

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Nordstrom  
**Sector** Apparel (supply chain and own operations)  
**Overall score** 8.1 out of 100

| Theme score | Out of | For theme   |
|-------------|--------|---|
| 1.9         | 10     | A. Governance and Policy Commitments                |
| 0.7         | 25     | B. Embedding Respect and Human Rights Due Diligence |
| 2.5         | 20     | C. Remedies and Grievance Mechanisms                |
| 1.4         | 25     | D. Performance: Company Human Rights Practices      |
| 1.6         | 20     | E. Performance: Responses to Serious Allegations    |

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policy Commitments (10% of Total)**

**A.1 Policy Commitments (5% of Total)**

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| A.1.1          | Commitment to respect human rights  | 2                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Universal Declaration of Human rights (UDHR): The document Human Rights Commitment indicates: 'We are committed to respecting all human rights, as articulated in the United Nations Universal Declaration of Human Rights'. [Nordstrom Human Rights Commitment, 11/2018: <a href="https://www.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Commitment to UNGPs: The document Human Rights Commitment indicates: 'We are committed to respecting all human rights, as articulated in [...] the United Nations Guiding Principles on Business and Human Rights'. [Nordstrom Human Rights Commitment, 11/2018: <a href="https://www.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul>   |
| A.1.2.a        | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: The document Human Rights Commitment indicates: 'We are committed to respecting all human rights, as articulated in [...] the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. [Nordstrom Human Rights Commitment, 11/2018: <a href="https://www.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>Not Met: Explicitly lists all four ILO core principles</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Expects suppliers to commit to ILO core principles: The Partner Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Partner Code of Conduct, N/A: <a href="https://www.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <ul style="list-style-type: none"> <li>• Met: Explicitly lists all four ILO core principles for suppliers: The Partner Code of Conduct discloses its labor standards, including: no child labor, no force labor, no discrimination and freedom of association and collective bargaining. Regarding the latter, it adds: ‘Suppliers must respect all workers’ rights to freedom of association and collective bargaining. [...] Where the right to freedom of association or collective bargaining is restricted under local law, Suppliers must allow workers to engage in activities that provide similar means for independent and free association and bargaining’. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul>   |
| A.1.2.b        | Commitment to respect the human rights of workers: Health and safety and working hours          | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect H&amp;S of workers: The webpage section Health &amp; Safety Practices discloses general information on health and safety. However, no commitment to respect the health and safety of workers found. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Health &amp; Safety Practices_web, N/A: <a href="http://nordstrom.com">nordstrom.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to H&amp;S of workers: The Partner Code of Conduct indicates: ‘Suppliers must provide safe, hygienic and healthy working conditions that comply with local laws, including health and safety standards related to building structures and facilities, electrical safety, fire safety, chemical safety, sanitation, emergency preparedness, first aid, personal protective equipment and other safety policies. Suppliers must not expose anyone to situations that are hazardous, unsafe or unhealthy, and must prevent and provide protection from accidents, injuries, and exposure to hazardous conditions and materials’. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Partner Code of Conduct indicates: ‘A regular work week shall not exceed 48 hours. Work over 48 hours is considered overtime. Overtime work should be voluntary and compensated at the premium rate required by local law. If local law does not mandate premium rates for overtime, Suppliers must pay the internationally recognized premium rate. Suppliers should not request overtime on a regular basis, outside of events or exceptional circumstances out of the control of the Supplier. Total working hours should not exceed the applicable legal limit or 60 hours per week, whichever is less. Suppliers must ensure their workers are not penalized, punished, or dismissed for refusing to work more than the regular work limits. Workers should be allowed one day (24 hours) off in seven. Suppliers must keep accurate time records’. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> |
| A.1.3.AP       | Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to women's rights</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights: The Forced Labor Policy indicates: ‘Migrant and contract labor is becoming increasingly important in global supply chains. We recognize that unethical recruitment practices may be enablers of forced labor. Because of this, Nordstrom has signed the Commitment to Responsible Recruitment, an industry effort to address potential forced labor risks for migrant workers in the global supply chain. The Prevention Principles outlined below are inclusive of this commitment in an effort to safeguard the rights of workers, particularly migrant and contract workers, throughout our supply chain’. However, no evidence found that the Company is committed to respect migrant workers’ rights. [Forced Labour Policy, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Met: Expects suppliers to respect these rights: As indicated below, the Company expects suppliers to respect the UN Convention on the Rights of the Child which is a proxy for respecting children’s rights. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Met: Expects suppliers to respect these rights: The Partner Code of Conduct indicates: ‘Suppliers must also comply with applicable sections of the [...] UN Convention on the Rights of the Child’. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| A.1.4          | Commitment to remedy                                       | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with suppliers on remedy: The document Human Rights Commitment indicates: 'We support human rights in Nordstrom Product Group's supply chain through social compliance audits, factory remediation efforts, management trainings, and worker empowerment programs. [...] Our goal is to work together with our suppliers to promote compliance in their facilities, develop sustainable management systems and support worker well-being'. However, 'to support through' and 'to have a goal' are not considered formal statement of commitment according to CHRB wording criteria. The Forced Labor Policy states: 'Nordstrom is committed to partnering with Suppliers to remediate any violations of this policy'. However, it only seems to cover this specific policy. [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>] &amp; [Forced Labour Policy, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> |
| A.1.5          | Commitment to respect the rights of human rights defenders | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>   |

