

COURTESY  
OBEY THE LAW  
DIGNITY  
**BUSINESS**  
**ETHICS**

JCPenney

**2014 STATEMENT OF BUSINESS ETHICS**

Effective date: 3/31/14



**Dear Associates,**

As we work together in 2014 to return our Company to profitable growth, our commitment to the highest standards of ethics is as important as ever. By acting ethically, we earn the trust and confidence of our customers, our business partners and our fellow associates — trust we need to succeed.

Each year, we revise and republish the Statement of Business Ethics and ask our associates to renew their commitment to these standards by reading the Statement and acknowledging their agreement. Within the Statement of Business Ethics, you will find principles that guide our Company's practices, such as:

- Treating each other, our customers and those with whom we do business with courtesy, dignity and respect;
- Complying with the laws and regulations of the countries, states and cities in which we operate;
- Maintaining records that are true and accurate;
- Protecting Company assets and confidential information; and
- Avoiding conflicts of interest and always acting for the good of JCPenney.

If you find yourself in a position where you are unsure about what to do, the Statement of Business Ethics can guide you. If you need to report a concern about a possible violation of ethics, law or Company policy, or if you need additional information, the Statement will tell you where to find help and how to voice your concerns.

Through the Statement of Business Ethics, we can carry on the legacy established over a century ago by James Cash Penney and our original Company leaders, who challenged us to continually ask ourselves whether our actions square with what is right and just. Thank you for your time and contributions to this legacy.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Ullman". The signature is fluid and cursive, written over a light blue horizontal line.

Myron E. (Mike) Ullman, III  
Chief Executive Officer

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# JCPENNEY STATEMENT OF BUSINESS ETHICS

## Raising Concerns

All JCPenney associates have both the freedom and responsibility to make JCPenney better every day. That starts by fostering a culture of open communication. Your leaders at JCPenney are available to you anytime you want to express any concerns or make suggestions. Associates may raise an issue at any level, but starting with your leader is probably the best first step.

However, jcpLine is another resource – available around the clock – that you can use to raise work-related concerns or other issues. Turn to jcpLine to raise issues involving ethics, legal compliance, employee relations, accounting complaints, loss prevention, safety or JCPenney’s environmental practices.

### jcpLine

Questions? Concerns? Associates may contact jcpLine toll-free by telephone at 1-800-527-0063, or you may visit the jcpLine website [www.jcpLine.com](http://www.jcpLine.com). Associates and others outside the United States may call a toll-free international number. A directory of numbers by country is available at [www.jcpLine.com](http://www.jcpLine.com).

jcpLine is operated by an organization independent from JCPenney. The more information you provide, the better the Company will be able to investigate and take appropriate action. If you choose, you may remain anonymous when you contact jcpLine.

Sometimes it may seem easier to stay quiet or look the other way when someone violates our policies, but doing nothing can also result in serious consequences to you, your fellow associates and/or the Company. Honest and ethical workplaces are built by dedicated associates who are willing to speak out against unethical and illegal behavior. As an associate, it is your obligation to report violations of our Statement of Business Ethics, Company policies and the law.

## No Retaliation for Raising Good Faith Concerns

JCPenney has a strict policy against retaliation, so do not hesitate to raise an issue regarding possible legal, ethical or JCPenney policy violations. Associates who have made a good faith report will not be subject to any adverse action or retribution. Retaliation is not tolerated. Not only do we comply with Company policy, but we also respect and follow the laws of the lands in which we do business. We are residents and citizens of the communities and countries in which we operate, and absolutely must ensure all applicable laws are followed. As we all know, violation of laws can result in corporate and personal criminal and financial liability and penalties, as well as damage to our Company’s reputation.

When you call or visit the jcpLine website, you will be provided a case number to use if you wish to call back to seek or provide more information.

When in doubt about a legal issue, call the Legal Department. If you are uncertain which attorney to call, consult the [Legal Directory by Topic](#) webpage.

CALL	CLICK	WRITE
800-jcp-0063 (800-527-0063)	<a href="http://www.jcpLine.com">www.jcpLine.com</a>	333 Research Court Norcross, GA 30092 Attn: JCPenney

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If you believe that you or another associate has been harassed or discriminated against, immediately notify your leader or your HR representative. If you prefer, you may call jcpLine at 1-800-527-0063. Your concerns will be investigated promptly and treated in as confidential a manner as possible. For further information, consult the [EEO Policy](#).

