

## GLOBAL BUSINESS STANDARDS

A Message from Jim Keane



Trust, integrity and mutual respect are integral to our company's culture. Our core values of "Act with integrity" and "Tell the truth" have guided our behavior and business practices for over 100 years. We want to do not only what is right, but what is best. And we want everyone we deal with – customers, dealers, competitors – to know this is how we will do business.

In today's business environment, it's important to stand behind our commitments. We ask all of our employees to go through training on these standards to demonstrate that we take these issues seriously. It boils down to this: Do what's right, and if you think something isn't right, say something. Talk to your leader, or use our integrity line.

We are in business together. Your reputation is our company's reputation. Thank you for all you do to uphold our high standards,

A handwritten signature in black ink, appearing to read "J. Keane". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

James P. Keane  
President and Chief Executive Officer

## **GLOBAL BUSINESS STANDARDS**

### **A Global Company**

Being a global company means that the way we do business must recognize and comply with the laws and regulations of international commerce. It requires understanding the laws and culture of all countries in which we are located or serve customers. Because Steelcase is a U.S. registered public and multi-national company, it may require that U.S. law take precedence in situations where the laws of another country may conflict.

### **We are in this together**

*Steelcase employees make decisions every day.*

It is our responsibility to act lawfully, ethically, fairly and in a manner that sustains healthy business relationships and instills loyalty. We want you to know how to handle situations and who to call for answers to your questions and concerns.

### **Contents**

- purpose of the Global Business Standards
- our responsibilities
- why and how to get help
- the areas covered by the Standards
- related policies and procedures
- who to call list

## **GLOBAL BUSINESS STANDARDS**

### **Why do we have the standards?**

The Steelcase Global Business Standards are based on many sources: government regulations, cultural values, customs, ethics and our company core values.

Our Global Business Standards explain the behaviors required to ensure legal compliance and reduce the risk of inappropriate choices. Some functional areas require more thought and careful consideration when making judgment calls, such as: antitrust practices, conflict of interest, copyright infringements and purchasing agreements.

**While there are certainly right and wrong answers, there is generally only *one* best answer for our employees.**

The directors, executives and officers of the company are ultimately held responsible for establishing and ensuring policies and procedures in support of these standards and our corporate code of conduct.

## **GLOBAL BUSINESS STANDARDS**

### **The Global Business Standards Policy**

The Global Business Standards are based on common business standards and practices. They work with, but do not replace corporate and governmental regulations.

You are expected to abide by corporate policy, practices, guides, handbooks and the laws and regulations governing the areas where we do business.

Our Global Business Standards applies to all employees around the world at all Steelcase entities. In addition, our partners, dealers, suppliers, service providers, consultants and others with whom we do business are expected to conduct their activities accordingly when supporting Steelcase.

We are a U.S.-based multinational company. As such, many of the laws of the United States apply to our foreign operations. In those cases we will comply with the U.S. laws first, and then take in to account the laws of others countries. If you believe these laws conflict, contact the Steelcase Legal Strategies Team or Jim O'Connor, Vice President, Corporate Compliance Officer.

In addition, we expect people (for the collective interest of the company) to report violations or raise ethical concerns without delay. Steelcase policy protects employees from being threatened or punished in any way for reporting suspected violations of our Global Business Standards.

We take great pride in our company's reputation for integrity, so our corporate standards go beyond obeying the legal and regulatory minimums required in countries where we do business. We encourage our people to honor the spirit and intent behind these guidelines, and we want to align ourselves with businesses that also embrace high ethical, legal and regulatory principles.

## **GLOBAL BUSINESS STANDARDS**

### **The Integrity Process**

- Discuss with your manager or team leader*
- Talk to your Human Resources or Employee Relations manager*
- Use the Integrity Line*
- Use the Open Door process*

### **Know What to Do and Where to Go for Help**

First take your concerns to your manager or team leader. If they are unable to help you, or if this is inappropriate, use the Integrity Line. You should always feel free to speak out about situations that can cause legal, safety, environmental or other potential problems at work.

The purpose of the Integrity Line is to help resolve concerns, not identify the person reporting an issue. Every effort is made to keep this service confidential. The consultant you will speak to is not a Steelcase employee. You will not have to give your name when you call. There are no recorders or devices that can identify you or trace the number from which you are calling. If you choose to file a report, you will be given a tracking number so that you can check back on the status of the report without revealing your name.

### **Protecting Those Who Report Concerns**

Company policy ensures that no retaliation occurs as a result of anyone who raises or pursues an ethical, legal or regulatory issue. Moreover, every effort will be made to protect the confidentiality of individuals who report questionable actions.