## A.2 Board Level Accountability (5% of Total)

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation  |
|----------------|---------------------------------------|------------------|--|
| A.2.1          | Commitment from the top               | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs: The Company states that the Corporate Social Responsibility team, led by the Vice President of Corporate Affairs, maintains this policy and manages collaboration on its continued updates and evolution, based on industry best practices and stakeholder expectations. The Human Resources team, led by the Chief Human Resources Officer, is responsible for the rights of employees. The NPG Social Responsibility team, led by the Vice President of NPG Sourcing and Supply Chain, is responsible for human rights in private-label supply chain. NPG SR collaborates with CSR on human rights issues related to brand suppliers. However, it is not clear whether there is board member included in these teams. [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes HRs expertise of Board member</li> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul> |
| A.2.2          | Board responsibility                  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Process to review HRs strategy at board level</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>   |
| A.2.3          | Incentives and performance management | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>   |
| A.2.4          | Business model strategy and risks     | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>  |

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| B.1.1          | Responsibility and resources for day-to-day human rights functions                        | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The Company states that it has three teams in place to take responsibility to oversight and implement its human right policy, focused on the human rights policy, human resources, and its private label supply chain. It notes that 'Our Corporate Social Responsibility team, led by the Vice President of Corporate Affairs, maintains [its human rights] policy and manages collaboration on its continued updates and evolution, based on industry best practices and stakeholder expectations. Our Human Resources team, led by the Chief Human Resources Officer, is responsible for the rights of our employees.' [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Met: Resources and expertise allocation in supply chain: The Company states in its human rights policy that it has three teams responsible for human rights, one of which looks at its private label supply chain. Specifically, it notes that 'Our NPG Social Responsibility team, led by the Vice President of NPG Sourcing and Supply Chain, is responsible for human rights in our private-label supply chain. NPG SR collaborates with CSR on human rights issues related to our brand suppliers.' [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> |
| B.1.2          | Incentives and performance management   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>  |
| B.1.3          | Integration with enterprise risk management   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>   |
| B.1.4.a        | Communication /dissemination of policy commitment(s) to workers and external stakeholders | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>   |
| B.1.4.b        | Communication /dissemination of policy commitment(s) to business relationships            | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to supply chain: The Company states in its Partner Code of Conduct that its labour standards for suppliers include no child labour, no forced labour, no discrimination, no harassment or abuse, fair wages and benefits, etc. The Company also states that it supports human rights in its supply chain through social compliance audits, factory remediation efforts, management trainings and worker empowerment programs. However, there is no details about how the Company communicates its human right policy down its supply chain. [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>] &amp; [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to communicate HRs policies</li> <li>• Not Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that during 2021, it revised a new vendor process to ensure all new Nordstrom suppliers understand and acknowledge its required standards. The</li> </ul>   |

