

NMG SOCIAL MEDIA POLICY – ALL ASSOCIATES

Neiman Marcus Group (the Company or NMG, NM, Neiman Marcus, or Bergdorf Goodman) respects the legal rights of its employees ("Associates") and understands that Associates' time outside of work is their own. However, Associates should be mindful that their social media activity, even if done off premises and while off-duty, **could affect their employment as well as Neiman Marcus Group's legitimate business interests** (which we will protect). Associates are encouraged to utilize social media to share Neiman Marcus Group (Company or NMG, NM, Neiman Marcus or Bergdorf Goodman) specific content and products for sale.

This Policy provides a framework including requirements and limitations on responsible social media activity by all Associates. **You will see some sections which may apply to you depending upon the noted activities and/or job responsibilities given your role at NMG.** However, this Policy does not and cannot cover every possible situation or social media activity. For this reason, Neiman Marcus Group relies on the good judgment of its Associates to engage in social media activity responsibly.

For purposes of this Policy:

- **"Commercial use"** means promotion for the purpose of trying to sell goods or services.
- **"Neiman Marcus Group Social Selling or Promotion"** means selling or promoting Neiman Marcus Group products and services using a social media account, page, or handle.
- **"Social media or social media activity"** includes all types of posts and other communications on the Internet, including but not limited to, posts on social networking or affinity sites (e.g., Facebook, WeChat, Line, TikTok); blogs and other on-line journals and diaries (e.g., Blogger, Tumblr); bulletin boards and chat rooms; microblogs (e.g., X (formerly Twitter), Weibo); and posts of photographs, video or audio on media-sharing sites (e.g., Flickr, Instagram, YouTube).
- **"Social media activity"** also includes permitting, or failing to remove, posts by others where the Associate can control the content of posts, such as on a personal page or blog.

To the extent that any provision of this Policy conflicts with the Policy for Corporate Use, Associates must comply with the Policy for Corporate Use when engaging in Neiman Marcus Group Social Selling or Promotion.

You acknowledge that you have received and read this Policy and agree to abide by it and acknowledge that all corporate social media accounts and-related data and information (including customer contacts) belong to NMG and not to you. You also acknowledge that should you leave NMG's employ (for any reason) NMG will retain ownership of such customer contacts and corporate social media accounts, and you must immediately cease use of the same.

You understand that at all times and within NMG's sole discretion, NMG has the right to remove you as a user and to deny you access for any reason to corporate social media accounts.

If you have any questions, please speak with your manager, a member of People Services or

email SocialMediaFAQ@neimanmarcus.com.

Know and Follow the Rules:

Your social media activity is subject to all pertinent Neiman Marcus Group policies, including, but not limited to, the Code of Ethics and Business Conduct, the Associate Handbook, the Acceptable Use Policy, and the Information Security Policies, which may be amended from time to time. **Violations of this Policy will lead to disciplinary action up to and including termination of employment.**

Act Responsibly:

We expect you to use good judgment in all situations and familiarize yourself with and follow the Code of Ethics and Business Conduct and the Associate Handbook. Be honest in all communications; never knowingly or recklessly spread false information about Neiman Marcus Group, our partners, or our competitors. **Always treat peers, customers, shareholders, vendors, partners, and competitors in a considerate manner.**

Be Transparent & Ethical:

Unless you have received prior authorization from Neiman Marcus Group Corporate Communications and/or Social Media teams to speak on Neiman Marcus Group's behalf, you should not represent or suggest in any social media activity that you are authorized to speak for Neiman Marcus Group, or that Neiman Marcus Group has reviewed or approved your content.

Due to your role with Neiman Marcus Group, please be mindful that followers and customers may view you as an extension of The Company, we ask that in any posts addressing social causes or deeply held beliefs, you need to be clear that you are not speaking on behalf of NMG. You may do so by stating that "Views expressed are my own not those of Neiman Marcus Group." in your bio and including a short message like "views are my own" or "views my own" on any of your posts regarding such topics that are unrelated to your role at NMG.

Correct Any Errors or Omissions:

For small errors or omissions, be sure to immediately correct them, and make clear what has been corrected/edited. For major errors or omissions (e.g., privacy issues, exposing customer data), please contact SocialMediaFAQ@neimanmarcus.com immediately so we can help minimize the effects. Whatever you do, please use your judgment to assess the error or omission as small or major, and don't ignore, neglect, or try to conceal the error or omission. You are responsible for your actions, so take charge – and accountability.

