here are some simple rules to follow:

Company data should:

- Follow the "clean desk" standard, ensuring confidential information is not left out and is stored in locked file cabinets or drawers when you leave your work area,
- Be clearly marked as "confidential" or following the Attorney-Client Privilege standards, where appropriate,
- Be shared only with those who need to see it for legitimate company business purposes,
- Not be sent to unattended fax machines or printers,

- Not be emailed without password protecting or encrypting attached files containing sensitive data,
- Not be discussed where others may hear, and
- Be properly disposed of according to the company's Shred All Policy. For paper, this means shredding. For electronic files, this means proper purging techniques must be used.

Always respect the confidentiality of third parties' information. We must not use or disclose any of it except as authorized under a written agreement approved by our Law Department.

Nothing in the Code or the policies it incorporates, is intended, or will be applied, to prohibit colleagues from exercising their rights protected under federal labor laws, including concerted discussion of wages, hours or other terms and conditions of employment. This Code is intended to comply with all federal, state and local laws, including but not limited to, the Federal Trade Commission Endorsement Guidelines and the National Labor Relations Act, and will not be applied or enforced in manner that violates such laws.

In addition, we must follow all policies and measures adopted by the company for the protection of such data from unauthorized use, disclosure or access. If any of us becomes aware of any instance of data being accessed or used in an unauthorized manner, we must report it immediately to the Enterprise Information Security Team and/or the Law Department.

[All colleagues must use this link to access, read and understand our Policy Regarding Confidentiality and Acceptable Use of Company Systems, as well as, our company's Colleague Data Security Policy.](#)

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Q: I am a RTW buyer. My vendor representative asked me for information about our customers and further asked if the vendor could put out forms in our stores asking customers to join the vendor's email list. Is this OK?

A: No. We generally don't share customer information with our vendors or let them collect customer information themselves in our stores. If you get such a request, inform your Divisional Vice President, who will contact the Law Department for guidance.

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Q: I am the manager of the menswear department in a high volume store in New York. One of my successful sales colleagues asked if he could write down the credit card numbers for certain clients in a personal notebook for quick reference. These clients rely on him to ring up merchandise because they are too busy to come into the store. I am concerned that if I do not permit the colleague to do this, we will lose valuable sales.

A: The company recognizes the value of such client relations and customer service. However, the company has strict guidelines on the protection and use of customer information. It is against our Shred All Policy to write customer information down on a piece of paper and subsequently throw it in the trash as this is an insecure collection and destruction method. In addition, credit card information must never be stored on paper, or in any system other than those company systems specifically used for that purpose. Our company has provided both tools and guidance to our sales colleagues to help them to continue providing excellent service to their customers, while at the same time protecting their customers' personal data. You must immediately consult the policies that govern you and your colleagues and seek help from the Law Department to understand Data Handling Protection Policy to understand what is permissible and what is not.



## Consumer Data Privacy Laws

### What to Know

State data privacy laws such as the California Consumer Privacy Act are in effect. These laws provide customers and colleagues with rights to:

- Know the Personal Information (PI) that the company collects or holds;
- Say no to certain data shares or sales of PI data;
- Request access, correction or deletion of certain PI;
- Opt-out of certain types of advertising.
- Opt out of having PI data used for Artificial Intelligence; and
- Opt out of having Sensitive Data processed.

Neither a colleague or customer can be discriminated against for exercising these rights. There are significant penalties for an organization's failure to honor these rights. Each colleague has a role in ensuring the company meets our data privacy law obligations.

### What to Do

Any colleague that handles customer or colleague data should understand the following. If you are responsible for any system containing customer or colleague data you must:

- Know what PI is in the systems, including your PCs and collaboration platforms.
- Know the type and sensitivity level of data according to the Data Classification Table.
- Ensure the correct opt out tables are being read to exclude consumers who have exercised these rights.
- Follow the Macy's, Inc. Data Handling & Protection Policy (DHPS).
- Complete a Risk Assessment before collecting customer or colleague data or sharing data with any 3rd party. For more information on Risk Assessments, see the Macy's, Inc. Risk Assessment Process on the Macy's, Inc. portal or contact [riskassessments@macys.com](mailto:riskassessments@macys.com).
- Limit data collection and usage to what is necessary and approved through a Risk Assessment or policy exception.
- Dispose of data in the approved manner per company Records Management Policy and DHPS.