### **Integrity Line Telephone Numbers**

Additional information is always available through the GBS INTEGRITY LINE website (<https://www.compliance-helpline.com/welcomePageSteelcase.jsp>).

## **GLOBAL BUSINESS STANDARDS**

### **Our responsibilities are far reaching**

*There are six areas in which we share responsibility:*

- To each other
- To our employees
- To our shareholders
- To our customers
- To our business partners
- To our worldwide communities

*These are described in detail on the following pages.*

### **Responsibilities to each other**

We are accountable to:

- Understand and support our Global Business Standards
- Comply with applicable laws and regulations (some of which are based on United States laws)
- Comply with applicable company policies and practices
- Maintain a high standard of honest and appropriate business behavior
- Avoid compromising situations (i.e., where one helps or appears to help another person violate any law, regulation or company policy)

Our leadership team is required to:

- Understand and support our Global Business Standards
- Explain our business conduct guidelines to the individuals they lead, especially those who are newly hired, promoted or have taken on different responsibilities
- Avoid compromising situations
- Train our team members to ensure they are aware of, and are in compliance with legal and regulatory issues regarding their jobs
- Create an open environment where ethical, regulatory and legal issues can be discussed openly
- Act with integrity and set an example of high ethical behavior

## **GLOBAL BUSINESS STANDARDS**

### **Responsibilities to our employees**

*Within this category are six additional key standards to which all employees must adhere:*

- Treat people with dignity and respect*
- Embrace diversity*
- Respect employee privacy*
- Develop employees*
- Use the Open Door*
- Provide a safe and healthy environment*

#### Treat people with dignity and respect

The company will not tolerate discriminatory behaviors or practices within any of our work environments. Our people have the right to work in an atmosphere that is free from intimidation, threats, hostility, violence, harassment or disruptions to work performance. You are expected to promptly report discriminatory or harassment behaviors if they are observed. We will comply with the employment laws in the countries in which we operate.

#### Develop employees

Development opportunities are ensured through the Performance Management Process, training, tuition reimbursement, teamwork and career planning.

#### Embrace diversity

A company does not exist without its people. We are committed to supporting and embracing diversity and inclusion throughout our work force, our suppliers and our dealer network.

#### Use the Open Door

Our employees are invited to discuss concerns with management. All employees are encouraged to go to their Employee Relations managers or request an opportunity to discuss issues with another member of Steelcase management. There is a process for using the Open Door designed to resolve issues quickly and appropriately. To take advantage of this opportunity to discuss concerns, refer to the policy for instructions.

#### Respect employee privacy

The company maintains employee information that is required by law to do business effectively. These records are confidential and the company respects your privacy and your dignity. We will, however, balance this concern for individual privacy with a concern for the dignity, safety and well-being of others.

#### Provide a safe and healthy environment

All facilities are required to have an established safety program that meets all applicable laws, regulations and corporate policies to ensure safe and healthy working conditions. Employees are expected to observe safety and health rules. This includes taking proper health, safety and environmental precautions. Report all accidents, injuries, unsafe practices or conditions to your supervisor or the Integrity Line. Employees are required to report to work free from the influence of any substance that could prevent them from functioning safely and effectively on the job. The company is responsible to take prompt and appropriate action to correct situations.

## **GLOBAL BUSINESS STANDARDS**

### **Responsibilities to our shareholders**

*Within this section, there are five standards regarding responsibilities towards our shareholders:*

- Maintaining accurate business records*
- Acting responsibly*
- Dealing with officials*
- Disclosing financial information*
- Responding to the media or making public statements*

#### Maintaining accurate business records

Steelcase must provide shareholders and other stakeholders with meaningful and adequate financial information. The information follows the rules and regulations of the U.S. Securities and Exchange Commission (SEC) and other regulatory agencies.

Our company uses a system of internal controls over our financial records to ensure that transactions are properly executed and recorded. All company records are regularly audited by internal and external auditors and regulatory agencies. We follow all statutory and regulatory requirements in our financial records, and we obey all the rules of the U.S. federal, state and local governments, and their equivalent authorities in any other country in which we do business.

#### Acting responsibly

Each manager is responsible for maintaining internal controls and for ensuring that his or her function is in compliance with government rules and regulations. When acting on behalf of the company, our employees are expected to act honestly during all transactions. This includes the accurate completion of employee travel expense reports, financial statements and reports. No secret or unrecorded cash funds or other assets will be established or maintained for any purpose.