NMG is an Equal Opportunity Employer – Non-Discrimination, etc. on Social Channels

As you know, Neiman Marcus Group is an equal opportunity employer and we take seriously our commitment to our policies and our obligations to comply with the law with respect to hiring, employing and other dealings with applicants and associates without regard to their race, religion, national origin, gender, age, disability, pregnancy, marital status, sexual orientation, gender identity, genetic information, or any other category protected by law.

You should never take any action on a social network that may be viewed or perceived as discriminatory. Additionally, any actions taken on social networks that are influenced by personal relationships or by illegal or inappropriate motives of any kind are strictly prohibited, as is retaliation for reporting such actions.

You should not post content about, or any image of, Neiman Marcus Group, management, co-workers or customers that is vulgar, obscene, threatening, intimidating, knowingly or recklessly false, or a violation of Neiman Marcus Group's policies (or laws) against discrimination, harassment, or hostility on account of a legally protected class, status or characteristic, such as race, age, or disability.

You should not post any content, image, or video of yourself that identifies you as a Neiman Marcus Associate and depicts you engaging in illegal conduct, such as acts of violence or the illegal use of drugs, or in conduct that violates any Neiman Marcus Group policy (or laws).

Identify Yourself in Endorsements:

The Federal Trade Commission requires that endorsements be truthful and not be deceptive or misleading. If your social media activity endorses Neiman Marcus Group's products or services, i.e., expresses opinions, beliefs, findings or experiences concerning Neiman Marcus's products or services, you must disclose your name and position with Neiman Marcus Group, and include the appropriate hashtag #iworkatNMG, #iworkatNM, #iworkatBG.

Recognize Intellectual Property Rights:

Recognize the intellectual property ("IP") rights of Neiman Marcus Group and others. You should not use, copy, publish or post someone else's IP for commercial use (i.e., selling purposes) unless you have the legal right to do so.

Examples of IP which cannot be posted are: photos/videos of celebrities wearing product available at Neiman Marcus, trademarks and trademarked events (e.g., Superbowl, Oscars, etc.), music not licensed through the relevant social media application.

Neiman Marcus Group cannot and will not provide Associates with legal advice about IP laws unless the inquiry relates to Neiman Marcus Group's own legitimate business interests.

Posting On/Impersonating Neiman Marcus-Sponsored Sites:

Associates may not use Neiman Marcus Group-sponsored sites directed to current or prospective customers, vendors, or investors to solicit for or promote, or engage in other activities on behalf of, unrelated organizations, including but not limited to, personal business ventures, charities, political campaigns, religious groups, or other membership organizations. Associates may not use the Neiman Marcus name or marks to impersonate an official account on behalf of a store or division, as such accounts are managed by the Neiman Marcus Group Social Media team. If you wish to have an official store handle created, please contact SocialMediaFAQ@neimanmarcus.com.

Restriction On Use of Corporate E-Mail Address:

Unless engaging in Neiman Marcus Group Social Selling or Promotion as permitted by this Policy or otherwise authorized, Associates may not use their Neiman Marcus Group e-mail address to register for any external social media account or site, or as an identifier needed to participate in any external social media activity.

Protecting Confidential Company Information and Restrictions:

As with everything in this Policy, the below restrictions need to be strictly followed:

- Don't: Publish, post, or release information about your Associate Discount or sample sales
- Don't: Publish, post, or release information that is considered confidential, protected, sensitive or defined as Personally Identifiable Information ("PII"). **The Company defines confidential information as nonpublic information containing customer's personal information, customer account information, or payment card information, and information about a co-worker to which you have been given special access to use in the performance of your job responsibilities which that co-worker has not given you permission to share.** Additionally, PII is defined as a person's name, in combination with their social security number, driver's license number, state identification number, or financial account information, including credit and debit card numbers.
- Don't: Discuss non-public sales and profit figures, strategies and forecasts. Unless explicitly given approval by your manager, do not disclose future promotions/activities.
- Don't: Publish, post, or release information about any merchandise pricing comparisons.
- Don't: Give out or transmit nonpublic personal information of customers. This includes information from our intranet and other customer lists such as names, social security numbers, bank and credit account information, driver's license numbers, or state ID numbers.
- Don't: Share details about what customers are in your store or what they purchase when they visit or call.
- Don't: Post images which contain models' faces. Your usage could be subject to fees or legal action.
- Don't: Publish, post, or release information on any product with fur. Please reference the associate FAQ for additional information. Visit [Neiman Marcus Group - Policies](#) for our animal welfare policy.
- Don't: Use Professional Networking Sites such as LinkedIn to do Social Selling.