Contact [privacy.master@macys.com](mailto:privacy.master@macys.com), [privacy.master@bloomingdales.com](mailto:privacy.master@bloomingdales.com) or [privacymaster@bluemercury.com](mailto:privacymaster@bluemercury.com) if you have any questions or concerns about consumer data privacy

### Responding to Customers about Privacy

If you are asked about customer privacy rights, refer them to the Notices of Privacy Practices available on our websites.

## Insider Trading

### What to Know

As colleagues, we may from time to time become aware of “material inside information.” Colleagues must take care to avoid using “material inside information” for their own gain or to enable others to gain from it.

“Material inside information” generally means significant and confidential information about the company’s business (which may include information relating to its business partners) that has not been disclosed to the public.

Examples of material inside information include information not yet announced to the public relating to earnings and financial performance, business deals or plans, a change in the dividend, a stock split, a merger or acquisition, disposition or consolidation, changes in directors or senior People Leader officers and changes in control, as well as unfavorable events such as a significant cybersecurity incident or breach. Information is considered to be “inside” or “nonpublic” information until it has been fully disclosed to the public, such as, for example, through public filings with the SEC or issuance of company press releases.

### What to Do

We may not buy or sell (including through the exercise of stock options) any stock or other security (such as warrants, debentures, puts or calls), whether of the company or another entity, on the basis of material inside information. Nor may we disclose such information improperly, either intentionally or inadvertently, whether during business hours or in informal, after-hours discussions.

Trading in company stock (or in the stock of any other company) on the basis of material inside information could result in civil and criminal penalties against the person executing the trade and/or the person who provided the information to the person who traded. In addition, it would subject the company to embarrassment and potential liability.

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Q: My wife told our neighbor that I was working late on an important acquisition. A week later we announced the purchase of a major business and our company’s stock price rose substantially. I learned later that my neighbor bought our company stock before the public disclosure of the acquisition. I never had any conversation with this neighbor directly. Have I violated our company policy?

A: Yes. By telling your wife, who then told your neighbor, about the assignment you were working on, you indirectly tipped your neighbor. Our company takes a very serious view of such violation. So do the federal and state authorities. You should discuss the situation with the Law Department promptly.

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## Information Disclosure and External Communications

### What to Know

Securities laws and stock exchange regulations specify when, how and to whom our company should disclose material inside information.

In order to comply with these regulations, our company has strict guidelines for the release of material inside information to the public. Additionally, only a few colleagues are specially authorized to discuss any company information with the media or the investment community.

### What to Do

We must follow all company policies governing the public disclosure of material information about the company. Further, we must not

- discuss our company or its affairs with the media, investors, financial or industry analysts, outside consultants, on social media or in public forums, or
- use company information in presentations to external audiences, such as college groups and industry conferences,

without obtaining specific approval from our Corporate Communications Department, Investor Relations Department or Law Department, as applicable. Refer to the External Communications Policy (Media Participation and External Speaking) in AskHR under the Knowledge tab for more information on the approval process.

## Business or Financial Opportunities

### What to Know

As colleagues, we may discover during our employment a business opportunity that the company may be interested in. All such opportunities belong to the company and may not be diverted away for personal gain.

### What to Do

If we know or could reasonably anticipate that the company would have an interest in pursuing a business or financial opportunity, we should not try to take advantage of that opportunity for ourselves or divert it to any other party.

## Protection and Use of Company Assets

### What to Know

Company assets belong to the company. We must protect them and use them only for company business.

Colleagues must not use merchandise, intellectual property, data, supplies, samples, software, equipment, fixtures and other assets of the company for personal benefit.

Company computers, for example, are intended for company business use. Only limited personal use is allowed. A colleague's use of company equipment, Internet access or email or voice mail systems is not private. The company reserves the right to monitor our use, consistent with applicable laws.

