

Harassment Prevention/Respect and Responsibility

Steelcase expects all our locations to create and maintain a work environment that promotes respect and dignity and is free of harassment and offensive behavior. We acknowledge that different laws and regulations per country may exist, and this policy will be, if needed, interpreted according to each one of them.

Steelcase has a continuing commitment to provide equality of employment for all its employees, and strives to maintain an atmosphere of mutual respect and trust in which employees feel safe to take appropriate action if they feel they are being harassed or if they observed/witnessed others being harassed.

Harassment, in any form, by either management or co-workers, violates company policy of treating all people with respect. This includes but is not limited to harassment based on any status or class protected such as race, color, religion, national origin, sex, age, physical or mental disability, sexual orientation, sexual identity or veteran status leading an individual to feel pressured, threatened or humiliated.

Management will act promptly to investigate allegations of harassment, and will take disciplinary action when it is warranted. In no way will the filing of a good faith harassment complaint or the outcome of an investigation result in any loss of job security for the complainant.

A series of seemingly minor offenses can constitute harassment or sexual harassment even though each offense in and of itself does not seem serious. Frequency of occurrence, repeated offenses, or patterns of offensive behavior are considerations in determining whether or not a person's behavior constitutes harassment.

Harassment can be defined as conduct, which has the purpose or effect of:

- Creating an intimidating, hostile, or offensive work environment
- Unreasonably interfering with an individual's work performance by affecting the person's mental or physical health
- Otherwise affecting an individual's employment opportunities

Sexual harassment can be defined as any unwanted sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature when any of the following is true:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.

- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance by violating the person's dignity or creating an intimidating, hostile, or offensive working environment.

Prohibited conduct includes behaviors such as:

- Offensive sexual flirtations
- Suggestive comments
- Sexual innuendo
- Unwanted physical contact
- Repeated requests or pressure for "dates"
- Advances
- Propositions
- Insults or verbal abuse of a sexual nature
- Graphic verbal commentaries about an individual's body
- Use of sexually degrading words or vulgar words of a sexual nature
- Humor or jokes about sex or gender-specific traits
- Display of sexually suggestive objects or pictures

Prohibited conduct also includes non-verbal suggestive sexually insulting actions such as:

- Leering
- Whistling
- Suggestive sounds
- Obscene gestures
- Prohibited touching would include any unwelcome touching of a sexual nature
- Pinching
- Intentional brushing of the body
- Sexual assault
- Coerced sexual acts

Other Types of Harassment

Examples of harassment which are inappropriate and will not be tolerated at Steelcase include but are not limited to the following:

Verbal Harassment

- **Jokes:** Telling offensive jokes; taunting co-workers or employees; mimicking someone's speech or accent; singling out an employee or co-worker as the object of jokes.
- **Stereotypes:** Making comments or remarks that perpetuate stereotypes and myths about an individual or group.
- **Proselytizing:** Imposing religious views on others; inviting others to participate or engage in unwanted conversations or activities based on religion to the point of creating a hostile work environment.
- **Denigration:** Directing slurs, epithets, insults, and derogatory comments toward an individual and/or that person's group.
- **Name Calling:** Referring to an employee or coworker by derogatory names; affording titles of respect to some but not all employees or co-workers; making an employee look like a poor worker.

- Threats: Making verbal threats, intimidating employees or co-workers, making harassing phone calls.
- Rumors: Creating or spreading false and/or malicious rumors about an individual.
- Bullying: abusive or intimidating behavior perpetrated against an individual by one or more persons.

Non-Verbal Harassment

- Visual Displays: Displaying pornographic materials, lewd photographs, offensive or hate symbols, derogatory cartoons, graffiti or other graphic material in common areas or via computer.
- Hazing: Singling out an employee or co-worker and subjecting him or her to ridicule; subjecting everyone to pranks that have a discriminatory effect or meaning for some individuals.
- Touching: Touching the intimate or non-intimate body areas of an employee or co-worker.
- Segregation: Ostracizing, excluding, refusing to support or offer resources to, or blocking access to an employee or co-worker.

Discipline

Violations of this policy will subject an employee to disciplinary action up to and including termination of employment.

Reporting Harassment

All Employees must comply with this policy and are encouraged to report instances of harassment. An employee who believes has been the victim of or witnessed harassment should make the complaint known by contacting any of the following options:

1. HR Representative
2. Steelcase Integrity Helpline (For U.S. Toll Free call: 1.800.437. 6167, For all other countries integrity.steelcase.com).
3. Supervisor
4. Head of Function
5. Other local representative prescribed by local rules or regulations: such as specific internal officer or employee representatives

Reports of harassment may be made anonymously to the Integrity Line, but providing names will help Steelcase to thoroughly collect all relevant accounts of the incident in a timely manner. However, certain countries do not allow the option of anonymity due to local rules and regulations. In these cases, they will be required to identify themselves in order to report their incident.

Any complaint should be reported as promptly as possible, preferably within one week of the incident. All complaints will be investigated, regardless of when reported, but Steelcase's ability to investigate thoroughly and provide timely follow-up may be hampered if the report of the incident is delayed.

Investigation

An investigation will be led by internal teams, which could include employees from HR, Legal, Corporate Security and Global Audit, and other local representatives as prescribed by local rules or regulations. During the investigation, interviews may be conducted with involved individuals and any witnesses, if available. Investigators treat information as confidential to the fullest extent possible. We could get outside counsel or linguists/ translators in the investigation if the case requires it.

Taking appropriate action

The findings from interviews will be consolidated into a report and reviewed by the team that examines all cases of harassment (including HR, Legal, Corporate Security, Global Audit, and other local representative as prescribed by local rules or regulations). The team will determine the appropriate action to take based on the findings. Depending on what was learned, these could include a warning, coaching or suspension and termination.

Employees are warned that criminal penalties may also apply according to the local applicable law, notably in case of a judicial claim initiated by the victim. The company will not interfere with civil or criminal legal proceedings.

Along the way, the HR professional assigned to address the incident will be in contact with those involved: answering any questions about the process, following up once a determination is made and checking in with the affected employee again 3 months after the conclusion.

Supervisors, including assistant supervisors, temporary supervisors, lead persons, zone leaders and above, must be certain their own acts respect the rights and dignity of all their subordinates and coworkers and cannot be misconstrued as harassment. In addition, supervisors must act immediately on observation or allegations of harassment. The company may also be held legally liable for the acts of its supervisory employees who engage in or condone harassment, either openly or through failure to act.

All levels of management are responsible for:

- Being alert to possible instances of harassment by observing subordinates' interactions.
- Immediately addressing instances of potential harassment.
- Immediately implementing an investigation in response to alleged or observed harassment.

Human Resources is responsible for collecting data, verifying information pertinent to the harassment complaint and conferring regarding appropriate disciplinary action. Upon resolution of the harassment complaint all documentation should be entered in the Convercent database.

The VP of Global Talent will be made aware of harassment based upon any status or class protected by law. The Global Human Resources department maintains copies of the complaint documentation and results for all complaints filed in regards to this policy.

This policy has been implemented following consultation with trade unions, work councils or staff association, where locally required.

This policy doesn't form part of any employee's contract of employment and we may amend it at any time.