Be a Good Listener:

One of the biggest benefits of social media is the ability to listen to customer feedback. Remember that when you respond to a customer as a Neiman Marcus Group Associate, you may be perceived as representing the company, so be a good listener in all communications.

Direct feedback and any customer questions to the appropriate NMG channels when necessary.

If a customer posts comments that you believe are highly critical, negative, or false about Neiman Marcus Group, do not attempt to respond on behalf of Neiman Marcus Group. Instead, inform the Neiman Marcus Group Social Media team and the NMG Corporate Communications team so that an authorized spokesperson with subject matter expertise and permission from the company can respond on behalf of the company.

Social Media in the Workplace – For Store Associates:

NMG pays for all time worked, which includes the time you engage in social media activities (social networking activities) as a Neiman Marcus Group representative. Examples of time worked (work hours or hours worked) that must be recorded may include:

- Using a Mobile Device for updating work-related social media communications, showing merchandise to a customer outside of the store using social media
- Engaging in phone calls, texts, direct messages, or e-mails to or from a customer outside of your scheduled work hours regarding business matters

This list of examples is not all inclusive. If you are uncertain whether any time worked by you must be recorded, please contact your Manager or People Services representative.

On the next scheduled workday following any work performed outside of scheduled work hours or work performed outside of the store, you must enter all hours worked into the Timekeeping System, or complete a Timekeeping Adjustment Form to record these work hours immediately upon returning to your work location. Remember, please ensure that you are clocked in or have recorded your work time when you're using these tools for business reasons, otherwise we will presume your time spent social networking is not work-related.

Please refer to the NMG Handbook on proper recording of time worked policy.

Basic Requirements for Associates - Limited Personal Use:

- You may use Neiman Marcus Group's electronic resources to engage in social media activity for non-business purposes if that activity does not interfere with your or your co-workers' job responsibilities and complies fully with all Neiman Marcus Group policies. You may not maintain an open connection to, or stream, any social media site while at work or while using NMG's electronic resources. Such non-business use is a privilege that may be withdrawn if misused.
- If you identify yourself as a Neiman Marcus Group Associate (for example, while posting on a Social Media site such as Instagram), make sure that you accurately describe your position.
- **Do not post any information which is deemed confidential (see "Protecting Confidential Company Information and Restrictions" above).**
- Should you leave NMG's employ for any reason, please immediately stop representing yourself as a current Neiman Marcus Group Associate, for example, by removing such information from your social media bio.

SOCIAL MEDIA POLICY FAQ

Q: Am I allowed to have the Neiman Marcus Group name on my Instagram handle?

A: This is not necessarily prohibited, but we recommend that you avoid using the Neiman Marcus Group name, or variations of it, (e.g. @sarah_at_neimans or @sarah_neimanmarcus) in your Instagram handle. Instagram has started removing accounts who are pretending to be associated with retailers and taking down unverified accounts with brand names in their IG handles. We urge you not to have the Neiman Marcus or Bergdorf Goodman name in your handle to prevent your account from unintentionally getting locked or deleted by Instagram. Regardless of your handle, you must mention that you are a Neiman Marcus Group associate and what your role is in your Instagram bio, as stated in the Social Media Policy.

Q: Should I set up a personal, creator, or a business account on Instagram?

A: You must set up your account as a public business account since you are participating in social selling.

Q: Can I post fur?

A: No, Neiman Marcus Group has phased out fur products as part of our commitment to ESG. Visit [Neiman Marcus Group - Policies](#) for our animal welfare policy.

Q: Can I use music in my posts?

If you are an employee using your social media account for selling, it is mandatory for the account to be a professional or business account. The account has to be set up as a "Digital Creator". Once the account is a professional account, you as an employee will only see music options on the app music library that have clearance to be used on their content. Associates should only use music directly from the app's music library, music that is taken from someone else's account could be protected by copyright laws.

Q: A brand sent me a gift. Can I post the gift and tag them?

A: No. Tagging or linking to an external brand is considered a conflict of interest, regardless of if the link is commissionable or not.

Q: Can Neiman Marcus help get my account verified on Instagram?

A: No, Neiman Marcus is not submitting accounts to get verified.

Q: Can I repost and/or reuse pictures and content from celebrities and/or influencers?

A: No. We do not have the rights to use celebrity or influencer images and content and monetize from it.

Q: Can I repost and/or reuse pictures and content from my fellow sellers?

A: We encourage you to have a respectful open dialogue with your fellow sellers and discuss if this is okay with them.

