



# **Steelcase's Report on Combating Forced Labour and Child Labour in Supply Chain**

**FY 2025 reporting**



## FOREWORD

Steelcase is committed to responsible business practices and ethical sourcing. The company has a Supplier Code of Conduct that outlines its expectations of suppliers to adhere to strict policies against forced or compulsory labour and any other forms of human rights abuses.

Steelcase works closely with its suppliers to ensure that they respect the rights of workers and operate in accordance with local and international labour laws and regulations. The company requires suppliers to verify that all labour is voluntary and that workers are free to leave their employment at any time or terminate their employment with reasonable notice.

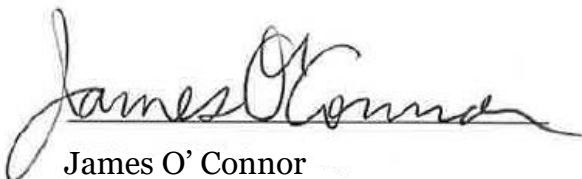
Steelcase conducts regular assessments of its suppliers' compliance with its Code of Conduct and works with suppliers to address any areas of non-compliance. The company also collaborates with other organizations and stakeholders to promote fair labour practices and respect for human rights in the global supply chain.

Steelcase has a zero-tolerance policy for any forms of forced or compulsory labour or any other human rights violations. Suppliers who are found to be in violation of Steelcase's policies and Code of Conduct risk losing their status as a Steelcase supplier.

This report is made to pursuant the Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. It covers activities of Steelcase Inc and Steelcase Canada for the fiscal year starting on March 1, 2024, and ending on February 28, 2025.

The Corporate Compliance Officer of Steelcase Inc approved this report, per Paragraph 11(4)(b)(i) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act on April 30, 2025.

Signed by:



James O' Connor

Vice President, Corporate Compliance Officer

Date: 14 May 2025

I have the authority to bind Steelcase Inc and Steelcase Canada.

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## 1. INTRODUCTION

Steelcase Inc. (38-0819050) and Steelcase Canada (105007801RM0002) gives the Forced Labour and Child Labour in Supply Chain Statement pursuant to Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c.9. Steelcase Inc. is a global office furniture manufacturing company headquartered in Grand Rapids, USA. Steelcase Canada is a subsidiary of Steelcase Inc. incorporated in Canada, located in Toronto, Ontario. References in this statement to "we", "us", "our" or Steelcase are references to Steelcase Inc. and Steelcase Canada.

At Steelcase, acting with integrity and treating people with dignity and respect are key principles that have guided our individual and corporate business thinking, decisions, and behavior for over 100 years. It is a legacy handed down from the founders of our company and remains the cornerstone of our business philosophy today.

Steelcase's core values are reflected in our Global Business Standards, which embody the fundamental principles that govern the company's ethical and legal obligations around the world. These standards pertain not only to conduct within Steelcase but also to conduct involving customers, dealers, suppliers, and other stakeholders.

Steelcase core values:

- We act with integrity
- We treat people with dignity and respect
- We work better when we work together
- We hold ourselves and each other accountable
- We work toward better futures for people and the planet

To learn more about Steelcase's core values, please visit <https://www.steelcase.com/resources/documents/global-business-standards/>

## 2. OUR MEASURES TAKEN TO FIGHT AGAINST FORCED LABOUR AND CHILD LABOUR IN OUR SUPPLY CHAIN

Steelcase's core values are reflected in our Global Business Standards, which embody the fundamental principles that govern the company's ethical and legal obligations around the world. These standards pertain not only to conduct within Steelcase but also to conduct involving customers, dealers, suppliers, and other stakeholders.

Steelcase conducted a regular risk-based assessment to assess our supply chain in various perspectives, including but not limited to forced labour and child labour, environmental risk, sanctions, exports control, and political exposure. This measure can be served as a prevention strategy for Steelcase to be alert on any potential risk appear in our supply chain.

### 2.1 GLOBAL POLICY INTEGRATED IN STEELCASE'S PRINCIPLES AND POLICIES

Our approach to respecting human dignity and advancing human and labour rights across the globe incorporates international laws, principles, conventions, and norms, as well as internal Steelcase principles and policies, including:

- the International Bill of Human Rights
- the ILO Declaration on Fundamental Principles and Rights at Work (ILO)
- the United Nation's Universal Declaration of Human Rights
- the United Nations Guiding Principles on Business and Human Rights
- the OECD Guidelines for Multinational Enterprises
- the UN Global Compact, to which we are a signatory
- the IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards
- good governance principles
- the Rule of Law
- our company vision
- our core values
- our Global Harassment Prevention Policy
- our Global Business Standards
- our Supplier Code of Conduct, and
- this Global Human and Labor Rights Policy

This Global Human and Labour Rights Policy describes Steelcase's commitment to respect and promote global human and labour rights in accordance with the laws,

principles, conventions, norms and internal principles and policies enumerated above and is applicable to all employees, worldwide. It's also applicable, to the extent appropriate, to our business partners, suppliers, dealers, and vendors.

