

## NMG SOCIAL MEDIA POLICY – SELLING ASSOCIATES & SOCIAL SELLING OR PROMOTION



The NMG SOCIAL MEDIA POLICY – ALL ASSOCIATES applies to you. This Policy applies to you in full or in part depending upon the noted activities and/or job responsibilities given your role at NMG.

**You acknowledge that you have received this Policy and the NMG SOCIAL MEDIA POLICY – ALL ASSOCIATES and agree to abide by them 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.**

Associates are encouraged to utilize social media as a way to share Neiman Marcus Group specific content and products for sale. However, in doing so, the lines may be blurred between public and private, personal, and professional. Neiman Marcus Group has strong legitimate business interests in protecting our business and regulating social media activity that appears to represent Neiman Marcus Group. As a result, all of our Associates who engage in Neiman Marcus Group Social Selling or Promotion must comply with this Policy across all digital/social media channels, accounts and handles. Only select stores are approved to have a social account. Please note that any additional store accounts (or accounts on new social platforms) must first be approved prior to creation.

Please note that the customer contacts made through Neiman Marcus Group Social Selling or Promotion are the property of Neiman Marcus Group; should you leave NMG's employ for any reason, your customer contacts, Neiman Marcus Group images, and any usage rights you've acquired immediately go back to the company. For questions, please contact [Code.Legal@neimanmarcus.com](mailto:Code.Legal@neimanmarcus.com).

- You must include your title, company (NMG, Neiman Marcus, or Bergdorf Goodman), and work location on your bio on Instagram, Facebook, X (formerly Twitter), TikTok or other applicable social media sites when you are selling or promoting Neiman Marcus Group products, events and/or services, whether in your personal or professional capacity. (Example: Style Advisor at Neiman Marcus North Park).
- If you repost images, make sure they are from the official Neiman Marcus Group corporate handles or an official Brand Partner, or from other NMG approved sites, like our website. When reposting images, ensure the handle of the account you're reposting from is fully visible.
  - o Examples: @NeimanMarcus, @Neimansman, @neimanmarcusgroup, @bergdorfgoodman

Remember, our customers may see you as an extension of Neiman Marcus Group; therefore, we encourage you to utilize your professional social media accounts in furtherance of your role with the company. Should your account feature both personal and professional posts, you need to be clear and state that "Views expressed are my own not those of Neiman Marcus Group."

You must include this disclaimer (e.g., "Views expressed are my own, not those of Neiman Marcus Group") in your bio and on any of your posts regarding topics that are unrelated to your role at NMG.

- Your profile must be a professional account, and public.
- Posts may not contain nudity.
- 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.
- If the associate is using their 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" it cannot be set up as an "Entrepreneur". Once the account is a professional account, the associate 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.

### **Avoid Conflicts of Interest:**

Blogging, posting, or chatting about products or fashion not available at Neiman Marcus Group, but in a product category offered by Neiman Marcus Group, is considered a conflict of interest, including linking to an external brand/product not carried at Neiman Marcus Group, with or without a commissionable link. Please avoid engaging in such conflicts of interest.

Promoting Neiman Marcus Group products through an affiliate link such as Amazon Affiliate, reward Style/ LIKEtoKNOW.it (LTK) or similar mechanism presents a direct conflict of interest with the associate compensation model.

If you have questions about this, please speak with your manager or People Services. Conflicts of interest are also outlined in the Code of Ethics and Business Conduct.

### **Brands Posting Restrictions:**

You must adhere to the following brand guidelines. You will be notified by the company if any posts violate such brand guidelines and upon notification should immediately remove the offending post. Any violation of Brand Posting Restrictions, and any additional posts in violation of the brand guidelines, may lead to disciplinary action up to and including termination of employment.

#### **No Creation of Original Content:**

- Chanel\*
- Goyard
- Van Cleef and Arpels
- Schiaparelli (see below)

\*Additional Chanel restrictions: Chanel has specified to the company 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. **Please see the**

## **SOCIAL MEDIA POLICY FAQ for frequently asked questions.**

You cannot create content featuring these brands and distribute on one to many (aka 1:many) channels. One to many channels include:

- Social Media public accounts
- Social Media, photo and chat groups (including Facebook, messenger, Whatsapp, WeChat, photo circle, etc.).
- Private Social Media accounts
- Close friends on Instagram
- Group texts or group albums
- Any other channel that is not a 1:1 communication with the customer

You may repost content from the brands' owned and operated media, and Neiman Marcus Social Media channels, posted within the previous 6 months as long as there is no selling verbiage.

### **Creation of Content Allowed Within Brand Guidelines:**

The following brands allow Associates to create and post content so long as the brand guidelines are followed.

