STEELCASE INC. CODE OF ETHICS FOR CHIEF EXECUTIVE AND SENIOR FINANCIAL OFFICERS

Adopted as of March 27, 2004

Acting with integrity is the cornerstone of Steelcase's business philosophy. As a part of that philosophy, employees are expected to conduct their business activities and relationships with personal and professional integrity, as well as in compliance with all applicable laws, rules and regulations.

The Company's Chief Executive Officer and Senior Financial Officers (which includes the Chief Financial Officer, Controller, and any other person performing similar functions) are expected to comply with the standards outlined below.

As the Chief Executive Officer or a Senior Financial Officer, you agree that:

- 1. It is critical that you engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. The Company's policy on conflicts is detailed in its separate conflicts of interest policy. In general, the policy prohibits any investment, accepting any position or benefits, participating in any transaction or business arrangement or otherwise acting in a manner that creates a conflict of interest.
- Your leadership responsibilities include: creating a culture of honest and ethical business conduct and commitment to compliance; maintaining a work environment that encourages employees to raise concerns; and appropriately addressing employee compliance concerns.
- 3. You will adhere to and promote compliance with the Company's policy of making full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in all other public communications made by the Company.
- 4. You will comply with the laws, rules and regulations that govern the conduct of our business.
- 5. You must immediately report any known or suspected violation of applicable laws, rules or regulations or this Code of Ethics to the Chair of the Nominating and Corporate Governance Committee. *No one will be subject to retaliation because of a good faith report of a suspected violation*.

Some situations, such as conflicts, may not always be clear-cut. If you believe there may be a potential conflict of interest or that a proposed course of action, transaction or other circumstance may constitute a violation of this Code, you must consult with the Chair of the

Nominating and Corporate Governance Committee of the Steelcase Inc. Board of Directors, who must give prior written approval before you undertake any action. Similarly, any questions regarding potential conflicts or violations of this Code that a member of the Board of Directors has regarding your conduct will be discussed with you prior to reaching any conclusion.

Violations of this Code of Ethics may result in disciplinary action, up to and including termination of employment. The Nominating and Corporate Governance Committee of the Board of Directors shall determine, or shall designate appropriate persons to determine, appropriate action in response to violations of this Code.

If you would like to seek a waiver of the Code of Ethics, you must make full disclosure of your particular circumstances to the Nominating and Corporate Governance Committee. Amendments to and waivers of this Code of Ethics will be publicly disclosed as required by applicable law and regulations.

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