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <p>Company also states in its Partner Code of Conduct that supplier contracts may contain more specific provisions addressing some of the same issues detailed in its Partner Code of Conduct. However, there is no evidence that how its human rights policy commitments are reflected in its contractual documents. [2021 Impact Report, 07/02/2022: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>] &amp; [Forced Labour Policy, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers</li> </ul>  |
| B.1.5          | Training on Human Rights                        | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments: The Company states in its Human Rights Commitment that at its headquarters, it requires all employees in its private-label group, Nordstrom Product Group, to complete an online social responsibility training, which helps ensure all teams are educated on Partnership Guidelines and the ways our business can impact human rights. It also states in its 2021 Impact Report that it implements training to its employees to protect against forced labour. However, it is not clear whether general training on human rights policy commitments is conducted across all workers. [2021 Impact Report, 07/02/2022: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>] &amp; [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Trains relevant managers including procurement on HRs</li> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>   |
| B.1.6          | Monitoring and corrective actions               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states that it has three teams responsible for the implementation of its human rights policies. The Corporate Social Responsibility team maintains this policy and manages collaboration on its continued updates and evolution, based on industry best practices and stakeholder expectations. The Human Resources team is responsible for the rights of our employees. The NPG Social Responsibility team is responsible for human rights in the private-label supply chain. Besides that, the Company states that 'As a part of our human rights due diligence, we audit factories that make Nordstrom Made products for compliance with our Partner Code of Conduct and implement corrective action plans where necessary'. However, there are no details about how it monitors its policy implementation in its operations and supply chains. [Nordstrom Human Rights Commitment, 11/2018: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>] &amp; [2022 Annual Report, 28/01/2023: <a href="http://press.nordstrom.com">press.nordstrom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses % of supply chain monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul> |
| B.1.7          | Engaging and terminating business relationships | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs performance affects selection suppliers: The Company states that in 2021, it revised a new vendor process to ensure all new Nordstrom suppliers understand and acknowledge its required standards. However, it is not clear how human rights performance influences the Company's supplier selection.</li> <li>• Met: HRs performance affects continuation supplier relationships: The Company states in its Forced Labour Policy that 'Suppliers must immediately notify Nordstrom of any violations of this policy or the principles above that are found in the Suppliers' own operations or their supply chain's operations... Nordstrom will review and may terminate its relationship with any Supplier that violates this policy.' [Forced Labour Policy, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with suppliers to meet HRs requirements</li> </ul>   |

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| B.1.8          | Approach to engagement with affected stakeholders | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul> |

## B.2 Human Rights Due Diligence (15% of Total)

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.2.1          | Identifying human rights risks and impacts   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations: The Company states that it is working with human rights experts Article One Advisors to undertake human rights and forced labour impact assessments. It notes that these assessments will inform its approach to proactively manage human rights and forced labour risks across Nordstrom operations. It states that it is working with Article One to identify salient impacts, risks and opportunities, and to develop a strategic roadmap to proactively manage risks going forward. However, it has not described the process of identify its human rights risks. [2021 Impact Report, 07/02/2022: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes process for identifying risks in business relationships: The Company states that it has due diligence for its supply chains. It notes that it has launched a Human Rights Impact Assessment and a Forced Labour Impact Assessment, led by human rights experts Article One Advisors. It states these steps will help to better identify and mitigate human rights and forced labour risks. In addition, it describes that it regularly audits Nordstrom Made factories to confirm they meet its ethical standards. However, the Company has not described the details of progress it uses to identify its human rights risks in its business relationships.</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: The Company states that its human rights and forced labour impact assessments is led by human rights experts Article One Advisors. However, the Company does not describe a global systems it has in place to identify its human rights risks on a regular basis across its activities involving consultation with affected stakeholders. [2021 Impact Report, 07/02/2022: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul> |
| B.2.2          | Assessing human rights risks and impacts   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks</li> <li>• Not Met: Describes how process applies to supply chain</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>  |
| B.2.3          | Integrating and acting on human rights risks and impact assessments                | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>  |
| B.2.4          | Tracking the effectiveness of actions to respond to human rights risks and impacts | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>   |