Theft, fraud, carelessness and waste directly affect our reputation and profitability.

### What to Do

We should all protect company assets by guarding against and reporting not only any suspicion we may have of theft or fraud, but also any waste or misuse we may observe.

We must not copy or inappropriately use software licensed to our company, download unauthorized software onto our Company computers, or use our company's trademarks or copyrights except as authorized by company policy.

Similarly, we should not use company assets, including merchandise or funds, for illegal, unethical or otherwise improper purposes. For example, we must not seek to advance the company's business with any governmental authority through bribes or payments to any third party.

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Q: Is it okay to take home samples or defective merchandise?

A: No. It is not ok, unless it is purchased in a company-sponsored sample sale.

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Q: I sometimes email my spouse to make personal plans, such as who will take the kids to their after-school activities. Am I allowed to use the company's computer for this?

A: Yes, as long as personal use is reasonable and does not interfere with your work.

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## Accuracy and Protection of Company Records

### What to Know

Our company's books and records must be clear and accurate, and must fairly reflect our company's business transactions and assets. They form the basis on which we make the required financial disclosure and other public statements about our business, financial condition and results of operations. All such public disclosures must be full, fair, accurate, timely and understandable.

We maintain a comprehensive system of internal accounting practices and controls to help us meet our objective.

In addition, all company records, in whatever format or media they exist, must be retained in accordance with the policies contained in the company's Records Management Policy.

### What to Do

All company accounting policies and internal controls must be followed. Some of these internal controls govern who may sign contracts that bind our company and who has authority to incur expenses on behalf of the company and to what limits. We must follow these controls strictly. Please refer to the Corporate Contracts Procedure found on the Legal page on the MyMacy's Portal for contract signing authority levels.

Additionally, we all must cooperate fully with our internal and external auditors. We may not, directly or indirectly, take any action to coerce, mislead or fraudulently influence any accountant or auditor engaged in an audit or review of our company's records or procedures.

### There is no tolerance for any deviation from this policy

If any of us becomes aware of any such wrongful behavior, or inaccurate recording or improper reporting of the company's information, we should promptly report these matters to our People Leader. If we believe in good faith that any such actions are sanctioned by our People Leader, it should be reported to an applicable Reporting Option.

In addition, if we become aware that the procedures for collecting and reporting information have not been strictly followed, or are flawed, we should similarly report that fact, even if that failure has not resulted in any inaccurate public disclosure.

If any of us has questions about accounting, internal accounting controls or auditing matters, we may submit them to the Audit Committee of the Board (which you may do anonymously and confidentially) by sending an email to [directors@macys.com](mailto:directors@macys.com). The Audit Committee will consider and act upon any questions and concerns regarding accounting, internal accounting controls or auditing matters submitted to the Audit Committee.

All company records must be retained for the periods specified in the company's Records Management Policy, which can be accessed via the MyMacy's Portal under Tools and Resources/Information Security & Governance/Governance/Risk/Compliance/Information Security Library.

Further, if we are told or otherwise become aware that certain records, whether in paper, electronic or other form, may be relevant to pending or anticipated legal action, we must retain them and must consult with the Law Department on their disposition.

## Being Responsible ... Legal Compliance and Social Responsibilities

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Our company is committed to conducting its business in full compliance with all applicable laws. We must avoid not only any action that is clearly illegal, but also any action that may be technically legal, but is inconsistent with our core principle of “Integrity.”

Our company also embraces its social responsibilities and seeks to support and enrich every community in which we work and live.

### Being Responsible... Legal Compliance

It is not possible to cover all the laws that govern our business. However, certain laws apply to our jobs, and we must become familiar with them. Where it is unclear if a particular action would violate applicable laws or our policies, ASK the Law Department. The sections below discuss a few principal laws that apply to our business.

#### Antitrust

##### What to Know

Antitrust laws are intended to promote vigorous competition. They prohibit agreements that seek to limit or restrain trade.

Our company is firmly committed to competing fairly and ethically. We believe that a free market economy is in the best interest of both our customers and our company.