For more information on Steelcase's principles and policies on human rights, please visit <https://www.steelcase.com/global-human-labor-rights-policy/>

## 2.2 EMPLOYMENT AND LABOUR PRACTICES IN OUR VALUE CHAIN

### 2.2.1 Involuntary Labour

Steelcase does not participate in human trafficking or use slave labour in any part of its organization or supply chain. All labour is voluntary, and workers are free to leave work or terminate their employment, as desired. We prohibit workers from being forced to pay for their jobs or to become indebted to third parties as a result of the process of securing employment. Should any such violations of workers' rights occur, Steelcase will seek to mitigate the negative impacts on workers.

For more information on Steelcase's commitment towards Involuntary Labour, please visit <https://www.steelcase.com/global-human-labor-rights-policy/>

### 2.2.2 Underage Labour

Steelcase does not use child labour in any part of its organization or supply chain. We support the use of legitimate apprenticeship programs that comply with local laws, regulations, and norms.

For more information on Steelcase's commitment towards Underage Labour, please visit <https://www.steelcase.com/global-human-labor-rights-policy/>

### 2.2.3 Occupational Safety Procedures and Systems

Steelcase has procedures and systems to manage, track and report occupational injury and illness. We encourage employees and Visitors, as applicable, to report any occupational injury or illness. Steelcase classifies and records all work-related injury and illness cases, investigates those cases, and implements corrective actions to eliminate their causes. Steelcase provides medical treatment or ensures employees' access to public and/or additional health coverage and facilitates the employees' return to work.

For more information on Steelcase's Occupational Safety Procedures and Systems, please visit <https://www.steelcase.com/global-human-labor-rights-policy/>



#### 2.2.4 Health and Safety Communication

Steelcase provides employees and Visitors with appropriate workplace health and safety information, warnings and training in both the languages required by applicable laws and regulations, as well as local languages understood by employees but not required by local law. Steelcase makes available to employees Safety Data Sheets for hazardous or toxic substances used in our facilities and properly educates employees who may encounter such substances in the workplace.

For more information on Steelcase's Health and Safety Communication, please visit <https://www.steelcase.com/global-human-labor-rights-policy/>

#### 2.2.5 Employee Training

All employees play an important role in taking accountability for understanding unacceptable behaviors and addressing potentially harmful situations. To guide this effort, we created the Global Harassment Prevention Policy. It underlines our zero-tolerance policy on harassment. In addition, we created a learning course, "Global Harassment Prevention Training: Creating and Maintaining a Respectful Environment," to illustrate the behaviors and scenarios we should all recognize as harassment. We also created our Global Human and Labor Rights Policy, following global human rights conventions.

For more information on Steelcase's Global Human and Labor Rights Policy, please visit <https://www.steelcase.com/global-human-labor-rights-policy/>

### 2.3 SUPPLIER AND DEALERS

#### 2.3.1 Supplier Code of Conduct

Steelcase is continuously committed to identifying, verifying, and addressing risks related to forced labour and child labour within our supply chain, in alignment with our human rights values and our commitment to operating as a sustainable business.

Our approach begins with embedding our expectations into supplier contracts, which are aligned with and form part of our **Supplier Code of Conduct**. At Steelcase, we regularly update the Supplier Code of Conduct to reflect evolving global regulations and industry best practices.

As of this reporting period, 92.25% of our direct spend suppliers have formally signed contracts and are in adherence with the company's policies.

Steelcase remains committed to continuously strengthening our Supplier Code of Conduct to ensure it reflects current local regulations and responds to evolving global conditions.

For more information about Steelcase's Supplier Code of Conduct, please visit <https://www.steelcase.com/resources/documents/supplier-code-conduct/>

### 2.3.2 Supplier Vetting Software

To enhance the identification of risks within our supply chain, Steelcase implemented a supplier vetting software solution to assess our scorecard suppliers using a risk-based approach. This tool enables us to screen materials, and the upstream supply chain of suppliers up to 5 tiers for potential involvement in forced or child labour, sanctions, export controls, regulatory action, and political exposure. This process and tool will put Steelcase in a position to proactively identify and mitigate potential ethical and legal issues within its supply chain. By leveraging this tool, Steelcase can ensure compliance with international regulations, uphold its commitment to corporate social responsibility, and protect its brand reputation. We will implement quarterly screenings of our supplier vetting software to ensure continuous monitoring and management of risks within our supply chain. Furthermore, this proactive approach not only safeguards the company from potential legal repercussions but also aligns with the growing consumer demand for ethical business practices, thereby enhancing stakeholder trust and long-term sustainability.

The forced and child labour risk assessment commenced in November 2024, with the initial scope limited to Steelcase's scorecard suppliers. These suppliers were defined by an internal cross-functional team based on criteria such as procurement spend, and the criticality and quality of materials provided.

