CODE OF BUSINESS CONDUCT AND ETHICS

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Nordstrom is committed to doing business honestly, ethically and in compliance with all applicable legal requirements. We also believe we have a responsibility to serve our customers over the long run by doing our part to address the issues facing the planet and its people today. Nearly every part of our business has an impact on human rights and the environment. The Nordstrom Code of Business Conduct and Ethics or 'Code of Conduct' provides important information about how we operate our business in an honest and ethical fashion and meet our commitment to doing business responsibly.

The Code of Conduct, as well as the Nordstrom Expectations, apply to all employees of Nordstrom. You are expected to comply with both. You are also expected to comply with any policies, procedures, and guidelines that apply to your location or position. Failure to comply with any expectation may result in disciplinary action up to and including termination of employment.

Please take the time to read the Code of Conduct, the Nordstrom Expectations and any other company policies and guidelines that apply to you, many of which can be found on mynordstrom.com. If you have questions, speak with your manager, the Employee Contact Center, or any leader.

USE GOOD JUDGMENT IN ALL SITUATIONS

Our number one goal is to provide outstanding customer service. For us, it starts with One Rule: Use Good Judgment In All Situations. This includes using good judgment when it comes to taking care of our customers, each other, and the people and companies we do business with.

If you have questions about what using good judgment means, speak with your manager or the Employee Contact Center.

LEADERSHIP COMMITMENT TO ETHICAL BEHAVIOR

Although we expect all employees to meet all expectations, as leaders our culture of ethical conduct starts with you. Nordstrom broadly uses the term ‘leader’ to include anyone in a supervisory or leadership role which can include managers, directors, supervisors, and executive members. We expect leaders to model ethical behavior and lead by example. This means leaders must not only follow all policies and guidelines but must also make sure the employees they support understand and comply with all policies and guidelines.

Leaders are also responsible for understanding the compliance programs that impact their areas and for reinforcing the importance of those controls with the employees they support.

PROTECT NORDSTROM, ITS INTERESTS AND PROPERTY

You are required to protect Nordstrom, its interests, and its property. This includes:

• Following Nordstrom’s policies and ethical principles.
• Complying with all legal requirements that apply to Nordstrom’s business.
• Not using Nordstrom’s property, funds, employees, time, facilities, or equipment for your own personal gain.
• Returning all Nordstrom property and equipment at the end of your employment, including all customer or employee personal information, or sensitive or confidential information.

During your employment you may also be exposed to confidential information about Nordstrom, its customers, employees, or vendors. Confidential information includes non-public information related to:

• Nordstrom’s operations, products, sales, or services.
• Nordstrom’s trade secrets, processes, data, know-how, technology, marketing plans, or strategies.
• Nordstrom customers, employees, and vendors.

You must keep confidential information private and not disclose it to anyone who is not a Nordstrom employee or an agent of Nordstrom who is authorized to receive this information. You should also not disclose confidential information
to Nordstrom employees or agents of Nordstrom who do not have a business reason to know. You must continue to keep confidential information private even after your employment with Nordstrom has ended. Your obligation to keep confidential information private or to not disclose with any people who do not have a business reason to know is not intended to restrict your legal right to discuss the terms and conditions of your employment with others or to otherwise exercise your rights under federal, state/provincial, or local labor laws.

Finally, Nordstrom is the exclusive owner of any:

- Business processes or opportunities you discover through your work or as a result of your employment with Nordstrom.
- Inventions, concepts, processes, formulas, or designs you develop or create using Nordstrom’s resources or as a part of your employment with Nordstrom.

**ACCURATE AND ETHICAL ACCOUNTING**

Nordstrom works hard to be honest and forthright in all aspects of our business. This includes following all applicable financial reporting and accounting laws, rules, and regulations. We expect you to share in this responsibility for accurate and ethical accounting by following all company accounting policies and internal controls. This includes:

- Accurately, properly, and timely recording all transactions in accordance with Nordstrom procedures.
- Retaining or disposing of records in accordance with Nordstrom records retention policies which are available on Nordnet.
- Cooperating fully with internal and external auditors.