- David Yurman:
  - Include @davidYurman, #DavidYurman and #DavidYurmanMen respectively
  - Shoot straight angle and portrait mode if possible
- Chanel Beauty:
  - Include #CHANELBeautyAdvisor on the post
- Schiaparelli
  - Associates may repost from official Schiaparelli IG account, NMG account featuring Schiaparelli, and may also use Schiaparelli assets that will be available and distributed through internal corporate channels.
  - Digital Stylists and DCA associates may post original content
  - No posts that include pricing information

### **Offers, Giveaways, & Contests:**

Offers, giveaways and contests are a great way to engage with customers and increase traffic both online and in-store. However, you should never create and publicize your own offers, giveaways or contests. If you have an idea for a contest, offer, or giveaway, share it with your manager so that it can go through the company's applicable standard review process. Social media is a branding opportunity for sharing merchandise approved for posting, so feel free to share any offers, giveaways or contests that Neiman Marcus has shared on its social accounts on your professional accounts.

Make sure not to post about private or exclusive company offers or promotions.

You cannot accept free gifts from any brands that do not go through Neiman Marcus & the gifting policy.

### **Selling personally owned merchandise:**

Selling your own merchandise that is not from Neiman Marcus Group on a channel where you also sell Neiman Marcus Group merchandise is a conflict of interest and not allowed. Any personal merchandise selling must happen on a personal account that is not used for Neiman Marcus Group selling and client communications. For reselling merchandise previously bought from

Neiman Marcus Group, please see the associate handbook guidelines.

## **Images, Copyright & Celebrities:**

Music, films, and celebrity images, among other items, are heavily protected by copyright laws and other intellectual property laws, especially for commercial use. We must respect brands, trademarks, and copyrighted material, as we do with our Neiman Marcus Group branded items. Just because something is posted or being circulated online (applicable to social selling) does not mean it is okay to copy or repurpose.

You should only use photos, videos or products, etc. that are available on NeimanMarcus.com, BergdorfGoodman.com and other Neiman Marcus Group social channels. Prior to posting any photo(s) of individuals (customers, co-workers, etc.) who are personally identifiable and/or portrayed in the photo(s), remember to get their consent.

## **Other Sites:**

A significant part of the interaction on our approved sites (including X (formerly Twitter), Facebook, Instagram, Pinterest, TikTok, WeChat and Snapchat) involve sharing interesting content or linking to relevant items; but please remember that you are ultimately responsible for any content you circulate on your networks.

- Pay attention to the security warnings that pop up on your computer before clicking unfamiliar links. They protect you, Neiman Marcus, and our customers from malware like computer viruses.
- When using X (formerly Twitter), Facebook, Instagram, Pinterest, Snapchat, or other social media platforms, be sure to follow their published terms and conditions.

## **Protecting Customer Information:**

You have a responsibility to protect customer information as an NMG Associate. This extends to engaging with customers via social media platforms & social selling.

- Associates should not solicit for clients to send credit card or other PII information to them via digital channels including social media websites, apps on corporate or personal devices, and via text on iMessages
- If you receive an unsolicited credit card photo or number from a client, you should immediately delete it and do not keep (retain) it.
- You may ask a client to confirm the last 4 digits of their credit card digitally, but nothing more than that
- You should not retain or store any customer information on any social platforms such as credit card account information, customer personal information or any other such information
- You must take every precaution to protect customer information and themselves from having sensitive information compromised.

## **Remember:**

If a member of the media or a financial analyst contacts you regarding your social media activity on behalf of the company, refer them to the Corporate Communications or Investor Relations team. If you have any questions about what is considered confidential, check with your manager or People Services.

If you discover that company confidential, sensitive, protected information or personally identifiable information (PII) has been disclosed to a third party, you should promptly notify your local Loss Prevention Department or email [NMGSLPOPS@neimanmarcus.com](mailto:NMGSLPOPS@neimanmarcus.com).

Everything is searchable and shareable online. Online conversations are never private.

To ensure your safety, be careful about the type and amount of personal information you provide. Avoid talking about anyone's personal schedules or whereabouts.

See the Code of Ethics and Business Conduct for more information.

## **SOCIAL MEDIA POLICY FAQ**

### **Q: Am I allowed to have the Neiman Marcus 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 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 seller 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](mailto:socialmediafaq@neimanmarcus.com) or People Services.*

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- Level one bullet example (indent 0.13, hanging 0.25)
  - Level two bullet example (indent 0.38, hanging 0.25)
    - Level three bullet example (indent 0.63, hanging 0.25)

If you have questions regarding this policy, please contact your supervisor, a People Services Leader, or submit a correspondence through the NMG All Voices Platform.