### 2.3.3 Supplier Education

In addition to conducting risk assessments, Steelcase hosted a Global Supplier Forum bringing together the leadership teams of our suppliers. This forum served as a platform to communicate our commitments and expectations for responsible sourcing, emphasizing the importance of ethical practices throughout the supply chain.

Steelcase also held smaller-scale meetings with individual suppliers to provide more focused education on our responsible sourcing commitments and expectations. These sessions aimed to ensure that all suppliers fully understand and align with our standards, fostering a collaborative effort towards ethical and sustainable business practices.

Steelcase's core values are reflected in our Global Business Standards, which outline the fundamental principles that guide the company's ethical and legal responsibilities worldwide. These standards apply not only to internal conduct at Steelcase, but also to interactions with customers, dealers, suppliers, and other stakeholders.



For more information on Steelcase's Global Business Standards with our suppliers, please visit <https://www.steelcase.com/resources/documents/global-business-standards/>

#### 2.3.4 Integrity Helpline

Incidents of non-compliance with legal requirements, Steelcase policies, or our Core Values concerning human rights issues within the supply chain must be reported. Reports can be submitted through our confidential Steelcase Integrity Helpline, managed by an independent third party. This helpline is accessible to Steelcase employees, stakeholders, and suppliers globally. Suppliers and other stakeholders can use this helpline to report any unethical, illegal, or non-compliant activities with our Global Business Standards within the supply chain.

To access Steelcase's Integrity Helpline, please visit <http://integrity.steelcase.com/>

### 3. RESULT OF OUR MEASURES

#### 3.1 NEW SUPPLIER VETTING SOFTWARE:

According to the screening conducted through our supplier vetting software, Steelcase's direct suppliers do not to engage in the use of forced or child labour. This tool enables us to screen materials, and the upstream supply chain of suppliers up to 5 tiers for potential involvement in forced or child labour, sanctions, export controls, regulatory action, and political exposure. This process and tool will put Steelcase in a position to proactively identify and mitigate potential ethical and legal issues within its supply chain. By leveraging this tool, Steelcase can ensure compliance with international regulations, uphold its commitment to corporate social responsibility, and protect its brand reputation. We will implement quarterly screenings of our supplier vetting software to ensure continuous monitoring and management of risks within our supply chain.

We have screened 365 suppliers, which equivalent to our top 80% of our suppliers based on spent. However, a small number of suppliers were flagged for exporting goods associated with a Harmonized System (HS) Code and country of origin that are listed on the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor. To further assess and clarify the potential risk, we will engage directly with these suppliers to verify the origin and production methods of the materials in question.

##### 3.1.1 Number of risks screened in Steelcase's upstream supply chain

In the extended screening of our supply chain up to tier 5, a total of 34 individual suppliers were flagged with high-severity risk indicators in the supplier vetting software. The most frequently identified concern was the ownership of a Xinjiang-based entity, which was found within Steelcase's tier 5 supply chain.

#### 3.2 SIGNING RATE OF SUPPLIER CODE OF CONDUCT:

To uphold our dedication to responsible sourcing, Steelcase will remain committed to integrate the Supplier Code of Conduct and pertinent policies into our supplier contracts in addition to evolving human rights, eliminating forced labour and child labour risk, and promoting responsible sourcing in our supply chain to meet the global expectations. As of this reporting period, 92.25% of our direct spend suppliers have officially signed contracts and comply with our company's policies.

Steelcase is committed to continually enhancing our Supplier Code of Conduct to align with current local regulations and adapt to changing global circumstances.

## 4. OUR EXPECTATIONS FOR FISCAL YEAR 2026

This year, Steelcase reaffirmed its commitment to eliminating forced labour and child labour from its supply chain. Following the deployment of our supplier vetting software in the previous fiscal year, we aim to further refine its application by establishing clear terminology and criteria to help prioritize suppliers based on material risk and their overall impact on our supply chain.

### 4.1 DEVELOP NEW SUPPLY CHAIN DUE DILIGENCE QUESTIONNAIRE

In addition to the supplier vetting software, Steelcase will be launching a supplier self-assessment questionnaire focused on supply chain risks. This initiative will enable us to gather direct input from our suppliers regarding their practices.

### 4.2 EXPAND CRITERION IN SUPPLIER AUDIT

Steelcase plans to conduct comprehensive supplier audits, addressing a range of sustainability topics. These audits will place particular emphasis on supply chain due diligence across various regions, ensuring that our suppliers adhere to ethical, responsible, and sustainable practices. Through this initiative, we aim to strengthen our ability to detect and address such risks, further enhancing the effectiveness and partnership with our suppliers of our due diligence measures.

### 4.3 REWRITING CORPORATE POLICY

To further strengthen our due diligence efforts regarding forced and child labour in our supply chain, Steelcase is planning to expand its corporate policy as needed. This expansion will explicitly outline our expectations for suppliers in relation to environment, social, and governance expectations within the supply chain.

**Steelcase®**