##### What to Do

We may not enter into or try to enter into agreements, understandings or communications with competitors, whether written or unwritten and whether directly or indirectly, on matters such as prices, markups, markdowns, or any other terms or conditions on which we do business. Such an attempt would not only violate the law but is also a bad business practice.

We must scrupulously avoid every situation, meeting, communication or conversation, that could be construed as involving an attempt to reach such an agreement.

Agreements with vendors regarding the prices at which we will sell that vendor’s merchandise are prohibited. This includes agreements about sale events, markdowns or clearance prices, as well as the dates on which those prices will go into effect. We also cannot try to get a vendor to agree to stop selling or not sell an item to a competitor, though we can try to negotiate exclusives.

It is permissible to discuss markdown support, but we may not agree to sell an item at a certain price in exchange for a markdown allowance. We can only agree that we won’t get our markdown support if we choose to price differently.

While it is not practical to discuss here all of the “Do’s and Don’ts” under Antitrust laws, the following are helpful guides.

- Do compete vigorously, but ETHICALLY,
- Do not make agreements with respect to pricing with any business partner (vendor),
- Do not discuss **any competitor’s** pricing, clearance or markdown practices with a business partner,
- Do not engage in activity with a vendor or competitor that seeks to limit the vendor’s product distribution practices or control market prices, although asking for an exclusive on a newly introduced item is permissible,
- Do not induce a business partner to breach an existing agreement it has with a third party,
- Do inform all current and potential business partners of our company’s commitment to maintaining the highest ethical standards as it competes vigorously to provide the best products at the best prices for its customers.

All merchants and planners must seek to understand and comply with our company's Antitrust Guidelines.

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**Q:** I am friends with some buyers of one of our competitors. When I see them at trade shows, conferences or other events we often end up having lunch or dinner. We talk about industry trends, other retailers and other general topics. Is this a problem?

**A:** You should use caution in these situations. Do not discuss our company's pricing, relationships with business partners, markup/markdown practices or other business practices or those of the competitor. If any anticompetitive topics come up in the conversation, you should refuse to participate and leave the conversation immediately.

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## Intellectual Property

### What to Know

Trademarks, copyrights, music, presentation materials, trade secrets, software, many product designs and other similar assets, as well as people's images and names, are considered intellectual property. Our company owns many valuable intellectual property rights, such as our trademarks Hudson Park and Alfani.

Our company may lose its rights in the intellectual property that it already owns, or risk lawsuits and other penalties, if we fail to comply with certain laws.

We must use our company's and others' intellectual property only as authorized.

If we violate this, our company may be subject to substantial damage claims.

### What to Do

We must not use the intellectual property of others without their permission. This applies to everything from social media posts to the art hanging in our stores and props in our advertising.

We may use the intellectual property of the company only for the benefit of the company, and should not allow others to use our intellectual property except in accordance with prescribed procedures.

Similarly, if and when the company is permitted to use others' intellectual property, we must follow the reasonable usage guidelines provided.

We must not give or receive the right to use intellectual property or retain someone to create it, without a written agreement that is reviewed by our Law Department.

If any of us makes a discovery, or develops an invention, design, process, creative work, concept, or idea in the course of our employment with the company, the company owns it. We should assist the company's lawyers in documenting the company's ownership. This does not apply if an invention is unrelated to the company's business and did not result from your work for the company. Even in that case, it must be developed entirely on your own time, without using the company's equipment, supplies or facilities.

### Artificial Intelligence ("AI")

AI has great potential but can also create IP, data security, and other risks. Review the company's Guidelines for Use of AI before using AI for your work at the company or hiring a vendor who will use AI. Most generative AI uses and some other types of AI use require approval from the AI Taskforce. To request approval, fill out and submit the Security Assessment Intake Form. The form and the Guidelines are both available on the intranet under Tools and Resources -> Technology Help and Support.

## Advertising

### What to Know

Our advertising must be truthful. We want to earn and keep our customers' trust by advertising clearly and accurately and substantiating our product claims and comparison prices.

Our policy is to comply with all applicable laws, including those that govern pricing, product quality, product information, product availability and shipping, among others.

