

GLOBAL BUSINESS STANDARDS

A Message from Jim Hackett



“Acting with integrity” is a key principle that has guided our individual and corporate business thinking, decisions and behavior for more than 90 years. It’s a legacy handed down from the founders of our company and it is still evident today. The documentation of these, our best practices, was developed for a number of reasons.

First, it is a public declaration of our company’s intent. We want people to know we are committed to conducting our global business as we always have - by doing not only what is right, but what is best.

Second, it summarizes information found throughout our company and integrates it with the policies, practices, aspirations and standards that our employees have in common around the world.

Third, this is an accessible means for sharing our responsibilities and a training tool to support you in your job. The global business standards provide a real-life context for our policies and procedures.

But we know that challenging situations may arise, so you are further supported by our Global Business Standards Integrity Line. We are in business together. Your reputation is our company’s reputation. Thank you for all you do to uphold our high standards,

A handwritten signature in black ink that reads "J. Hackett". The signature is written in a cursive, flowing style.

James P. Hackett
President and Chief Executive Officer

GLOBAL BUSINESS STANDARDS

A Global Company



Being a global company means that the way we do business must recognize and comply with the laws and regulations of international commerce. It requires understanding the laws and culture of all

countries in which we are located or serve customers. Because Steelcase is a U.S. based multi-national company, it may require that U.S. law take precedence in situations where the laws of another country may conflict.

We are in this together

Steelcase employees make decisions every day.

It is our responsibility to act lawfully, ethically, fairly and in a manner that sustains healthy business relationships and instills loyalty. We want you to know how to handle situations and who to call for answers to your questions and concerns.

Contents

- purpose of the Global Business Standards
- our responsibilities
- why and how to get help
- the areas covered by the Standards
- related policies and procedures
- who to call list

GLOBAL BUSINESS STANDARDS

Why do we have the standards?

The Steelcase Global Business Standards are based on many sources: government regulations, cultural values, customs, ethics and our company core values.

Our Global Business Standards explain the behaviors required to ensure legal compliance and reduce the risk of inappropriate choices. Some functional areas require more thought and careful consideration when making judgment calls, such as: antitrust practices, conflict of interest, copyright infringements and purchasing agreements.

While there are certainly right and wrong answers, there is generally only one best answer for our employees.

The directors, executives and officers of the company are ultimately held responsible for establishing and ensuring policies and procedures in support of these standards and our corporate code of conduct.

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The Global Business Standards Policy

The Global Business Standards are based on common business standards and practices. They work with, but do not replace corporate and governmental regulations.

You are expected to abide by corporate policy, practices, guides, handbooks and the laws and regulations governing the areas where we do business.

Our Global Business Standards applies to all employees around the world at all Steelcase entities. In addition, our partners, dealers, suppliers, service providers, consultants and others with whom we do business are expected to conduct their activities accordingly when supporting Steelcase.

We are a U.S.-based multinational company. As such, many of the laws of the United States apply to our foreign operations. In those cases we will comply with the U.S. laws first, and then take in to account the laws of others countries. If you believe these laws conflict, contact the Legal Strategies and Services Team in Grand Rapids, Michigan.

In addition, we expect people (for the collective interest of the company) to report violations or raise ethical concerns without delay. Steelcase policy protects employees from being threatened or punished in any way for reporting suspected violations for our Global Business Standards.

We take great pride in our company's reputation for integrity, so our corporate standards go beyond obeying the legal and regulatory minimums required in countries where we do business. We encourage our people to honor the spirit and intent behind these guidelines, and we want to align ourselves with businesses that also embrace high ethical, legal and regulatory principles.

GLOBAL BUSINESS STANDARDS

Integrity Process

- **Discuss with your manager or team leader**
- **Talk to your Human Resources or Employee Relations manager**
- **Use the Integrity Line**
- **Use the Open Door process**

Know What to Do and Where to Go for Help

First take your concerns to your manager or team leader. If they are unable to help you, or if this is inappropriate, use the Integrity Line. You should always feel free to speak out about situations that can cause legal, safety, environmental or other potential problems at work.