Information is considered material if it would be expected to impact a reasonable investor's decision to buy or sell JCPenney stock. For example, material information would be a significant upward or downward revision of earnings forecasts, a significant restructuring change, a major management change or a significant acquisition or divestiture. Guidelines with respect to trading in JCPenney securities, as well as the securities of publicly traded companies with whom JCPenney has business relationships, are more fully set out in [JCPenney's Securities Trading Policy](#).

We also require our vendors to comply with all laws and our business ethics principles. For further information, see the Company's [Supplier Principles](#).

## We Provide Equal Employment Opportunities

Courtesy. Dignity. Respect. We do not compromise on these principles. Everyone at JCPenney should and must be treated with courtesy, dignity and respect. Current associates, potential candidates and applicants must experience equal employment opportunities. This means that employment decisions are made without regard to race, color, religion, ethnicity, national origin, sex, sexual orientation, gender identity and expression, marital status, family status, active military or veteran status, age, disability or other status protected by law.

We are also committed to creating a harassment-free environment for all our associates, partners and customers. No exceptions.

## Securities Laws

As JCPenney associates, we work on a lot of projects and developments, many of which are not disclosed to anyone outside of JCPenney. Trading in JCPenney securities when you have such information or sharing JCPenney internal information to influence anyone's decision to buy or sell our stock can lead to real consequences, including civil and criminal liability and penalties, as well as termination of your employment.

As an associate, you should never engage in transactions in JCPenney or another company's securities (including through the 401(k) Savings Plan) when you have material information not available to the public. Likewise, you should never give undisclosed "inside" information to others for their use in transactions in JCPenney or another company's securities.

In addition, associates may not:

- Enter into options trading or short selling, or other similar derivative transactions, in JCPenney securities;
- Hedge or monetize transactions, such as zero-cost dollars and forward sale contracts in which the associate continues to own the underlying JCPenney security without the full risks and rewards of ownership; and/or
- Purchase Company shares on margin, hold Company shares in a margin account or pledge Company shares as collateral for a loan. A margin sale or foreclosure sale may occur at a time when the associate is prohibited from trading because he or she possesses material non-public information.

# JCPENNEY STATEMENT OF BUSINESS ETHICS

These actions are inconsistent with the associate's duties to JCPenney. These actions may also violate securities laws, which could result in criminal and/or civil liability for the associate and/or the Company.

Associates should not disclose material non-public information to anyone outside of the Company (including family members, former associates, vendors and other business contacts), except where disclosure is needed to enable JCPenney to carry on its business and appropriate steps have been taken to ensure the protection of that information. Within JCPenney, associates should only discuss or disclose material non-public information when needed to conduct JCPenney business and when they have no reason to believe that the information will be misused or improperly disclosed by the recipient.

## Antitrust

JCPenney believes in free and fair competition. The Company obeys all antitrust laws, also known as competition laws. These laws protect consumers by promoting competition in areas such as pricing, service, merchandise selection or quality and innovation. JCPenney does not act in ways that suppress competition, such as price fixing, allocation of markets or allocation of vendors. Price fixing occurs when two or more competitors agree to set a price. Allocation of markets or vendors occurs when competitors agree to split up vendors, products or customers (for example, by geography) to avoid competing in those areas or markets. Associates must avoid agreements with competitors or vendors that would have any of these or other anticompetitive effects. When participating in industry or benchmarking groups, associates should avoid sharing information or making agreements that would limit competition. Violations can lead to serious consequences for both the Company and the individuals involved.

## Bribery & Anti-Corruption Prohibitions

We do not tolerate bribery or corruption, regardless of where we are located or where we do business. Never pay, promise or offer, directly or indirectly, money or anything of value to a government official or political party for the purpose of influencing, retaining or directing an official act or decision in order to obtain or retain business or secure an improper advantage. Always comply fully with the anti-bribery and anti-corruption laws of the countries in which we do business, including the [Foreign Corrupt Practices Act \(FCPA\)](#). No business or partnership is exempt from these restrictions. There are limited legal exceptions to these principles which require prior approval from the Legal Department.

### Bribery of Public Officials

No assets of the Company nor any other funds may be used to bribe or influence any decision by an employee of any government department or

Not all bribery takes the form of cash payments. It can take the form of gifts, travel, entertainment, employment or anything of value or benefit or any unfair advantage. While token hospitality gifts or entertainment may be appropriate in a particular situation, extravagant gifts or entertainment of government officials is never appropriate.