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation   |
|----------------|---------------------------------------|------------------|---|
| B.2.5          | Communicating on human rights impacts | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Provides two examples of comms with stakeholders<br>Score 2<br>• Not Met: Describes challenges to effective comms and how it is working to address them |

### C. Remedies and Grievance Mechanisms (20% of Total)

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| C.1            | Grievance mechanism(s) for workers                                   | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Grievance mechanism accessible to all workers: The Company states in its Code of Conduct that 'If you become aware of illegal or unethical behaviour, including any violations of this Code of Conduct, immediately report it to one of the individuals, any leader, Human Resources, Employee Contact Centre, or The Corporate Secretary. 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 <a href="https://ethicspoint.com">ethicspoint.com</a> .' The Company also states that it does 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.<br>[Code of Business Conduct and Ethics, 01/2022: <a href="https://investor.nordstrom.com">investor.nordstrom.com</a> ]<br>Score 2<br>• Not Met: Grievance mechanism available in appropriate languages and workers made aware<br>• Met: Describes how workers in supply chain access grievance mechanism: The Company indicates that workers in the value chain are encouraged to raise concerns. It states that 'We require suppliers to maintain effective mechanisms for their workers to raise concerns, aligned with the criteria outlined in the UN Guiding Principles on Business and Human Rights. [Human Rights website, N/A: <a href="https://nordstrom.com">nordstrom.com</a> ] & [Partner Code of Conduct, N/A: <a href="https://nordstrommedia.com">nordstrommedia.com</a> ]<br>• Not Met: Expects suppliers to convey expectation to their suppliers |
| C.2            | Grievance mechanism(s) for external individuals and communities      | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'We encourage employees, customers, agents, workers in our value chain, suppliers and communities we impact or do business with to raise any questions or concerns they may have. This includes any suspected violations of our Nordstrom Code of Business Conduct and Ethics, our Nordstrom Partner Code of Conduct or other Nordstrom policies.' It further elaborates that 'Customers, agents, workers in our value chain, suppliers and other third parties can visit <a href="https://npg.ethicspoint.com">npg.ethicspoint.com</a> or call 844.852.4175.' [Human Rights website, N/A: <a href="https://nordstrom.com">nordstrom.com</a> ]<br>Score 2<br>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware<br>• Not Met: Describes how external individuals/communities access grievance mechanism: The Company indicates that third parties have access to a grievance process, however, it is not clear if external stakeholders can raise concerns about the conduct of the Company's suppliers. [Human Rights website, N/A: <a href="https://nordstrom.com">nordstrom.com</a> ]<br>• Not Met: Expects supplier to convey expectation to their suppliers  |
| C.3            | Users are involved in the design and performance of the mechanism(s) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Describes how users engaged on design and performance<br>• Not Met: Provides user engagement examples (at least two) on design and performance<br>Score 2<br>• Not Met: Describes how users engaged on improvement of mechanism<br>• Not Met: Provides user engagement examples (at least two) on improvement   |
| C.4            | Procedures related to the mechanism(s) are equitable, publicly       | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Company outlines the procedure of how it manages complaints, however, no information regarding timescales was found. [Human Rights website, N/A: <a href="https://nordstrom.com">nordstrom.com</a> ]  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                | available and explained  |                  | <ul style="list-style-type: none"> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> <li>Score 2</li> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>  |
| C.5            | Prohibition of retaliation for raising complaints or concerns                                  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that it does 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. However, it is not clear whether the Company also has a policy to prohibit retaliation for other stakeholders who reports any misconduct. [Code of Business Conduct and Ethics, 01/2022: <a href="http://investor.nordstrom.com">investor.nordstrom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes practical measures to prevent retaliation</li> <li>• Not Met: Specifies no legal action, firing or violence</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul> |
| C.6            | Company involvement with state-based judicial and non-judicial grievance mechanisms            | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>  |
| C.7            | Remedying adverse impacts  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>  |
| C.8            | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>   |