The purpose of the Integrity Line is to help resolve concerns, not identify the person reporting an issue. Every effort is made to keep this service confidential. The consultant you will speak to is not a Steelcase employee. You will not have to give your name when you call. There are no recorders or devices that can identify you or trace the number from which you are calling. If you choose to file a report, you will be given a tracking number so that you can check back on the status of the report without revealing your name.

Protecting Those Who Report Concerns

Company policy ensures that no retaliation occurs as a result of anyone who raises or pursues an ethical, legal or regulatory issue. Moreover, every effort will be made to protect the confidentiality of individuals who report questionable actions.

Integrity Line Telephone Numbers

Additional information is always available through the **GBS INTEGRITY LINE** website (<https://www.compliance-helpline.com/welcomePageSteelcase.jsp>).

GLOBAL BUSINESS STANDARDS

Our six key responsibilities

- To each other
- To our employees
- To our shareholders
- To our customers
- To our business partners
- To our worldwide communities

Our responsibilities are far reaching

There are six areas in which we share responsibility

Responsibilities to each other

We are accountable to:

- Understand and support our Global Business Standards
- Comply with applicable laws and regulations (some of which are based on United States laws)
- Comply with applicable company policies and practices
- Maintain a high standard of honest and appropriate business behavior
- Avoid compromising situations (i.e., where one helps or appears to help another person violate any law, regulation or company policy)

Our leadership team is required to:

- Understand and support our Global Business Standards
- Explain our business conduct guidelines to the individuals they lead, especially those who are newly hired, promoted or have taken on different responsibilities
- Avoid compromising situations
- Train our team members to ensure they are aware of, and are in compliance with legal and regulatory issues regarding their jobs
- Create an open environment where ethical, regulatory and legal issues can be discussed openly
- Act with integrity and set an example of high ethical behavior

GLOBAL BUSINESS STANDARDS

Responsibilities to our employees also cover six areas

- Treat people with dignity and respect
- Develop employees
- Embrace diversity
- Use the Open Door
- Respect employee privacy
- Provide a safe and healthy environment

Responsibilities to our employees

Within this category are six additional key standards to which all employees must adhere

Treat people with dignity and respect

The company will not tolerate discriminatory behaviors or practices within any of our work environments. Our people have the right to work in an atmosphere that is free from intimidation, threats, hostility, violence, harassment or disruptions to work performance. You are expected to promptly report discriminatory or harassment behaviors if they are observed. We will comply with the employment laws in the countries in which we operate.

Develop employees

Development opportunities are ensured through the Performance Management Process, training, tuition reimbursement, teamwork and career planning.

Embrace diversity

A company does not exist without its people. We are committed to supporting and embracing diversity and inclusion throughout our work force, our suppliers and our dealer network.

Use the Open Door

Our employees are invited to discuss concerns with management. All employees are encouraged to go to their Employee Relations managers or request an opportunity to discuss issues with another member of Steelcase management. There is a process for using the Open Door designed to resolve issues quickly and appropriately. To take advantage of this opportunity to discuss concerns, refer to the policy for instructions.

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Respect employee privacy

The company maintains employee information that is required by law to do business effectively. These records are confidential and the company respects your privacy and your dignity. We will, however, balance this concern for individual privacy with a concern for the dignity, safety and well-being of others.

Provide a safe and healthy environment

All facilities are required to have an established safety program that meets all applicable laws, regulations and corporate policies to ensure safe and healthy working conditions. Employees are expected to observe safety and health rules. This includes taking proper health, safety and environmental precautions. Report all accidents, injuries, unsafe practices or conditions to your supervisor. Employees are required to report to work free from the influence of any substance that could prevent them from functioning safely and effectively on the job. The company is responsible to take prompt and appropriate action to correct situations.

GLOBAL BUSINESS STANDARDS

Responsibilities to our shareholders cover these major topics:

- Maintaining accurate business records
- Acting responsibly
- Dealing with government officials or legal representatives from other companies
- Disclosing financial information about Steelcase Inc. Operations
- Responding to media requests or making public statements

Responsibilities to our shareholders

Within this section, there are standards regarding responsibilities towards our shareholders

Maintaining accurate business records

Steelcase must provide shareholders and other stakeholders with meaningful and adequate financial information. The information follows the rules and regulations of the U.S. Securities and Exchange Commission (SEC) and other regulatory agencies.