Q: Can I repost and/or reuse pictures and content from sellers who work for other retailers?

A: No. Competitors own their own imagery, and we do not have the rights to use it.

Q: Can I post on social media about sales & promotions before they start?

A: This is okay if the sale/promotion information is already public and not a private sale (for select clients only). Make sure that you are not posting sale products from any of the restricted brands in our social media policy.

Q: Are there requirements on the content types I post?

A: Use your best judgment. Is this a story you'd want a Neiman Marcus Group executive to see coming from you? What would our brand partners think? Check the background. Avoid logos or other retailers or brands we do not carry/are prohibited from promoting in frame. Before you start posting, review the NMG best practices guide for more tips on what kinds of images best represent the company or contact the Social Media team for further guidance.

Social Media Policy FAQ Continued: Restricted Brands

Q: I see other sellers posting restricted brands. Can I post them, too?

A: No. We will always communicate if there are any changes that happen in our Social Media Policy. These brand restrictions are in place to maintain our relationships with our brand partners and must be strictly followed.

Q: Can I post a picture of a restricted brand in the background if it is not the focus of the post and if I do not mention it?

A: No. This is still displaying the restricted brand in a 1:many fashion. Always be mindful of the background of your content.

Q: Can I repost a client that tagged me in their post featuring an item from a restricted brand that they purchased?

A: No. This is still displaying the restricted brand in a 1:many fashion.

Q: Can I post "DM to see new [restricted brand] arrivals" if it is text only and doesn't feature merchandise?

A: No, This is still speaking about restricted brands in a 1:many fashion. You may not use other brand names to refer to restricted brands (e.g. "DM to see new CC arrival" when referring to Chanel). Chanel has specified that the use of Chanel, Chanel product or style names and Coco trademarks are strictly prohibited in any way on social media, including for use in Associate social media username, profile, or bio.

Q: Can I have any of the restricted brands as a highlight on Instagram or mention them in my bio?

A: No. This information is still available in a 1:many fashion for your followers.

Q: I am in a private [restricted brand] group on Facebook with clients and sellers from other organizations. Can I post there?

A: No. This is still visible to other clients-- even if you are responding to a certain post—and therefore is 1:many communication. 1:1 via private messenger or DM is the only appropriate way to communicate about restricted brands via these channels.

Q: Can I post my own personal property of a restricted brand on social media if I explicitly state that it is my property?

A: This is okay if the purpose of the post is not for selling of any kind. For shoes, clothing & accessories from restricted brands, you must be pictured wearing them or have them styled with other pieces.

Handbags must be styled with other pieces as well. The restricted brand must *not* be the sole focus of the post and must be worn as a styling piece. You may not mention if the item is still available for purchase.

Q: If I post on social media about a sweater and I happen to have on a piece of jewelry or shoe from a restricted brand, is that okay so long as it's a styling piece and not the focus? Does it make a difference if it is my own property?

A: There cannot be any transactional verbiage in a post if a restricted brand is pictured. This is still considered 1:many selling.

Q: Can I do a personal iCloud album or Photo Circle (app) of restricted brands for an individual client that is private and just for them?

A: A personalized, curated assortment of photos can be sent to the client on a 1:1 basis only.

Q: Can I use WhatsApp or WeChat to share pictures of restricted brands if it is 1:1?

A: Yes, if it is 1:1.

Q: Can I send out on-brand photos of restricted brands via Connect?

A: Yes! Connect is a communication tool that messages clients individually. Please ensure the photos follow the brands' photography requirements.

Q: Can I still use iCloud albums or Photo Circle of restricted brands for internal communication only with associates to share images?

A: Yes! You can use these tools internally so long as no customers are on the iCloud or Photo Circle. You would need to download photos and send them to clients individually to create a personalized, curated shopping experience.

Q: Can I repost imagery from restricted brands that the Neiman Marcus Instagram account uses?

A: Yes! You may repost content from the brands' owned and operated media, and Neiman Marcus Social Media channels, posted within the previous 6 months. Do not crop out the handle of the account you are re-posting from. Do not include any selling language.

Q: Can I repost imagery from the official IG accounts of restricted brands?

A: Yes, just make sure that you are not cropping out the brand's official IG handle when you are reposting them. Do not include any selling language.

Q: If my social account is private, can I post restricted brands?

A: No—and if you are using a social account to sell, your account must be public.

If you have any questions, please ask your immediate supervisor, email your inquiry to socialmediafaq@neimanmarcus.com or People Services.