For further guidance, refer to [Foreign Corrupt Practices Act \(FCPA\)](#).

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agency, government-owned entity, international organization, political party or candidate for political office. The FCPA and laws of other countries strictly prohibit giving, promising or offering money or anything of value, directly or indirectly, to such persons in order to obtain or retain business or to gain any improper business advantage. Associates may not give, promise, offer or authorize, directly or indirectly, any payments to government officials of any country. The prohibition applies to any payments made or thing of value provided through consultants, suppliers or other third parties on our behalf.

## Commercial Bribery

Associates are strictly prohibited from paying a bribe or giving anything of value or benefit or giving any unfair advantage intended to influence the judgment or business conduct of a person in a position of authority. Similarly, associates may never accept or solicit bribes, kickbacks, payoffs or other types of payments from any organization or individual seeking to do business with, doing business with or competing with JCPenney.

## Political Activities

JCPenney associates should feel free to become involved in political affairs and the political process if they are interested, but please do not bring it to work. Such activities must be restricted to the use of an associate's personal time, resources and facilities. An associate may choose to make a political contribution or participate in the political process or choose to avoid doing so. These choices will never impact an associate's employment.

Corporate payments of anything of value, including cash, merchandise or services, in connection with political activities are, generally, either illegal or strictly regulated by law. Further, the Company's contacts with, and donations to, federal, state and local legislators and executive branch officials are also regulated by law. Failure to comply with these regulations could result in fines or criminal penalties.

## Communications

Being fair and honest in everything we do means ensuring that any message we release to our associates, our customers and the public is accurate and truthful. JCPenney endeavors to comply with the laws in the areas of product information, pricing, product availability, credit terms, warranty statements and telephone and Internet order procedures, among others.

Our stockholders, customers, vendors and communities all need to know that they can trust us to do what is honest and right. No associate should intentionally manipulate or misrepresent information communicated to our associates, our suppliers or the public.

For information on gifts, entertainment and related issues, see the sections on Relations with Vendors and Gifts, Meals, Entertainment and Travel.

If an associate wishes to hold public office, whether elective or appointed, the potential for conflict of interest, or the appearance of conflict, must be taken into account. Therefore, associates must disclose the intent to seek public office to their leader and on the Certificate of Compliance available through the [Associate Kiosk](#). Associates must receive a positive response prior to initiating any action.

All proposed contacts, payments, donations or services in any of these areas must be reviewed in advance and approved in writing by JCPenney's Vice President, Government Relations. For more information about political involvement, visit the [Government Relations / Penney PAC](#) website, or email [grgroup-sm@jcp.com](mailto:grgroup-sm@jcp.com).

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## Books, Records and Accounts

We must maintain books, records and accounts that, in reasonable detail, accurately and fairly reflect the business transactions. False or misleading entries are prohibited. No fund, asset or account of the Company may be established or acquired for any purpose unless such fund, asset or account is accurately reflected in the Company's books and records.

## Protecting Company Property

Anything developed for JCPenney is also owned by JCPenney. Company assets are acquired, used and disposed of for the benefit of the Company and its stockholders and never for the personal benefit of associates. Each associate must comply with JCPenney procedures in order to protect the assets of the Company and avoid situations that may harm the reputation of JCPenney or create financial liability.

Any act of theft, fraud, embezzlement or misappropriation of property is strictly prohibited and will not be tolerated. Company funds or assets should never be used for unlawful purposes. In addition, associates should never take or make available to others any JCPenney property for reasons that do not support the Company's business. This includes tangible assets such as cash, inventory, equipment, supplies, displays, samples and intangible assets such as Company brands, trademarks, ideas, inventions, strategic plans and processes and the data and information to which associates have access as a result of their work responsibilities.

## Our Creations

Inventions, designs, patterns or innovations conceived or devised by associates are a major point of pride for our business. These creations drive the business and must therefore be protected. An asset belongs to JCPenney if it: (a) arises out of or is suggested by work performed by an associate for the Company, (b) results from the associate's use of Company time, facilities, equipment or supplies, or (c) arises out of or is suggested by an associate's use of JCPenney resources, trade secrets or confidential information. When an associate's invention is deemed an asset of JCPenney, the associate must assign the invention to the Company.