Our company uses a system of internal controls over our financial records to ensure that transactions are properly executed and recorded. All company records are regularly audited by internal and external auditors and regulatory agencies. We follow all statutory and regulatory requirements in our financial records, and we obey all the rules of the U.S. federal (Sarbanes-Oxley Act of 2002), state and local governments, and their equivalent authorities in any other country in which we do business.

Acting responsibly

Each manager is responsible for maintaining internal controls and for ensuring that his or her function is in compliance with government rules and regulations.

When acting on behalf of the company, our employees are expected to act honestly during all transactions. This includes the accurate completion of employee travel expense reports, financial statements and reports. No secret or unrecorded cash funds or other assets will be established or maintained for any purpose.

Concealing or withholding information from management, or the internal or external auditors, is a serious offense. Individuals who are aware of possible falsification or fraudulent activities must report these to the Internal Audit department, Human Resources, or use the Steelcase Global Business Standards **Integrity Line** or the Open Door process to inform executive management.

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Dealing with government officials or legal representatives from other companies

The Steelcase Legal Strategies Team will deal with inquiries by any federal, state, local government or agency and legal representatives from other companies. If an employee is approached for information, he or she should refer the inquiry to the Legal Strategies Team.

If papers are served on the company, employees should decline them and direct the person serving the papers to the Legal Strategies Team. Involve your supervisor immediately.

Disclosing information about Steelcase Inc. operations

All requests for financial data or information regarding the operations of Steelcase Inc. should be directed to the Investor Relations department.

Investor Relations will answer inquiries from investors, security analysts, security trading markets, suppliers, customers, and the public at large regarding Steelcase operations and performance. However, we can only respond to requests that do not violate the laws of the Securities and Exchange Commission.

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Responding to media requests or making public statements

Requests for information from the media should be cleared through the Public Relations/Corporate Communications department.

Any business information disclosed to the public will be made in accordance with the Steelcase Corporate Communications policies, as well as all applicable laws and regulations.

Did you know...

When wearing a corporate logo, such as a hat or jacket, you are publicly representing your company. Statements or opinions made to any media personnel are not appropriate. It is best to refer any media questions regarding the company to the Steelcase Public Relations Department.

Assets

Taking care of our company includes company assets...these are things that belong to the company. From paper clips to machinery, it is our responsibility to save and protect these assets. Doing so protects the company and its financial stability.

Tangible: something you can touch such as machinery, office equipment, furniture, supplies or tools.

Protecting tangible property

Employees are responsible for safeguarding all company assets under their control. These **tangible** assets include funds, property, software and records. When required, employees may be asked to provide accurate, auditable records of these assets. Employees must not use any Steelcase funds, property, information, or records for any unauthorized non-business purpose or for personal gain without proper permission. This can be considered theft of company property.

GLOBAL BUSINESS STANDARDS

Intangible: something you cannot touch such as information, ideas, strategies or processes.

Protecting intangible property

Our employees are responsible for properly using, conserving and protecting **intangible** company assets. This includes proprietary business or technical information, patents, brands, trademarks, goodwill, software and other intellectual property.

Employees may not use Steelcase intangible property for any unauthorized non-business purpose or personal gain without proper permission. Doing so can constitute theft of company property.

Protecting proprietary information

Employees may not divulge any confidential company information to any individual or company. There are certain business circumstances in which sharing confidential information is beneficial. However, it is first necessary to consult with the Legal Strategies Team.

This includes employee, financial, product, acquisition, merger, or any sensitive information that could benefit our competitors, suppliers, customers or any other individual or entity if made public.

Avoiding conflicts of interest

Employees must not allow personal considerations or relationships to influence their business-related decisions. Additionally, being influenced by family members or close personal relationships is a conflict of interest. Examples include outside financial interests; doing business with relatives; accepting or giving business gifts, money or hospitality.

Pursuing outside employment

Employees are free to have hobbies, businesses, or other interests outside of the company. However, they must be sure these activities do not conflict in any way with their obligation to Steelcase, and they may not approach co-workers to sell products or promote their hobby or business while working on company time or premises.

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Serving on outside boards

Service to nonprofit organizations is encouraged because it reflects our corporate dedication to the local communities in which we live and do business. Employees may serve as a director of a nonprofit board if it does not pose a potential conflict of interest. To determine if there is a potential conflict of interest, contact the Director of Internal Audit.