### What to Do

Our offers should be clear, and any restrictions or limitations should be prominently disclosed so that customers get what they expect when they visit our stores or websites.

We also follow our company's advertising guidelines and policies, including the Retail Advertising Guidelines. All members of the Merchant, Planning and Marketing teams and others who deal with pricing must understand and comply with those Guidelines.

## Product Integrity and Purchasing Practices

### What to Know

We put our customers first by selling quality products and standing behind them and requiring our vendor to do the same, regardless of country of origin.

Our customers trust us to take all appropriate steps to ensure that the products we sell meet high standards for safety and quality, and are manufactured in a socially responsible manner. To that end, we require vendors to adhere to our Vendor and Supplier Code of Conduct. Since our brands represent us, we have additional requirements for vendors who make product labeled with one of our brands.

### What to Do

To safeguard our company's reputation and customer goodwill, we must ensure that the products and services we sell are safe.

Product safety is the responsibility of each one of us.

Buyers and product developers must make every effort to ensure that the products or services our company sells perform as we claim they do and are manufactured as we state they are.

Store colleagues must identify potential safety and quality issues and follow company procedures to report them promptly. In addition, store colleagues must follow company guidelines related to recalls and returns of allegedly unsafe or defective products.

In all aspects of sourcing, production, sale and investigations of claims or recalls, we should partner with our Law Department to ensure that we are in compliance with all applicable laws.

### All colleagues in

- stores, including store managers, general and department managers and their staff,
- buying organizations, including buyers and planners, product developers and designers, as well as other colleagues who have or are likely to design or produce merchandise such as colleagues on special events teams or Corporate Marketing,
- customer service, including MCCS' Presidential and Retail Groups and Corporate Communications, and
- risk management, including claims adjustors

must use [this link](#) to access, read and understand our company's [Product Safety Policy and Procedure](#).

## Government Investigations and Contacts

### What to Know

Our company's policy is to cooperate with appropriate governmental requests or investigations, and to comply with all applicable laws governing contacts with government officials. Our Law Department is responsible for managing all such requests, investigations or contacts and providing accurate and truthful formal company responses.

### What to Do

If asked to provide information or a response – verbal or written – on behalf of the company for a government request or investigation, promptly notify the Law Department. This helps ensure the company responds timely (information often is needed quickly) and appropriately. Only certain people may formally represent the company, and we must never obstruct, influence, mislead or impede an investigation.

Any contacts with government officials for the purpose of influencing legislation, regulations or decision-making may constitute lobbying. We must not contact or communicate with any government official for such purpose on behalf of the company without having specific authorization. If a need arises to do so, contact the Law Department.

### Political Activities

The use of company funds for political activities is heavily regulated and the company has established policies and procedures to comply with all applicable laws. No corporate funds may be used for political activity without compliance with those policies and procedures. Any questions regarding corporate political activities should be directed to the Law Department.

## Being Responsible... ESG Responsibilities

### Sustainability: Environmental, Social and Governance

#### What to Know

Our company cares about the environment and complies with all environmental protection laws.

Our company has implemented many sustainability programs that go several steps beyond the requirements of the law and are aimed at preserving and protecting the environment. These steps include measures to conserve energy, recycle materials, and prevent the waste of valuable resources like water and electricity.

Our company seeks to live up to its value of "Giving Back" by caring for and enriching every community in which it operates. Our long-established tradition of giving back to our communities is orchestrated through various company-sponsored community service programs, such as "Partners In Time".

Our company requires our Vendors to comply with our Vendor and Supplier Code of Conduct which includes a prohibition against child labor, slavery and human trafficking. The company's Vendor Code of Conduct is located at <https://www.macysinc.com/purpose/our-commitments-and-policies/default.aspx>.

#### What to Do

**We must demonstrate our company's commitment to preserving and protecting our environment in all our actions for the company, including by complying with all applicable laws.**

We must learn about our company's sustainability programs and make a conscious effort to not waste valuable resources and dissuade others from doing so.

Additionally, our actions must uphold and demonstrate our company's goal of giving back to every community in which we live or do business.



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