## Safeguarding Company Information

JCPenney considers all non-public information concerning any aspect of JCPenney business or information acquired by associates as a result of their employment to be confidential Company information. Associates may not disclose to others or use for their benefit, or for the benefit of another, any confidential Company information without appropriate authorization. Even within JCPenney, confidential Company information should only be shared on a need-to-know basis.

For further guidance, refer to the [Information Security Policy](#).

## JCPENNEY STATEMENT OF BUSINESS ETHICS

Your obligation to preserve confidential Company information continues even after your employment ends. If you take JCPenney proprietary or confidential Company information with you when you leave the Company, or if you access JCPenney information without authorization, you may be subject to criminal and/or civil liability. Associates must also protect other companies' confidential information. Associates should never disclose or use the confidential information of their previous employers or of any other company in conducting business on behalf of JCPenney. Further, associates must protect confidential information of companies conducting or hoping to conduct business with JCPenney.

JCPenney takes information security seriously. The Company's electronic resources, including the Internet, are to be used by associates for conducting legitimate Company business. All associates granted access to JCPenney information or systems must have a legitimate business need for that access. Incidental personal use is permissible so long as it: (a) does not consume more than a nominal amount of resources, (b) does not compromise the confidentiality of JCPenney information, (c) does not place Company networks and information at risk, and (d) does not unduly interfere with business activity. JCPenney maintains ownership rights in all information contained in its electronic resources and reserves its right to access at any time any information contained in its electronic resources. The contents of electronic files may be disclosed to others without the consent of the associate.

Every associate is responsible for complying with JCPenney's [Information Security Policy](#) and reporting suspected security violations or potential security weaknesses to their leader, the Information Technology Service Desk (ITSD) or jcpLine immediately.

In addition, leaders are also expected to ensure that all associates they supervise and vendors they oversee are aware of these policies and procedures, and leaders must promote compliance with them.

### Media Relations

Associates may not respond to inquiries (written or verbal) regarding JCPenney from media (print, broadcast or online), news organizations, trade publications or any other source without prior approval from Media Relations. Our Media Relations department handles all media inquiries. If you talk directly to reporters without going through Media Relations, you run the risk of providing incorrect information, revealing proprietary strategies or damaging our Company's reputation. Instead, direct media inquiries to Media Relations at 972-431-3400.

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# JCPENNEY STATEMENT OF BUSINESS ETHICS

## Use and Protection of Customer Information

JCPenney recognizes and respects the privacy of our customers. Therefore, all information about our customers must be treated with extreme care. Associates should only use or disclose that information to others, whether fellow associates or third parties, as needed for authorized Company business purposes and in accordance with applicable laws and regulations.

This responsibility includes taking appropriate steps to prevent the unauthorized disclosure or use of, or unauthorized access to, information about our customers – particularly personal information such as names, addresses, telephone numbers, email addresses, driver’s license numbers, social security numbers and credit/debit card or checking account numbers. It also includes the appropriate disposal of customer data in all forms.

## Associate Privacy and Personal Activities

JCPenney and its associates also have a duty to handle (and protect) the personal information of all associates with care. We must prevent the unauthorized disclosure or use of, or unauthorized access to, this information. This duty also includes the appropriate disposal of personal information about associates in whatever form it is kept.

In most circumstances, associates may keep their personal activities outside of the workplace confidential. Still, you should always keep in mind that you are a representative of JCPenney and that you have no expectation of privacy on any JCPenney system or device.

## Conflicts of Interest

Every single day JCPenney relies on its leaders and its associates to use good judgment and uphold its ethical principles. The Company cannot spell out every possible situation that an associate might face. Instead, JCPenney relies upon the good judgment of our associates. This means being aware of potential conflicts of interests, whereby an associate’s personal life (activities, relationships or financial affairs) could inappropriately influence or appear to inappropriately influence the associate’s judgment in performing his or her responsibilities at JCPenney. All associates are expected to avoid activities, interests or relationships that would create a conflict of interest or the appearance of impropriety or conflict of interest.

A full and prompt disclosure of facts regarding potential conflicts is necessary to avoid problems. The determination of whether there is a conflict, or appearance of a conflict, will be made by the Company, and not by the associate(s) involved.

Consult the [Customer File Management Manual](#) or our [Privacy Policy](#) for policies and procedures related to the use of information about customers and the [Information Security Policy](#) for guidance as to measures that should be taken to protect JCPenney’s confidentiality.

