

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, planet and culture. We also believe that conscientious businesses must take an active role in promoting healthy environmental, social and governance 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 environmental, social and governance responsibility of members of our value chain.

Scope

This Code applies to our total value chain. We require our Suppliers to comply with this Code and to require those who contribute to our value chain through them to comply with this Code. This Code applies to direct and indirect purchases of goods and services and other elements of our value 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 standards in creating this Code including, but not limited to, those listed in the Appendix. These served as points of reference in developing this Code but are not necessarily incorporated in all aspects.

Applicable Legal Requirements

Suppliers are expected to comply with applicable laws, regulations and other widely adopted norms like the UN Global Compact. This Code is not intended to conflict with any legal or regulatory requirements that otherwise apply to Suppliers. If 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.

Achieving the requirements of this Code is a dynamic process and we encourage continuous improvement efforts. This Code is a general statement of Steelcase's expectations with respect to its Suppliers. This Code should not be read in lieu of but in addition to any Supplier obligations set forth in any request for proposal or other agreements with Steelcase.

Supplier Performance Requirements: Organizational Governance

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

Management Commitment

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

Documentation and Records

Suppliers are required to have processes to identify, monitor, understand and comply with applicable laws, regulations, other widely adopted norms, such as the UN Global Compact and this Code. Suppliers will obtain, maintain and keep current a valid business license and necessary 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 value chain to assess performance against this Code or other agreements with Steelcase. Steelcase may ask Supplier to respond to third party questionnaires or other information gathering efforts regarding compliance with this Code as part of Steelcase's due diligence process.

Suppliers are responsible for putting in place requirements for their own Suppliers in line with this Code, and adequately monitoring their Suppliers contributing to Steelcase's products or services to demonstrate compliance with 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 and those of their Suppliers.

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 environmental, social and governance responsibility performance, including a periodic self-assessment of progress made consistent with Steelcase guidance documents.

Supplier Performance Requirements: Organizational Governance

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 significant deficiency must be promptly reported to Steelcase through your Supply Management contact. Suppliers are also invited to use the Steelcase Integrity Helpline at integrity.steelcase.com. The Integrity Helpline allows Suppliers, their employees or other Value Chain participants to submit information anonymously through a third party. It is available globally and can be accessed by phone or email. The third party submits reports to Steelcase while maintaining reporter confidentiality. Steelcase will investigate all reports to the Integrity Helpline and is committed to avoiding retaliation against reporters.

Supplier Performance Requirements: Human Rights

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

Diversity, Equity & Inclusion

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 protected status. At Steelcase, diversity is much more than gender, race, or other protected class, status or characteristic; it is the intentional desire for a mix of people with different traits, experiences and opinions that are both inherent and acquired. It is the intentional desire for diversity of thought. It is an extension of our core values – including treating people with dignity and respect throughout their careers. We embrace diversity, ensure equitable access to opportunity, and foster a culture of inclusion where our employees can be authentic and thrive throughout their journey with the Company. We extend this commitment to our Suppliers and value chain.

Fair Treatment and Non-discrimination

Suppliers will protect the rights of all employees, including women and underrepresented groups, by providing equal employment opportunities, ensuring their company's employment practices are free of discrimination and giving all employees a work environment that is free from intimidation, threats, hostility, inhumane treatment, violence, and harassment. In addition, Suppliers will encourage their employees to promptly report discriminatory behavior or harassment and protect reporters from retaliation. Suppliers will not engage in discrimination based on race, color, ethnicity, nationality or social origin, ancestry, sex, gender identity or expression, sexual orientation, language, age, disability, medical condition, health status, physical appearance, pregnancy, marital or familial status, alienage or citizenship status, religion/creed, political or other affiliation, genetic information, military or veteran status, place of residence, economic or social situation, victim status or other characteristic.. 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. 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 in an environment based on open, two-way communication between employees, leaders, and management, where employees find their voice and leaders and management listen and practice empathy.

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 slave, prison, forced, indentured, or involuntary labor in any part of their organization or value chain. All labor must be voluntary, and workers will be free to leave work or terminate their employment with reasonable notice. Suppliers or other third parties shall not charge illegal fees and deductions during recruitment and employment and shall not restrict workers' freedoms such as by withholding personal documents or limiting workers' movement.

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, or the limit established by local law, per week, including overtime, except in emergency or other unusual situations, if allowed by local law. Workers will 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.