Company officers and employees may be called to ensure Nordstrom’s public reports and communications are complete, fair, accurate, and understandable. Each employee and officer who is involved in Nordstrom’s disclosure process must:

- Be familiar with, and comply with, Nordstrom’s disclosure controls and procedures and its internal control over financial reporting.
- Take all necessary steps to ensure that all filings with the U.S Securities and Exchange Commission (SEC) and all other public communications about the financial and business condition of Nordstrom provide full, fair, accurate, timely, and understandable disclosure.

The Nordstrom Board of Directors’ Audit and Finance Committee oversees the process for responding to possible concerns about accounting-related practices.

**CONFLICTS OF INTEREST**

Nordstrom values fair and honest dealings and expects you to uphold these values by, among other things, avoiding conflicts of interest. A conflict of interest occurs when an employee’s personal interest interferes, or appears to interfere with, the interests of, or service to, Nordstrom. The overarching principle is that an employee’s personal interests should not be placed improperly before the interests of Nordstrom.

Conflicts of interest can be caused by your own interests or the interests of someone you have a close personal relationship with, including your family members, others who live in your household, or someone else that is close to you (collectively “family member”).

Although it is impossible to list every situation where a conflict of interest could arise, some examples of potential conflicts of interest include:

- You or a family member receives an improper benefit as a result of your position with Nordstrom.
- You cause Nordstrom to act, or not act, for your own or a family member’s personal benefit.
- You direct Nordstrom’s business to a third party with whom you or your family member has a business interest.
- You or a family member have an ownership interest of more than 2% in a publicly traded company that does business with Nordstrom.
- You or a family member has an ownership interest of any amount in a non-public company that does business with Nordstrom.
- You or a family member are an officer, director/trustee, employee or consultant of a company that does business with Nordstrom.
• You or a family member accepts a gift that does not comply with Nordstrom’s Improper Gifts and Payments policy.

Additionally, workplace relationships can cause conflicts of interest. More information can be found in the Relationships in the Workplace policy found in Nordstrom Expectations.

You must report any actual, perceived, or potential conflicts of interest to the Office of Ethics and Compliance at ethicsandcompliance@nordstrom.com. Nordstrom encourages you to take a broad view in identifying potential conflicts and to think of how a situation or transaction would appear to outside parties. If you are unsure whether a situation creates a conflict of interest, report the situation to the Office of Ethics and Compliance at ethicsandcompliance@nordstrom.com.

BRIBERY AND ANTI-CORRUPTION

Nordstrom prohibits all forms of corruption and bribery and is committed to complying with all anti-corruption laws. Bribe can take many forms and can include anything of value, such as money, gift cards, merchandise, discounts, travel, charitable or political contributions, or offers of employment or internships. You must not engage in any of the following:

• Directly or indirectly offer or give money or anything of value to government officials for the purpose of obtaining or retaining business or to secure an improper advantage. Government officials include foreign and domestic government officials, political parties or their officials, candidates for political office, or employees of companies or organizations if owned in whole or in part by a government.

• Give money or anything of value to expedite a routine government action, sometimes referred to as facilitation or “grease” payment.

• Directly or indirectly offer or give money or anything of value to any representative of another company to gain an undue or improper advantage.

• Offer or give money or anything of value to a third party if you believe or know that third party will use any part of that payment in violation of this policy.

• Authorize other employees to make payments or take actions that violate this policy.

• Engage in any actions that violate U.S. or international anti-corruption laws, rules and regulations.

More information can be found in the Anti-Corruption Policy on mynordstrom.com.

IMPROPER GIFTS

Seeking or accepting gifts, trips, or other items of value from individuals and organizations with whom we do business — or may potentially do business — could create the impression that the gift improperly influenced our decision to do business with the gift giver. As a result, neither you nor your family members may accept gifts from customers, current or potential vendors, or competitors unless the gift is:

• A non-cash gift of nominal value. “Nominal value” generally means the fair market value of all the gifts received from a single customer, vendor, or competitor does not exceed $100 in a calendar year.

• A gift or prize that is an authorized promotional prize provided by a vendor to stimulate business. The $100 limit does not apply.

• Product provided by Nordstrom or by a vendor (‘gratis’) given to employees primarily for product knowledge, as well as to improve familiarity with a vendor’s brand and quality. The $100 limit does not apply.

