

California Transparency in Supply Chains Act of 2010 Disclosure

At Steelcase, we recognize that our business has an impact on social issues, in particular the working conditions of our employees and suppliers, as well as the environment, both locally and globally. We also strongly believe that it's not enough to be profitable, we must also be responsible. Steelcase is committed to supporting and furthering the implementation of internationally recognized human rights and seeks to avoid complicity in human rights abuses. We have longstanding core values that reflect the principles of our founders and are at the heart of what guides our business today.

Specifically, these global corporate core values are:

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

Our core values are reflected in our Global Business Standards, which embody the fundamental principles that govern our ethical and legal obligations as we do business around the world. These standards pertain not only to conduct within our company but also to conduct involving our customers, dealers, suppliers and other stakeholders. Our employees are trained on our Global Business Standards, and adherence to our core values is part of the annual performance review of each employee. We maintain an Integrity Line, which is operated globally by an independent third party, for employees to anonymously report situations involving suspected non-compliance with laws, regulations, Steelcase policies or our core values.

We are committed to doing business with suppliers that share our vision and ambition, and we have adopted the Steelcase Supplier Code of Conduct which sets forth our commitments, actions and expectations in relation to the social and environmental responsibility of our supply chain. We expect our suppliers to be aligned with us by implementing sound environmental and social responsibility practices and providing a safe, healthy and fair workplace for their employees that supports our business globally. At a minimum, we require that our suppliers comply with applicable laws and regulations, as well as encourage them to implement best practices where possible and practical to improve social and environmental conditions. We select suppliers based on many attributes such as quality, technical competence, ability to support us through innovation, capacity to deliver on time, price, and their ability to support our corporate environmental and social responsibility goals.

Our efforts on corporate social responsibility include a prohibition on the use of child labor and forced labor. One way that Steelcase adheres to its core values is by not conducting ongoing business with suppliers that use child labor or forced labor. We utilize a number of processes and procedures in the selection and monitoring of suppliers, which are employed through our global supply chain, applying scrutiny and oversight through a risk-based approach considering factors such as the nature of the goods or services being purchased, the geographic location of the supplier and the amount of anticipated purchase volume with the supplier. These processes and procedures include the following:

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- written certification from the supplier that they are in compliance with, and will continue to comply with, applicable laws and regulations and the Steelcase Supplier Code of Conduct in the performance of our relationship.
- on-site and announced supplier visits to assess compliance with our supplier requirements. Such visits are generally conducted by our employees, and we have also utilized third party verification in limited instances.

We investigate and assess any suspected instances of child or forced labor against our core values and our commitment that we do not allow the use of child labor or forced labor in the production of our products. In the event that such abuses are discovered, we would require the supplier to correct such abuses or we would discontinue doing business with them. We do not currently have a specific training program for employees who have direct responsibility for supply chain management on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products. We have trained our employees that have direct responsibility for supply chain management and our strategic suppliers in the requirements of the Steelcase Supplier Code of Conduct. To date, we have not encountered any known instances of human trafficking or slavery within our supply chain, so our internal accountability standards and procedures for employees or contractors failing to meet our standards regarding human trafficking and slavery have been informal and such situations would be handled on a case-by-case basis.

We have implemented a process that formally manages suppliers regarding social responsibility expectations for our supply chain, which includes the following areas:

- employee education,
- supplier education,
- risk assessment,
- verification and monitoring on an on-going basis our suppliers' ability to meet our expectations,
- reporting systems and
- escalation and governance procedures.