

CONFLICT MINERALS POLICY

Steelcase Inc. Policy on the Use of Conflict Minerals

This Policy is intended to explain Steelcase Inc.'s expectations in relation to the presence of conflict minerals in our products. This Policy applies to all purchases that are incorporated into the products we sell or which are resold by Steelcase Inc. and its consolidated subsidiaries.

Steelcase intends to refrain from purchasing products, components or materials containing any DRC Conflict Minerals (as defined below) which (1) originate in the Democratic Republic of the Congo or an adjoining country (as defined below) and (2) directly or indirectly finance or benefit armed groups. This requirement does not extend to any DRC Conflict Minerals which are obtained from recycled or scrap sources or DRC Conflict Minerals which are not necessary to the functionality or production of our applicable product.

We expect our suppliers to ensure that the products, components and materials they sell to us will not contain any such DRC Conflict Minerals and to establish appropriate due diligence programs to ensure compliance with this requirement through their supply chains. We expect our suppliers to provide us with information regarding the source and chain of custody of any DRC Conflict Minerals in the products, components and materials they sell to us upon our request.

As used in this Policy:

DRC Conflict Minerals means (1) columbite-tantalite (coltan), cassiterite, gold and wolframite, (2) their derivatives, which are limited to tantalum, tin and tungsten, and (3) any other minerals or derivatives which the U.S. Secretary of State determines to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

Adjoining country means any country that shares an internationally recognized border with the Democratic Republic of the Congo, which currently includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

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