### D. Performance: Company Human Rights Practices (25% of Total)

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.2.1.a        | Living wage (in own production or manufacturing operations) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets time-bound target</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying a living wage</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul> |



| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| D.2.1.b        | Living wage (in the supply chain)  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts: The Company states that it has a goal to ensure that 100% of Nordstrom Made strategic suppliers pay a living wage in 2025. It also states in that Partner Code of Conduct that suppliers must pay at least the minimum wage, the industry wage, or the wage negotiated in a collective agreement, whichever is higher. Suppliers must not deduct wages that are not provided for by applicable local law. Suppliers are encouraged to pay employees of all genders a wage that not only meets basic needs but also provides discretionary income. However, it is not clear how the company defines a 'living wage'. [2021 Impact Report, 07/02/2022: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>] &amp; [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on living wage</li> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>                                 |
| D.2.2          | Aligning purchasing decisions with human rights  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes practices to avoid price or short notice requirements that undermine HRs</li> <li>• Not Met: Describes practices to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Example of assessing and changing of purchasing practices</li> </ul>   |
| D.2.3          | Mapping and disclosing the supply chain  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>   |
| D.2.4.a        | Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Indicates it does not use child labour</li> <li>• Not Met: Age verification of recruited workers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remediation if child labour found in operations</li> </ul>   |
| D.2.4.b        | Prohibition of child labour: Age verification and corrective actions (in the supply chain)                           | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on child labour in supplier codes and contracts: The Company states that suppliers must have established procedures for age verification as part of their hiring process. Suppliers must not employ anyone under the age of 15, under the minimum age as established by applicable local law, or under the age of completing compulsory education, whichever is older. Suppliers must not expose anyone under the age of 18 to any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of the young worker. Suppliers must not expose anyone under the age of 18 to hazardous work, as defined by ILO Convention 182 and any applicable national hazardous work lists. However, no information was found on remediation programmes. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on eliminating child labour</li> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |
| D.2.5.a        | Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)             | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Job seekers/workers do not pay recruitment fee</li> <li>• Not Met: Commitment to fully reimburse recruitment fees paid</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes implementation and monitoring in own operations, incl. service providers</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.2.5.b        | Prohibition of forced labour: Recruitment fees and costs (in the supply chain)                        | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Requirements on debt/fees in supplier codes and contracts: The Company states that suppliers must ensure that all workers work on a voluntary basis and are free from exploitation. Suppliers must not require workers to pay any fees or other payments to the Supplier or a third-party for the purpose of being hired or as a condition of employment or deduct or withhold such fees from wages or otherwise pass such fees on to workers. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Not Met: Describes work with suppliers on debt/fees for job seekers/workers</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.2.5.c        | Prohibition of forced labour: Wage practices (in own production or manufacturing operations)          | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Pays workers regularly, in full and on time</li> <li>• Not Met: Payslip workers shows wages and legitimate deductions</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes implementation and monitoring in own operations, incl. service providers</li> </ul>  |
| D.2.5.d        | Prohibition of forced labour: Wage practices (in the supply chain)                                    | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states that its suppliers must pay all wages, overtime, and legally mandated benefits regularly, on time, with documentation and compliant wage statements in accordance with applicable laws. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>   |
| D.2.5.e        | Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Does not retain documents or restrict movement of workers</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes implementation and monitoring in own operations, incl. service providers</li> </ul>  |
| D.2.5.f        | Prohibition of forced labour: Restrictions on workers (in the supply chain)                           | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts: The Company states that suppliers must not require workers to live in employer-provided or arranged residences. If voluntary employer-provided housing is available for workers, workers may not be subject to curfews. It also states that suppliers must not retain, confiscate, destroy, or withhold any original personal identification and immigration documents (e.g., passport, national ID, school certificate, work permit, etc.). Workers must have unrestricted and immediate access to these documents. [Forced Labour Policy, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |
| D.2.6.a        | Freedom of association and collective bargaining (in own production or manufacturing operations)      | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Commits to measures prohibiting interference with trade unions</li> <li>• Not Met: Discloses % total workforce covered by CB agreements</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.2.6.b        | Freedom of association and collective bargaining (in the supply chain)  | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Requirements on FoA/CB in suppliers codes and contracts: The Company states in its Partner Code of Conduct that suppliers must respect all workers' rights to freedom of association and collective bargaining. It adds that 'Where the right to freedom of association or collective bargaining is restricted under local law, Suppliers must allow workers to engage in activities that provide similar means for independent and free association and bargaining.' [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>Not Met: Describes work with suppliers on FoA/CB</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>   |
| D.2.7.a        | Health and safety:<br>Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not Met: Describes process to identify H&amp;S risks and impacts</li> <li>Not Met: Discloses injury rate or lost days for own workers in last reporting period</li> <li>Not Met: Discloses fatalities for own workers in last reporting period</li> <li>Not Met: Discloses occupational disease rate for own workers in last reporting period</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not Met: Sets targets for H&amp;S performance</li> <li>Not Met: Met targets or explains why not or how improve H&amp;S management systems</li> </ul>   |
| D.2.7.b        | Health and safety:<br>Fatalities, lost days, injury, occupational disease rates (in the supply chain)                           | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Requirements on H&amp;S in supplier codes and contracts: The Company states that suppliers must provide safe, hygienic and healthy working conditions that comply with local laws, including health and safety standards related to building structures and facilities, electrical safety, fire safety, chemical safety, sanitation, emergency preparedness, first aid, personal protective equipment and other safety policies. Suppliers must not expose anyone to situations that are hazardous, unsafe or unhealthy, and must prevent and provide protection from accidents, injuries, and exposure to hazardous conditions and materials. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>Not Met: Discloses injury rate or lost days in supply chain in last reporting period</li> <li>Not Met: Discloses fatalities for workers in supply chain in last reporting period</li> <li>Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not Met: Describes work with suppliers of H&amp;S</li> <li>Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> </ul> |
| D.2.8.a        | Women's rights (in own production or manufacturing operations)  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not Met: Describes processes to stop harassment and violence against women</li> <li>Not Met: Working conditions take into account gender issues</li> <li>Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not Met: Meets all requirements under score 1</li> <li>Not Met: Analysis of trends demonstrating progress closing gender pay gap</li> </ul>   |
| D.2.8.b        | Women's rights (in the supply chain)  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not Met: Requirements on women's rights in contracts/codes with suppliers: The Company states that suppliers must treat every person with dignity and respect. Suppliers must not subject workers to corporal punishment, coercion, threats, physical, sexual, psychological, or verbal harassment, violence, or abuse. However, it does not have an explicit policy for women workers. [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>Not Met: Describes work with suppliers on women's rights</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.2.9.a        | Working hours (in own production or manufacturing operations) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Respects HRs regarding working hours/breaks/rest</li> <li>• Not Met: Assesses ability of workers to comply with working hours commitments when allocating work</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes implementation and monitoring in own operations</li> </ul>  |
| D.2.9.b        | Working hours (in the supply chain)                           | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Requirements on working hours in codes/contracts with suppliers: The Company states that a regular work week shall not exceed 48 hours. Work over 48 hours is considered overtime. Overtime work should be voluntary and compensated at the premium rate required by local law. If local law does not mandate premium rates for overtime, Suppliers must pay the internationally recognized premium rate. It further states that 'Total working hours should not exceed the applicable legal limit or 60 hours per week, whichever is less. Suppliers must ensure their workers are not penalized, punished, or dismissed for refusing to work more than the regular work limits. Workers should be allowed one day (24 hours) off in seven. Suppliers must keep accurate time records.' [Partner Code of Conduct, N/A: <a href="http://n.nordstrommedia.com">n.nordstrommedia.com</a>]</li> <li>• Not Met: Describes work with suppliers on working hours</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of excessive working hours in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |

### E. Performance: Responses to Serious Allegations (20% of Total)

| Indicator Code | Indicator name          | Score (out of 2) | Explanation   |
|----------------|-------------------------|------------------|---|
| E(1).0         | Serious allegation No 1 |                  | No allegations meeting the CHRB severity threshold were found, and so the score of 6.45 out of 80 points scored in themes A-D has been applied to produce a score of 1.61 out of 20 points for theme E. |

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