In the United States, employees who wish to serve on a for-profit public board of directors must get prior approval from the Director of Internal Audit.

Avoiding gambling/loan activity

Gambling is not permitted on Steelcase time or property. The company also discourages employee-to-employee loans due to varying laws. In the U.S., for example, some states require individuals to be licensed before making loans or regulate the amount of interest that may be charged.

Did you know...

While on company property, any exchange of money for leagues, pools, or games is gambling, even if you are on a break or lunch.

Avoiding insider trading

Steelcase is committed to maintaining the confidence of our shareholders and the financial marketplace. The Steelcase **Insider Trading** policy restricts when our employees can buy and sell Steelcase stock. Employees and members of their households cannot use "non-public information" about Steelcase to their personal advantage nor should they share information with others.

GLOBAL BUSINESS STANDARDS

Responsibilities to our customers cover three topics:

- **Quality, value and innovation**
- **Customer satisfaction**
- **Advertising**

Responsibilities to our customers

*Within this section, there are **three** standards regarding responsibilities towards our customers*

Quality, value and innovation

The safety and health of the people who use our products are a primary consideration in our product design and production. We consistently monitor product quality and safety, and we are dedicated to continuous improvement in our products and services.

All of our operating units are responsible for designing, manufacturing and delivering products that, at minimum, conform to the applicable industry standards for product quality and safety prior to sales conducted in that country.

Striving for customer satisfaction

We want to ensure our Steelcase dealers and customers are not just "served," but they are truly satisfied with their experiences with our company, dealers and service providers.

Advertising

Steelcase will not be a part of false advertising because it is contrary to two of our company's core values: to tell the truth and to act with integrity. We will represent our products and services honestly and factually.

GLOBAL BUSINESS STANDARDS

Responsibilities to our business partners cover five topics:

- Fostering good corporate citizenship
- Making political contributions
- Honoring the "Foreign Corrupt Practices Act of 1977"
- Participating in non-U.S. international boycotts or restrictive trade practices
- Complying with import/export laws

Responsibilities to our business partners

*There are **five** areas to consider when involving business partners*

Fostering good corporate citizenship

We support our local communities in order to improve the quality of life wherever our employees live. The Steelcase Foundation and Steelcase Inc. make cash and furniture donations on a regular basis. Our company provides support for hundreds of organizations in the areas of art and culture, education, environment, health and human services, social welfare, and community and economic development.

We encourage our employees to participate in organizations and projects that benefit their communities. We also encourage our employees to participate in professional or trade associations (with their manager's prior approval) because we believe this will increase their knowledge and improve their performance.

Making political contributions

On a personal level, employees may give to any political party, candidate or political action committee. The company will not reimburse employees for political contributions.

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Honoring the "Foreign Corrupt Practices Act of 1977"

This act is one of the regulations governing Steelcase as a U.S.-based, multinational company. It requires that Steelcase will not make, or allow payments to be made on its behalf to a foreign government official or an official of a government-owned business in order to obtain, retain or direct business. Such activity is prohibited by the "Foreign Corrupt Practices Act of 1977." Moreover, similar laws have been, or are in the process of being, enacted in many of the countries in which our company operates and where we do business.

Outside of the United States, such payments, gifts, loans, or services are permitted only if they are legal in the country in question and do not violate U.S. law. Items of this nature must be approved in advance by the appropriate corporate vice president and the Steelcase Legal Strategies Team.

Participating in international boycotts or restrictive trade practices

Our company will not participate in, or support, international economic boycotts unless they are sanctioned by the United States. This is prohibited under the U.S. government's anti-boycott laws. Steelcase complies with all current U.S. embargo laws that prohibit exports to certain countries or to the governments of certain countries. If a situation puts you in legal conflict with the laws of the country in which you are doing business, contact the Steelcase Legal Strategies Team immediately for assistance.

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Complying with import/export laws

Steelcase and its suppliers, agents, dealers and any other business entity supporting Steelcase must comply with U.S. import and export laws and those of countries of origin and destination. Regulations are developed to ensure there is a balance between import and export business of products, equipment, services, technology and raw materials.