For further information, consult the [Information Security Policy](#).

If you are ever in doubt about whether a particular situation or relationship would cause a conflict of interest between yourself and JCPenney, you are required to make a full and prompt disclosure of the facts regarding the potential conflict of interest. This disclosure must be made using the Disclosure box of the Certificate of Compliance available in the [Associate Kiosk](#). Any disclosure must be approved before further action can be taken.

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## Relatives

The possibility of a conflict of interest is at its peak when a relative is involved. Associates must avoid decisions of any kind that involve relatives. Associates should not be in a position to make or influence a decision relating to another company in which both JCPenney and a relative have an interest or could derive a benefit. The same goes for decisions involving organizations where your relative has a business or personal relationship. No relative of a JCPenney associate in a leadership position will be permitted to call on the Company as a representative selling or seeking to sell goods or services unless the matter has been disclosed and approved in advance.

## Interest in Competitors

Associates have a duty of loyalty to JCPenney, so they should never have any direct or indirect interest in or involvement with any competitor of the Company if it might interfere with, influence or appear to influence associates in the performance of their Company duties. This specifically includes working for a competitor while working for JCPenney.

Ownership of stock in a competitor will not be deemed a conflict of interest if both of the following conditions exist: (a) the stock is publicly traded, and (b) the amount owned by the associate does not exceed one tenth of 1% of the outstanding shares of the competitor.

## Relations with Vendors

JCPenney selects vendors on the basis of price, quality and performance. Associates must avoid personal, financial or other involvement with a vendor with whom they do, or are likely to do, business. Additionally, associates should never purchase products directly from vendors doing business with JCPenney, or with whom JCPenney is negotiating to do business, unless the vendor has its own retail/service operations, and then only at prices available to the general public. Associates are prohibited from using their employment status at JCPenney to request or influence any JCPenney associate, vendor or potential vendor of JCPenney to provide the associate or relative with anything of value (including any preferential treatment or favorable pricing) for the personal use or interest or financial gain of the associate or relative. Vendors should never be solicited to engage in activities outside of the business relationship by associates.

## Solicitations of Vendors for Nonprofit Organizations

At JCPenney, we care about our communities, and many of our associates participate in activities on behalf of nonprofit organizations. Although it may be permissible for an associate to solicit a vendor on an occasional basis

For these purposes, "relative" includes your spouse, domestic partner, child, parent, brother and sister and their spouses.

For purposes of this Statement, "competitors" include any company which offers services or products similar to those offered by JCPenney.

JCPenney may negotiate special discounts on vendor merchandise or services for its associates. Any such discounts that are not part of our benefits programs must receive written approval from [ethics@jcp.com](mailto:ethics@jcp.com).

# JCPENNEY STATEMENT OF BUSINESS ETHICS

for a nominal contribution to a recognized charity in a fundraising event, an associate should make it clear that any donation is voluntary and should never give a vendor the impression a contribution is expected in order to maintain its relationship with JCPenney. In no event should vendors be asked to contribute money to a nonprofit in exchange for access to JCPenney leadership.

## Gifts, Meals, Entertainment and Travel

Good business relationships are built through trust and integrity, not through the exchange of gifts and other favors. Participation in business-related functions, including, on occasion, the acceptance of lunches, other meals or occasional entertainment or sporting events, is a normal and permissible business practice. On rare occasions, it may be appropriate for travel expenses of associates to be paid by a vendor, but only if the trip is solely for business purposes and is approved in advance by the associate's leader. Entertainment trips at even partial vendor expense should never be accepted.

Whenever an associate accepts gifts, meals, entertainment or travel, care must be exercised to ensure that such functions serve a business purpose, that their value and frequency are not excessive, and that there is reciprocation. In cases where reciprocation does not seem possible, but you believe it is in the Company's interest to attend, you must obtain the approval of your leader.

Gifts and gratuities should never influence your judgment or be used to influence another's judgment. If accepting any gift, meal, entertainment or travel, even of nominal value, would influence your business judgment, you should never accept it. The same is true if you believe the motive is to influence your business judgment.

## Loans

Associates should never accept loans from any persons or entities having or seeking business with JCPenney except from recognized financial institutions, at the normal interest rates offered at the time of borrowing. In discussing personal financing with banks, no associate should state or imply that the bank's response will in any way affect its relationship with JCPenney. Our business relationships with financial institutions are never to be utilized to influence in any way personal loans to associates.