Concealing or withholding information from management, or the internal or external auditors, is a serious offense. Individuals who are aware of possible falsification or fraudulent activities must report these to the Internal Audit department, Human Resources or Legal Strategies Team, or use the Steelcase Global Business Standards Integrity Line or the Open Door process to inform executive management.

#### Dealing with government officials or legal representatives from other companies

The Steelcase Legal Strategies Team will deal with inquiries by any federal, state, local government or agency and legal representatives from other companies. If an employee is approached for information, he or she should refer the inquiry to the Legal Strategies Team.

If legal papers are served on the company, employees should decline them and direct the person serving the papers to the Legal Strategies Team. Involve your supervisor immediately.

## **GLOBAL BUSINESS STANDARDS**

### Disclosing information about Steelcase Inc. operations

All requests for financial data or information regarding the operations of Steelcase Inc. should be directed to the Investor Relations department. Investor Relations will answer inquiries from investors, security analysts, security trading markets, suppliers, customers, and the public at large regarding Steelcase operations and performance. However, we can only respond to requests that do not violate the laws of the Securities and Exchange Commission.

### Responding to media requests or making public statements

Requests for information from the media should be cleared through the Steelcase Public Relations/Corporate Communications department. Any business information disclosed to the public will be made in accordance with the Steelcase Corporate Communications policies, as well as all applicable laws and regulations.

### Assets

Taking care of our company includes company assets...these are things that belong to the company. From paper clips to machinery, it is our responsibility to save and protect these assets. Doing so protects the company and its financial stability.

### Protecting tangible property

Employees are responsible for safeguarding all company assets under their control. These tangible assets include funds, property, software and records. When required, employees may be asked to provide accurate, auditable records of these assets. Employees must not use any Steelcase funds, property, information, or records for any unauthorized non-business purpose or for personal gain without proper permission. This can be considered theft of company property.

### Protecting intangible property

Our employees are responsible for properly using, conserving and protecting intangible company assets. This includes proprietary business or technical information, patents, brands, trademarks, goodwill, software and other intellectual property.

Employees may not use Steelcase intangible property for any unauthorized non-business purpose or for personal gain without proper permission. Doing so can constitute theft of company property.

Employees may not use the intangible property of other companies (e.g, video, songs, etc.) without obtaining the appropriate approvals. Please contact the Legal Strategies Team for assistance in this area.

## **GLOBAL BUSINESS STANDARDS**

### Protecting proprietary information

Employees may not divulge any confidential company information to any individual or company. There are certain business circumstances in which sharing confidential information is beneficial. However, it is first necessary to consult with the Legal Strategies Team.

This includes employee, financial, product, acquisition, merger, or any sensitive information that could benefit competitors, suppliers, customers or any other individual or entity if made public.

### Avoiding conflicts of interest

Employees must not allow personal considerations or relationships to influence their business-related decisions. Being influenced by family members or close personal relationships is a conflict of interest. Examples include outside financial interests; doing business with relatives; accepting or giving business gifts, money or hospitality.

### Pursuing outside employment

Employees are free to have hobbies, businesses, or other interests outside of the company. However, they must be sure these activities do not conflict in any way with their obligation to Steelcase, and they may not approach coworkers to sell products or promote their hobby or business while working on company time or premises.

### Serving on outside boards

Service to nonprofit organizations is encouraged because it reflects our corporate dedication to the local communities in which we live and do business. Employees may serve as a director of a nonprofit board if it does not pose a potential conflict of interest. To determine if there is a potential conflict of interest, contact the Director of Internal Audit.

In the United States, employees who wish to serve on a for-profit public board of directors must get prior approval from the Director of Internal Audit.

### Avoiding gambling/loan activity

Gambling is not permitted on Steelcase time or property. The company also discourages employee-to-employee loans due to varying laws. In the U.S., for example, some states require individuals to be licensed before making loans or regulate the amount of interest that may be charged.

### Avoiding insider trading

Steelcase is committed to maintaining the confidence of our shareholders and the financial marketplace. The Steelcase Insider Trading policy restricts when our employees can buy and sell Steelcase stock. Employees and members of their households cannot use "non-public information" about Steelcase to their personal advantage nor should they share information with others.

## **GLOBAL BUSINESS STANDARDS**

### **Responsibilities to our customers**

*Within this section, there are three standards regarding responsibilities towards our customers:*

*-Quality, value and innovation*

*-Customer satisfaction*

*-Advertising*

#### Quality, value and innovation

The safety and health of the people who use our products are a primary consideration in our product design and production. We consistently monitor product quality and safety, and we are dedicated to continuous improvement in our products and services.

All of our operating units are responsible for designing, manufacturing and delivering products that, at minimum, conform to the applicable industry standards for product quality and safety prior to sales conducted in that country.

