

# Steelcase Supplier Code of Conduct

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## Our Vision

At Steelcase we believe that businesses can be successful, in fact can thrive, only where there exists a healthy balance of focus and concern for people and the environment. We also believe that conscientious businesses must take an active role in promoting healthy practices and eliminating unhealthy work and environmental practices.

Whether these requirements are new to you or not, we value our relationship with you and we expect that you will join us on this journey.



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# Introduction

The Steelcase Supplier Code of Conduct (Code) is intended to explain Steelcase Inc.'s commitment, actions and expectations in relation to the social and environmental responsibility of our supply chain.

## Scope

This Code is a total supply chain initiative. We expect our suppliers to comply with this Code and to require the suppliers in their supply chain to comply with this Code. In this Code, "suppliers" mean the suppliers who provide products and/or services directly to us and each of the suppliers within their respective supply chains that contribute to our supply chain.

## Foundation of this Code

### Core Values

We take pride in conducting business with a high level of integrity and ethics. Our longstanding core values, shown below, reflect the principles of our founders and are the basis for this Code:

- Act with integrity
- Tell the truth
- Keep commitments
- Treat people with dignity and respect
- Promote positive relationships
- Protect the environment
- Excel

### Guiding Principles

In addition to our core values, we considered many other points of reference in the creation of this Code including, but not limited to, those listed below. These served as points of reference in developing this Code, but this Code does not necessarily implement all of the elements within each of these documents.

- Applicable laws and regulations
- ISO 26000 Guidance on Social Responsibility
- International Bill of Human Rights
- International Labour Organization (ILO) International Labor Standards
- ILO Code of Practice in Safety and Health
- The United Nations Global Compact
- The Electronic Industry Code of Conduct
- OHSAS 18001
- ISO 14000
- Steelcase Global Business Standards
- The requirements and requests of our customers

## Applicable Legal Requirements

Suppliers are expected to comply with applicable laws and regulations. This Code is not intended to conflict with any legal or regulatory requirements that otherwise apply to suppliers. In the event that compliance with this Code would result in violation of an applicable law or regulation, suppliers should comply with the requirements of the applicable law or regulation.

# Supplier Performance Requirements: Organizational Governance

Strong leadership of the governance process is critical to the successful integration of social and environmental responsibility into the culture of an organization.

## Management Commitment

Suppliers will have social and environmental responsibility policy statements affirming their commitment to compliance and continual improvement endorsed by executive management.

## Documentation and Records

Suppliers will have processes to identify, monitor, understand and comply with applicable laws and regulations and this Code. Suppliers will obtain, maintain and keep current a valid business license and/or permits as required by applicable laws and regulations. Suppliers will keep appropriate documents and records to ensure regulatory compliance and conformity to this Code. Documents and records will be made available for inspection upon request by Steelcase or a third-party auditor assigned by Steelcase.

## Supplier Assessment

In pursuit of our common goals, Steelcase reserves the right to visit (and/or send a third-party representative to), announced or unannounced, facilities of suppliers that contribute to Steelcase's supply chain to assess performance against this Code. Suppliers are responsible for ensuring that their suppliers contributing to Steelcase's supply chain are adhering to this Code. Failure to perform in accordance with this Code and expectations will impact our business relationship and may result in termination as a Steelcase supplier.

## Risk Assessment and Management

Suppliers are expected to identify, assess and mitigate risks that are covered by this Code and associated with their operations.

## Training

Suppliers will provide training for managers and workers involved in the implementation of the policies, procedures and improvement objectives related to this Code and to applicable legal and regulatory requirements.

## Improvement Objectives

Suppliers will have written objectives, targets and implementation plans to improve their social and environmental responsibility performance, including a periodic self-assessment of progress made.

## Management Accountability and Responsibility

Suppliers are expected to establish appropriate management accountability and responsibility to ensure conformance with this Code.

## Worker Feedback and Participation

Suppliers must periodically assess employees' understanding of this Code and obtain feedback on practices and conditions covered by this Code to foster continuous improvement.

## Corrective Action and Transparency

Any deficiency must be promptly reported using the Steelcase Integrity Helpline at [integrity.steelcase.com](https://integrity.steelcase.com)

# Supplier Performance Requirements: Human Rights

Human rights are inherent, inalienable, universal, and interdependent, and every organization has a responsibility to respect and contribute to their fulfillment.

## Diversity

Suppliers are expected to have a comprehensive commitment throughout their organization to build a culture of inclusion of all backgrounds without regard to gender, ethnicity, religion or other statuses.

## Fair Treatment and Non-discrimination

Suppliers commit to giving all employees the right to work in an atmosphere that is free from intimidation, threats, hostility, violence, harassment or disruptions to another's work performance. In addition, suppliers will encourage their employees to promptly report discriminatory behavior or harassment. Suppliers will not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status. In addition, suppliers will not use medical test results to discriminate against employees or potential employees.

## Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. However, suppliers must respect the right of workers to associate freely, form and join workers' organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Workers will be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

# Supplier Performance Requirements: Labor Practices

Individuals have the right to employment that is voluntary, safe, fairly compensated and protective of human dignity.

## Involuntary Labor

Suppliers will not use any form of forced, indentured, or involuntary labor. All labor must be voluntary and workers will be free to leave work or terminate their employment with reasonable notice. Suppliers will not participate in human trafficking or use slave labor in any part of their organization or supply chain.

## Underage Labor

Suppliers will not use child labor in any part of their organization or supply chain. The term “child” refers to any person under the age of 15 (or 14 where law of the country permits), under the minimum age for employment in the country of employment, or under the age for completing compulsory education, whichever is greatest. We support the use of legitimate apprenticeship programs that are in compliance with local laws and regulations.