## Former Associates

Associates who leave JCPenney may not call on the Company as a representative of a vendor selling or seeking to sell goods or services. Former associates may only do so after one year has elapsed since the former associate left the Company.

Your unit or department may have additional requirements about reporting and receiving approval before accepting gifts, meals, entertainment or travel involving vendors. It is a good idea to check with your leader on this subject.

"Reciprocate" means to give and take mutually. In other words, if a vendor provides you a gift, meal or anything of value, you should return the favor.

"Nominal value" means, generally, not more than \$50 in retail value. If an associate receives a gift with a retail value of \$50 or more from a vendor, he or she should notify their leader immediately.

Non-cash gifts of nominal value generally used for promotional purposes by the donor are acceptable.

Requests for exceptions can be made to [ethics@jcp.com](mailto:ethics@jcp.com).

# JCPENNEY STATEMENT OF BUSINESS ETHICS

## **Diversion of Corporate Opportunity**

An associate should never appropriate to himself or herself, nor divert to any other person or entity, a business or financial opportunity that the associate knows, or reasonably could anticipate, the Company would have an interest in pursuing.

## **Product Safety**

JCPenney does not compromise on product safety. JCPenney is committed to safety standards set by law and adheres to rigid safety and quality standards of its own, such as never knowingly selling any unsafe product. We also work to minimize hazards from products that inherently entail some risk. Our customers have a right to expect that the products we sell will not endanger their health or safety.

## **Health and Safety**

Every company has health and safety regulations. They are there to protect you and your fellow associates. We have a shared responsibility to follow all safety rules and practices. Associates must cooperate with officials who enforce those rules and practices to take necessary steps to protect themselves and other associates. This includes your attendance at required safety training and immediately reporting all injuries and unsafe practices or conditions to leadership or to jcpLine. Our goal is to provide all associates with a clean, safe and healthy work environment.

## **Be Loyal**

At JCPenney all associates have a duty of loyalty to the Company. When it comes to our work, our personal actions and decisions must reflect that which is in the best interest of JCPenney. These actions and decisions must be unclouded by the associate's private or professional interests in other organizations or persons.

Associates should report any information or complaints regarding the safety of products sold by JCPenney to the Testing and Product Safety team at [productsafety-sm@jcp.com](mailto:productsafety-sm@jcp.com).

For further reference, please refer to [Environmental Health & Safety](#) and/or [Supply Chain Safety](#).

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## Contacts

Use this Statement of Business Ethics as your first source for information about ethics and standards of conduct. For the most current versions, refer to the electronic documents online. If you don't find the answer you need, contact the appropriate resource listed below:

RESOURCE	LINK	CONTACT INFO
Communications		972-431-3400 or <a href="mailto:jcpnews@jcp.com">jcpnews@jcp.com</a>
Customer File Management Manual	<a href="#">Customer File Management Manual</a>	
Environmental, Health & Safety	<a href="#">Environmental, Health &amp; Safety</a>	
Equal Employment Opportunity (EEO)	<a href="#">EEO Policy</a>	
Ethics & Compliance		<a href="mailto:ethics@jcp.com">ethics@jcp.com</a>
Ethics Web Page	<a href="#">Ethics</a>	
Foreign Corrupt Practices Act (FCPA)	<a href="#">FCPA</a>	
Government Relations/Penney PAC	<a href="#">Government Relations/Penney PAC</a>	972-431-1763
HR Policies and Procedures	<a href="#">HR Policies and Procedures</a>	
Information Security Policy	<a href="#">Information Security Policy</a>	
Information Technology Service Desk (ITSD)		1-800-214-4822
Investor Relations	<a href="#">Investor Relations</a>	972-431-5500
jcplLine	<a href="#">jcplLine</a>	1-800-527-0063 or <a href="http://www.jcplLine.com">www.jcplLine.com</a>
Legal Directory by Topic	<a href="#">Legal Directory by Topic</a>	
Media Relations	<a href="#">Media Relations</a>	972-431-3400
Privacy Policy	<a href="#">Privacy Policy</a>	
Product Safety Director		972-431-8257
Store Operations Procedures	<a href="#">Store Operations Procedures</a>	
Supplier Principles	<a href="#">Supplier Principles</a>	
Supply Chain Safety	<a href="#">Supply Chain Safety</a>	

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