• A tip if you work in a Nordstrom Restaurant, Specialty Coffee, Beauty Services, Spa, Valet, Shoe Shine department, or any other department where tips are routine.

You may also receive invitations from a current or potential vendor, customer, or competitor to attend a social function, like a meal, sporting, cultural, or entertainment event. Participation in such social functions is generally acceptable and is not subject to the $100 gift limitation above, provided that:

• The vendor, customer, or competitor is also attending the social function with you.

• The cost of your participation in a single social function does not exceed $250.

• Your participation in all social functions with a single customer, vendor, or competitor does not exceed an aggregate value of over $250 in a calendar year.
Participation in a social function that is not generally accessible to the public or where the cost of participation would exceed $250 must be escalated to the Office of Ethics and Compliance at ethicsandcompliance@nordstrom.com for advance approval. If approved, you will be required to pay the cost of your participation that exceeds $250.

Finally, you may be asked to attend vendor-sponsored business-trips. These could include trips to view merchandise or attend educational or business-related conferences. Such trips are also generally permitted provided they have a business purpose, and you receive prior approval from an Executive Team leader.

Review the Employee Complimentary Goods Guidelines available on mynordstrom.com to learn more about Nordstrom’s approach to gifts from individuals or organizations we do business with.

FAIR COMPETITION AND ANTITRUST ISSUES

Nordstrom is committed to competing fairly and ethically in the marketplace and complies with the antitrust and competition laws of countries where we do business.

You must not engage in any discussions or enter into any formal or informal agreements or understandings with competitors on matters such as prices, price fixing, markups, markdowns, allocation of customers, markets, products, wages, and benefits, or any other terms or conditions on which we do business. You should also never use other companies’ confidential or proprietary information that you may have learned at your previous employer. If you have questions about business discussions that may have antitrust implications you can contact Legal at legalsupport@nordstrom.com.

INSIDER TRADING

Using confidential or material information not generally known to the public to trade securities is called “insider trading.” It is unethical and illegal. Employees and officers who, during the course of their employment with Nordstrom, gain knowledge of confidential or material nonpublic information from or about Nordstrom or another company are not permitted to:

- Share or tip off others about such nonpublic information, especially because the individuals receiving such information might use it to trade in Nordstrom securities or securities of the other company.
- Buy, sell, or otherwise trade in Nordstrom securities or securities of the other company, or enter into a trading plan (including a Rule 10b5-1 plan) while in possession of the material nonpublic information about Nordstrom or such other company.

More information can be found in the Insider Trading Policy on mynordstrom.com

REPORTING AND ENFORCEMENT

If you become aware of illegal or unethical behavior, including any violation of this Code of Conduct, immediately report it to one of the below individuals. This includes any potentially illegal or unethical conduct by any third party with whom Nordstrom does business. You may also anonymously report your concerns by calling 888.832.8358 or by visiting ethicspoint.com.

- Any leader
- Human Resources
- Employee Contact Center
- The Office of Ethics and Compliance

All reports will be investigated. Employees and officers are expected to cooperate in any internal investigation of misconduct.

Nordstrom will not take any action to impede an employee from communicating with, providing information to, testifying in front of, participating in an investigation by, or filing a charge or complaint with any governmental, regulatory, or self-regulatory organization or agency such as the Securities and Exchange Commission or OSHA. Nothing in this Code of Conduct is intended to impact or restrict these rights.

We do not permit retaliation of any kind against employees who report misconduct or possible misconduct, raise a concern, participate in an investigation, or engage in legally protected activities. Anyone who retaliates will be subject to disciplinary action, up to and including termination of employment. If you feel you have been subject to retaliation, immediately contact the Employee Contact Center or any leader.
WAIVERS

Waivers from a provision of the Code of Conduct may require prior approval by the Board of Directors or the Corporate Governance and Nominating Committee, along with prompt disclosure to shareholders.

IN CLOSING…

You are part of a legacy of talented individuals who work together to provide the highest level of customer service.

I understand that I am expected to read and comply with the Code of Business Conduct and Ethics and that failure to comply with this Code of Conduct may lead to disciplinary action, up to and including termination of employment.

____________________________________
Employee Name

____________________________________
Employee Signature

____________________________________
Date