## Working Hours

Hours of work for individual employees at a supplier are not to exceed the maximum set by local law. Further, a workweek will not routinely be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers will regularly be allowed at least one day off per seven-day week.

## Wages and Benefits

Suppliers will pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers will be compensated for overtime hours at no less than the rate required by applicable laws and regulations. Deductions from wages as a disciplinary measure will not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar notification.

# Supplier Performance Requirements: Labor Practices (continued)

## Health and Safety

Integrating sound health and safety management practices is necessary to create and maintain safe working conditions and a healthy work environment for all of their workers.

### Physical Injury Prevention

Suppliers will eliminate or minimize physical hazards where possible and will provide workers with appropriate personal protective equipment. Workers will not be disciplined for raising safety concerns and will have the right to refuse unsafe working conditions without fear of reprisal.

### Prevention of Chemical Exposure

Suppliers will identify, evaluate, and control worker exposure to chemical, biological, and physical agents. Suppliers will eliminate such hazards where possible. Where such hazards cannot be eliminated, suppliers will provide appropriate measures to mitigate the risks.

## Occupational Safety Procedures and Systems

Suppliers will establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems will encourage workers to report any occupational injury or illness. Suppliers will classify and record work-related injury and illness cases, investigate cases and implement corrective actions to eliminate their causes. Suppliers will also provide necessary medical treatment and facilitate the employees' return to work.

## Health and Safety Communication

In order to foster a safe work environment, suppliers will provide workers with appropriate workplace health and safety information and training, including written health and safety information and warnings in the language required by applicable laws and regulations. Additionally, suppliers are encouraged to provide this information in the primary language of the workers. Suppliers will post Safety Data Sheets for hazardous or toxic substances and properly train workers who may come into contact with such substances in the workplace.

## Emergency Preparedness

Emergency situations and events are to be identified and assessed by suppliers, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

## Physically Demanding Work

Suppliers must identify, evaluate and control worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.

## Sanitation, Food, and Housing

Suppliers must provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation and eating facilities where applicable. Worker dormitories provided by the supplier or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, reasonable personal space and reasonable entry and exit privileges.

# Supplier Performance Requirements: The Environment

## Hazardous Substance Management and Restrictions

To ensure safe handling, movement, storage, recycling, reuse, and disposal, suppliers will identify and manage substances that pose a hazard if released to the environment and at a minimum, comply with applicable labeling laws and regulations for recycling and disposal.

## Solid and Hazardous Waste Management

Wastewater, solid waste, liquid waste and hazardous waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated at least in accordance with applicable laws and regulations.

## Airborne Emissions Management

Suppliers will characterize, monitor, control and treat airborne emissions, as required by applicable laws and regulations at a minimum, before and/or upon discharge.

## Environmental Permits and Reporting

Suppliers must obtain, maintain, and keep current all required environmental permits (e.g., discharge monitoring) and registrations, and follow the operational and reporting requirements of such permits.

## Pollution Prevention and Resource Reduction

Suppliers will use reasonable means to reduce waste of all types, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation and recycling and reusing materials. Steelcase encourages suppliers to take part in local water boards when available to bring awareness to potential water quality and quantity issues common in their watershed.

# Supplier Performance Requirements: Fair Operating Practices

the rights of individuals, organizations, and governments.

## Business Integrity

Suppliers must be committed to high standards of ethical conduct when dealing with organizations such as customers, suppliers, governmental agencies, non-governmental organizations (NGOs) and competitors. Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers will not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers will not violate the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate.

## Disclosure of Information

Suppliers will disclose information regarding business activities, structure, financial performance, and social and environmental responsibility data when requested by Steelcase in addition to disclosures required by applicable laws and regulations.

## Intellectual Property

Suppliers will respect intellectual property rights; the transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

## Whistleblower Protection

Suppliers will maintain programs that ensure the confidentiality and protection of any employee who makes a disclosure about a violation of this Code. Suppliers and their employees are invited to use the Steelcase Integrity Helpline to report to Steelcase any instances of violations of this Code or other inappropriate behavior. In most jurisdictions, these reports can be made anonymously to the third party that manages our Integrity Helpline. More information on the Steelcase Integrity Helpline can be found at [integrity.steelcase.com](http://integrity.steelcase.com)

## Responsible Sourcing of Minerals

Suppliers will ensure that the products, components and materials they sell to us which are incorporated into the products we sell or resold by us do not contain any tantalum, tin, tungsten or gold which originate in the Democratic Republic of the Congo or an adjoining country and directly or indirectly finance or benefit armed groups. Suppliers shall (1) establish a due diligence process to ensure compliance with this requirement through their supply chains, and (2) provide us with information regarding the source and chain of custody of any such minerals in their products upon our request.

# Supplier Performance Requirements: Consumer Issues Community Involvement and Development

The protection of the consumer is an integral part of conducting business in an ethical way.

## Fair Business, Advertising and Competition

Suppliers will uphold fair business standards in advertising, sales and competition. Additionally, appropriate means to protect customer information must be available.

## Product Content Restrictions

Suppliers will adhere to applicable laws and regulations regarding the prohibition or restriction of specific substances, including labeling for recycling and disposal.

## Community Involvement and Development

Suppliers are urged to improve the communities in which you operate by promoting human rights through the improvement of economic, environmental and social conditions, and encouraging your suppliers to do the same.

Suppliers are encouraged to develop an understanding of the cultures, customs and values that prevail in your local communities by developing an inclusive and open dialogue with the people affected by your operations.

This document is available as a PDF download through [www.steelcase.com](http://www.steelcase.com) .