#### Striving for customer satisfaction

We want to ensure our Steelcase dealers and customers are not just "served," but they are truly satisfied with their experiences with our company, dealers and service providers.

#### Advertising

Steelcase will not be a part of false advertising because it is contrary to two of our company's core values: to tell the truth and to act with integrity. We will represent our products and services honestly and factually.

## GLOBAL BUSINESS STANDARDS

### Responsibilities to our business partners

*There are five areas to consider when involving business partners:*

- Fostering good corporate citizenship
- Honoring the Foreign Corrupt Practices Act
- Complying with import/export laws
- Making political contributions
- Participating in restrictive trade processes

#### Fostering good corporate citizenship

We support our local communities in order to improve the quality of life wherever our employees live. The Steelcase Foundation and Steelcase Inc. make cash and furniture donations on a regular basis. Our company provides support for hundreds of organizations in the areas of art and culture, education, environment, health and human services, social welfare, and community and economic development.

We encourage our employees to participate in organizations and projects that benefit their communities. We also encourage our employees to participate in professional or trade associations (with their manager's prior approval) because we believe this will increase their knowledge and improve their performance.

#### Making political contributions

On a personal level, employees may give to any political party, candidate or political action committee. The company will not reimburse employees for political contributions.

#### Honoring the "Foreign Corrupt Practices Act of 1977"

This act is one of the regulations governing Steelcase as a U.S.-based, public multinational company. It requires that Steelcase will not make, or allow payments to be made on its behalf to a foreign government official or an official of a government-owned business in order to obtain, retain or direct business. Such activity is prohibited by the "Foreign Corrupt Practices Act of 1977." That law also requires that accurate records be maintained of all international business transactions. Moreover, similar laws have been, or are in the process of being, enacted in most of the countries in which our company operates and where we do business.

Outside of the United States, such payments, gifts, loans, or services are permitted only if they are legal in the country in question and do not violate U.S. law. Items of this nature must be approved in advance by the appropriate corporate vice president and the Steelcase Legal Strategies Team.

## **GLOBAL BUSINESS STANDARDS**

### Participating in international boycotts or restrictive trade practices

Our company will not participate in, or support, international economic boycotts unless they are sanctioned by the United States. This is prohibited under the U.S. government's anti-boycott laws. Steelcase complies with all current U.S. embargo laws that prohibit exports to certain countries, to the governments of certain countries or to certain private parties. If a situation puts you in legal conflict with the laws of the country in which you are doing business, contact the Steelcase Legal Strategies Team immediately for assistance.

### Complying with import/export laws

Steelcase and its suppliers, agents, dealers and any other business entity supporting Steelcase must comply with U.S. import and export laws and those of countries of origin and destination.

## **GLOBAL BUSINESS STANDARDS**

### **Responsibilities to our worldwide communities**

*These responsibilities address two areas:*

*-Our legacy for ethics*

*-Protecting the environment*

#### We have a legacy for ethics

An "ethical company" obeys the laws of the land and the regulations established for its business or industry. Our employees are expected to act within the law and to honor the spirit behind it. Sometimes our international business operations encounter laws, local customs and social norms that differ from U.S. practice. United States laws that control our business activities outside the U.S. will always override local laws.

We will not do anything that is prohibited by, or inconsistent with, U.S. laws that apply outside the U.S. However, such conflicts are unlikely to be encountered by most employees. Questions of this type should be directed either to the Integrity Line or the Steelcase Legal Strategies Team.

#### Protecting the Environment

Each time we act on our core value to "protect the environment", we make a positive contribution to our employees, customers and community. Our goal is to be proactive and continually incorporate environmental, health and safety considerations into our products, activities and services. We continually strive to meet or exceed all applicable environmental requirements.

Steelcase will not tolerate the willful disregard of environmental, health or safety considerations on company property or when representing the company. We will follow the legal requirements or standards that apply to the countries in which we operate. We will deal professionally, affirmatively and openly with investigating authorities during any compliance inspections in conjunction with the Steelcase Legal Strategies Team.

# The Steelcase Integrity Helpline

---

As a company, we pride ourselves on doing what's right and adhering to ethical business practices. As individuals, we are called on to perform our jobs with honesty and integrity. We're also responsible for speaking up if we are aware of any activity that goes against our values or threatens the company's reputation.

There are several ways to make yourself heard. If you are an employee of Steelcase, the best place to start is with your supervisor or Human Resources representative. If those channels are not available or you prefer to remain anonymous, you can also make a report through our confidential Steelcase Integrity Helpline, which is managed by an outside company. It's available to Steelcase employees and stakeholders around the world.