Underage Labor

Suppliers will not use child labor in any part of their organization or value chain. The term "child" refers to any person under the minimum age for full time 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.

Supplier Performance Requirements: Labor Practices (continued)

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

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 workers. Suppliers will comply with all applicable laws and regulations on the health and safety of their employees and will not retaliate against workers who raise health and safety concerns.

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 wherever possible. Where such hazards cannot be eliminated, Suppliers will provide appropriate measures to mitigate the risks and effective response and treatment plans if an exposure occurs.

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 or languages required by applicable laws and regulations. Additionally, Suppliers are encouraged to provide this information in any other primary language of their workers. Suppliers will post Safety Data Sheets or the local equivalent for hazardous or toxic substances and properly train workers who may come into contact with such substances in the workplace.

Emergency Preparedness

Potential 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 and work to reduce or eliminate these conditions.

Supplier Performance Requirements: Labor Practices (continued)

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

Sanitation, Food, and Housing

Suppliers must provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation and eating facilities. These facilities must be adequate to the number of workers on site and incorporate cultural and gender sensitivities allowing for separation and privacy. If worker dormitories are provided by the Supplier or a labor agent, they must be kept 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. Where applicable, workers must be free to choose whether to reside in company provided dormitories or not.

Supplier Performance Requirements: The Environment

Organizations should strive to impact the environment in a positive way.

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. Suppliers will cooperate with Steelcase in identifying and reducing or eliminating the use of materials of concern including maintaining compliance with chemical content standards including but not limited to ROHs, REACH, Level, Conflict Minerals, Mindful Materials and other material-based programs.

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.

Science Based Targets for Emission Reductions

Steelcase has committed to meeting Science Based Targets validated by SBTi to measure its progress towards reducing emissions contributing to climate change. An important element of this process is working with Suppliers on their own emission reduction commitments. Over time, Steelcase will assess Supplier commitments to Science Based Targets.

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 maximizing recycling and reusing materials. Steelcase encourages Suppliers to take part in local water boards or other water use organizations when available to bring awareness to potential water quality and quantity issues common in their watershed.

Supplier Performance Requirements: Fair Operating Practices

Protecting the rights of individuals, organizations, and meeting government requirements.

Business Integrity

Suppliers must be committed to high standards of ethical conduct when dealing with organizations such as customers, other Suppliers, governmental agencies, non-governmental organizations (NGOs) and competitors. Bribery, 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, OECD and other international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate.

Data Protection and Security

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. Suppliers will have robust cyber security processes and controls in place to provide reasonable protection of data, personal, proprietary and confidential information, including information that they access, receive or process on behalf of Steelcase. In addition, Suppliers must comply with all applicable privacy / data protection and information security laws and regulations. Unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for Steelcase

and for individuals whose personal information is involved. All actual or suspected privacy breaches, security breaches, or losses of our information require prompt notification.

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. Suppliers will not copy products protected by intellectual property rights and will inform Steelcase of any attempts to copy Steelcase products of which they become aware.

Competition and Anti-Trust Compliance

Suppliers must comply with applicable anti-trust and competition laws. Suppliers will not engage in collusive bidding or bid-rigging, price-fixing, boycotts, market allocation or other anti-competitive behavior.

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 or applicable laws or regulations. Suppliers, their employees and others in their value chain are invited to use the Steelcase Integrity Helpline to report to

Steelcase any instances of violations of this Code or other inappropriate behavior. 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

Supplier Performance Requirements: Fair Operating Practices

It is the responsibility of an organization to conduct business in a manner that respects the rights of individuals, organizations, and governments.

Responsible Sourcing of Minerals and Other Materials

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 and cooperate with Steelcase by providing information for Conflict Minerals reporting. Suppliers shall also (1) establish a due diligence process to ensure compliance with other material sourcing programs, such as wood sourcing, through their supply chains, and (2) provide Steelcase with information regarding the source and chain of custody of any such materials in their products upon our request.

Supplier Performance Requirements: Consumer Issues

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 private customer information must be maintained as well as data security measures meeting industry and regulatory standards.

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.

Supplier Performance Requirements: Community Involvement and Development

Protecting the rights of individuals, organizations, and meeting government requirements.

Community Involvement and Development

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

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

Appendix

- 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 Responsible Business Alliance Code of Conduct
- OHSAS 18001
- ISO 14000
- Steelcase Global Business Standards
- The expectations of our customers and stakeholders.

This document is available as a PDF download through www.steelcase.com