Did you know...

In considering locations around the world, Steelcase will never seek preferential treatment, but will take advantage of government incentives offered to encourage business in a particular location.

GLOBAL BUSINESS STANDARDS

Responsibilities to our worldwide communities cover two topics:

- We have a legacy for ethics
- Protecting the environment

Responsibilities to our worldwide communities

These responsibilities address two areas:

We have a legacy for ethics

An "ethical company" obeys the laws of the land and the regulations established for its business or industry. Our employees are expected to act within the law and to honor the spirit behind it. Sometimes our international business operations encounter laws, local customs and social norms that differ from U.S. practice. United States laws that control our business activities outside the U.S. will always override local laws.

We will not do anything that is prohibited by, or inconsistent with, U.S. laws that apply outside the U.S. However, such conflicts are unlikely to be encountered by most employees. Questions of this type should be directed either to the Integrity Line or the Steelcase Legal Strategies Team.

Protecting the Environment

Each time we act on our core value to "protect the environment", we make a positive contribution to our employees, customers and community. Our goal is to be proactive and continually incorporate environmental, health and safety considerations into our products, activities and services. We continually strive to meet or exceed all applicable environmental requirements.

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Steelcase will not tolerate the willful disregard of environmental, health or safety considerations on company property or when representing the company. We will follow the legal requirements or standards that apply to the countries in which we operate. We will deal professionally, affirmatively and openly with investigating authorities during any compliance inspections in conjunction with the Steelcase Legal Strategies Team.

Did you know...

Steelcase has comprehensive recycling procedures.

Repurposing and recycling office supplies saves money and helps the environment. In the United States, businesses could save \$1.5 billion and at least 100,000 barrels of oil annually by sending printer and copying cartridges for remanufacturing.

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Who to Call

Always feel free to work through your supervisor. However, should you need to contact someone use these resources. The following numbers are available as AT&T Direct numbers for countries that will not have International Toll Free Service. Employees may use the Collect Calling Option or the Global Website to report issues.

Integrity Website <https://www.compliance-helpline.com/welcomePageSteelcase.jsp>

North America Toll Free Integrity Line	1-800-437-6167	(French, Spanish, Mexican, Vietnamese, Chinese Mandarin)
International Collect Call Integrity Line	(704) 943-1134	(Answered in English, with translators available)
International Toll Free Integrity Lines	Germany	0-800-182-260 (German and English)
	France	0-800-90-3855 (French and English)
	Spain	900-96-1205 (Spanish and English)
	Malaysia	1-800-80-5848 (Malay and English)
International Direct Integrity Line	Australia	888-708-0785 (English)
	Belgium	888-562-5118 (English)
	Brazil	888-708-0789 (English)
	China	888-708-0787 (English)
	Czech Republic	888-311-6718 (English)
	Dominican Republic	888-311-6693 (English)
	Hong Kong	888-562-5154 (English)
	India	800-232-4883 (English)
	Italy	888-562-5159 (English)
	Japan	888-562-5176 (English)
	Morocco	888-507-5618 (Arabic, French, English)
	Netherlands	888-562-5132 (English)
	Poland	888-562-5148 (English)
	Portugal	888-562-5129 (English)
	Russia	888-311-6724 (English)
	Saudi Arabia	888-562-5156 (English)
Singapore	888-708-0786 (English)	
Slovenia	888-311-6715 (English)	
Turkey	888-562-5158 (English)	
United Kingdom	888-562-5159 (English)	
Japan	888-562-5176 (English)	

GLOBAL BUSINESS STANDARDS

Tools and Job Aids

The following policies are referenced in this book and the on-line training class available through Steelcase University: LDR405 – Global Business Standards

North America Based Policies

Borrowing Company Equipment

Loan Sharking

Conflict of Interest

Disclosure of Relationships

Media Inquiries

Educational Assistance

Open Door

Employee Records

Reporting Fraudulent and Inappropriate Activities

Employee Travel & Reimbursement

Rewards and Recognition

Environmental, Health and Safety Standards

Smoke Free Environment

Equal Employment Opportunity

Solicitation

Gambling

Substance Abuse

Harassment Prevention

Unauthorized Removal of Company Equipment

Insider Trading

Violence in the Workplace