We have multiple ways for you to communicate your questions or concerns through our Integrity Helpline. If you have an ethical/compliance question or company policy inquiry, you are able to use our new "Ask a Question" feature on [integrity.steelcase.com](https://integrity.steelcase.com). Your question will be handled anonymously and confidentially. You are also able to report an incident on our website if you have a more serious concern that requires further review and investigation. If you would prefer to report your incident over the phone rather than online, the North American phone number is +1.800.437.6167.

Additionally, our website contains a drop-down menu in which you can select your country to locate your country-specific international toll-free number. Multiple language options are also available for some countries. Furthermore, you will find key global policies available on our website for your reference, including our Global Business Standards, HR Policies, Global T & E Policy, and many more.

## **What sort of issues should be reported?**

You should report incidents that you believe represent non-compliance with the law, Steelcase policies or our Core Values, including:

- Abuse, sexual harassment or discrimination
- Conflicts of interest or employee relations
- Corruption or bribery
- Environmental issues
- Inaccurate financial reporting or accounting practices
- Misuse or disclosure of confidential information
- Policy violations or information security concerns
- Safety issues or quality concerns
- Theft, fraud or other dishonest behavior
- Workplace violence or threat of violence

## **What is the process to submit a report?**

The simplest way to report an incident is to submit a report online on [integrity.steelcase.com](https://integrity.steelcase.com). If you choose to do this, you will see that there is a drop-down menu in the upper right-hand corner for language translation if needed. The online submission process consists of three easy steps; first, you will choose among a short list of categories to select the one that best describes the nature of your report. Next, you will be guided through a series of questions that will allow you to further explain and describe your situation. Lastly, you will review your incident prior to submitting.

If you would prefer to report an incident over the phone, the Steelcase Integrity Helpline is available around the clock, every day of the year. It is operated by an independent company that specializes in dealing with workplace concerns and provides language translation. A communication specialist who works for this third-party, not Steelcase, will listen to your concerns and may ask additional questions for clarification. Whether you submit a report online or over the phone, you will be assigned a confidential case number to identify yourself in any follow-up communication.

## **Who handles my report?**

The communication specialist prepares a report that is forwarded to certain leaders at Steelcase (Global Audit, Corporate Security, and Legal Strategies) for review, investigation and action. Steelcase then posts a response to the Integrity Helpline system regarding the outcome of the incident, so you will be able to find out the status of your concern if you choose to check your report status online or over the phone.

## **Can I remain anonymous?**

In many countries, you are not required to give your name when submitting an online concern or calling the Integrity Helpline. If you choose to identify yourself, your information will be handled with as much confidentiality as possible. Steelcase employees will never be retaliated against for reporting their suspicions in good faith. However, certain countries do not allow the option of anonymity due to local rules and regulations. In these cases, Steelcase employees will be required to identify themselves in order to report their incident.

### **Steelcase Integrity Helpline Website**

[Integrity.steelcase.com](http://Integrity.steelcase.com)

### **U.S. Toll Free Integrity Line**

1.800.437.6167 (English, Spanish, French, German, Mandarin)

### **International Toll-Free Integrity Lines**

Germany 0-800-181-5083 (German, English, Spanish, French, Mandarin)

France 0805-080566 (French, English, Spanish, German, Mandarin)

Mexico 01-800-681-9511 (Spanish and English)

Malaysia 00-800-1777-9999 (Malay and English)

### **International Integrity Lines (Offer native language and English translation)**

Australia 1-800-763-983

Azerbaijan 1-720-514-4400

Belgium 0800-260-39

Brazil 55-2120181111

Canada 1-800-235-6302

China 400-120-3062 or 00-800-1777-9999

Croatia 1-720-514-4400

Czech Republic 800-701-383

Hong Kong 800-906-069

Hungary 00-800-1777-9999

India 000-800-100-4175

Israel 00-800-1777-9999

Italy 00-800-1777-9999

Japan 0800-170-5621

Macau 00-800-1777-9999

Malaysia 00-800-1777-9999

Netherlands 00-800-1777-9999

Poland 00-800-141-0213

Portugal 00-800-1777-9999

Romania 0-800-360-228

Russian Federation 8-800-100-9615

Saudi Arabia 966-8111072514

Singapore 800-852-3912

South Africa 001-800-1777-9999

South Korea 080-808-0574

Spain 00-800-1777-9999

Sweden 00-800-1777-9999

Switzerland 00-800-1777-9999

Turkey 00-800-113-0803

UAE 8000-3570-3169

United Kingdom 0-808-189-1053