

# COMPLIANCE POLICY MANAGEMENT POLICY



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## **Purpose**

The compliance policies and related procedures (collectively, "Compliance Policies and Procedures" of Neiman Marcus Group and its affiliated entities (collectively, the "Company") are designed to ensure compliance with, among other things, our Code of Ethics & Business Conduct and applicable laws. Company Compliance Policies and Procedures are managed by the Company's Corporate Compliance Committee ("CCC"). Only the CCC has the authority to issue or materially revise the Company's Compliance Policies and Procedures. This policy is intended to ensure we have a uniform process for the creation, approval, adoption, and maintenance of Company Compliance Policies and Procedures.

## **Scope**

This policy applies to the creation, approval, adoption, and maintenance of Company Compliance Policies and Procedures.

## **Policy**

### *Definitions*

- "Compliance Policy" means any compliance-related policy or other document reflecting standards or rules that regulate or guide organizational actions and employee conduct and are applicable (e.g., Conflict of Interest Policy, Anti-Corruption Policy, Data Privacy Policy, etc.).
- "Policy Owner" is the content owner of the policy who serves as the subject matter expert with primary responsibility for policy governance in their area of expertise. The Policy Owner will also determine the appropriate individuals or groups that should be involved in the policy governance process in their area of expertise.
- "Designated Policy Manager" is the associate(s) designated as responsible for reviewing, updating, and/or recommending policies within their areas of responsibility.
- "Procedure" means a document describing the stages or steps necessary to complete a particular process intended to supplement and/or support a policy.

### *Policy Creation, Approval, and Update*

The Company maintains an appropriate portfolio of Compliance Policies and Procedures to address and takes into account the various risks arising from or related to the Company's various businesses, the interests of the Company's various stakeholders, industry best practices, compliance program best practices, and applicable laws.

To assure compliance policies are consistent with legal requirements, our Code of Ethics & Business Conduct, and our other policies, the CCC shall follow these requirements:

- Compliance Policies and Procedures Creation
  - Program-Level Policies: The CCC shall approve the initial list of baseline compliance policies that will be prepared.
  - Risk Area Policies: The CCC shall request the creation of any new issue-specific policies.
  - Existing Non-Compliance Policies: The CCC shall determine which existing non-compliance policies should be reviewed for consistency with the Company's compliance program.
  - Additionally, any Designated Policy Manager and any Policy Owner may, on their own initiative, undertake to identify topics to be covered by a new policy, and may review and propose revisions to existing policies as described herein at any time deemed necessary. The Policy Owner shall present to the Chief Compliance Officer, for review and presentation to the CCC for approval, any proposal for a new or revised policy.
- Policy Approval Process
  - The Chief Compliance Officer and designated members of the CCC will prepare the first draft of baseline and issue-specific compliance policies and procedures, as well as revisions to existing policies.
  - The Chief Compliance Officer and selected members of the CCC will submit the first draft of the policies via email to the CCC for review.
  - The CCC shall provide feedback on any draft policy via redlined draft or comments before the CCC meeting. The Chief Compliance Officer will incorporate the revisions and present a draft of the revised policy at the CCC meeting.
  - CCC members will vote on the approval of each policy presented separately.
  - If a policy is not approved, the discussed revisions will be prepared and approved in the manner described herein.

- Periodic Update
  - Each year, the CCC will review all Compliance Policies and Procedures and determine whether any require revisions or updates or should be eliminated due to being unnecessary or obsolete.
  - Policies may be initiated or reviewed as necessary in response to a change in the nature or extent of Company business activity, regulatory requirements, best practices, recognized policy weaknesses, or when recommended by key stakeholders (e.g., the board of directors, senior management, in-house counsel, industry associations, consultants, etc.).

#### *Compliance Policy and Procedure Content*

Compliance Policies and Procedures shall consist of concise descriptions of expected behavior, practice, or standard presented in simple wording so they are easily understood (and translated as needed) and shall be assigned a distinctive number and effective date and submitted for approval.

After approval, such Compliance Policies and Procedures may, when necessary, be translated into other languages, and shall be uploaded to the Company's intranet site.

No Compliance Policies and Procedures shall be published to the Company's intranet site without the concurrence of the CCC. New and updated Compliance Policies and Procedures shall be communicated across the organization with a dedicated communication campaign.

#### *Document and Archive of Policy Modifications*

The Company's Chief Compliance Officer shall designate one or more people to create and maintain a historical database to track and document all policy changes and updates.

### **Responsibilities**

The Chief Compliance Officer is responsible for interpreting this policy and for the ongoing monitoring of Compliance Policies and Procedures as well as assessing the effectiveness of Compliance Policies and Procedures and presenting updated policies to the CCC for approval.

The CCC is responsible for approving all Compliance Policies and Procedures prior to their issuance, as well as approving any material changes to existing Compliance Policies and Procedures. The CCC shall also ensure the content has been appropriately vetted by other applicable stakeholders.

The Chief Compliance Officer is responsible for reviewing any requests for a waiver or permission to deviate from a Compliance Policy or Procedure. Each request shall be submitted for prior approval of the Chief Compliance Officer together with all applicable information, will be considered on a case-by-case basis, and shall only be granted in exceptional circumstances.

### *Guidance*

For guidance regarding this policy, or to report a potential violation, you may contact the Chief Compliance Officer or may access AllVoices at NeimanMarcusGroup.AllVoices.co or by phone at 1-844-204-3624.

Policy Name:	Compliance Policy Management Policy
Policy Number:	CC-0001
Effective Date:	December 2, 2022
Last Revision Date:	June 7, 2024

*Approved by Corporate Compliance Committee 6-7-2024.*