

Steelcase Inc.

Political Activities and Contributions Policy

Steelcase believes that engagement in the political, legislative, and regulatory process is important to our company. We participate in the political and public policy process in ways that are intended to support the best interests of our company, employees, customers and shareholders. Our political activities are never based on the personal preferences of individual employees, executives, or board members. They are done in accordance with all applicable laws, and consistent with our high ethical standards.

This Political Activities and Contributions Policy (this “Policy”) augments and supplements Steelcase’s statements on political interaction and contributions reflected in the Code of Business Conduct and the Anti-Bribery and Anti-Corruption policy.

Corporate political contributions

The company does not make any contributions from corporate funds to candidates for state, local, or federal office or to political parties. Steelcase also does not make any contributions from corporate funds to organizations classified under the Internal Revenue Code as section 527 entities or to any Super PACs, ballot initiatives, electioneering communications, or for independent political expenditures. The company does not maintain a political action committee (PAC).

The company also does not provide in-kind contributions, including use of Company offices, telephones, office supplies or employee time to support an officer holder, candidate, or political party.

Lobbying

From time to time we engage in direct public policy discussions with federal, state and local governments. When we determine it is in the best interest of our company, we work with governments to provide information and perspective that support our point of view through our lobbyists.

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Any company political spending must receive prior written approval by the company's General Counsel. The company's General Counsel and the Head of Government Affairs are responsible for taking appropriate measures to assure compliance with this policy.

Any political spending approved by the company's General Counsel must reflect the company's business purposes, which can include tax reform, sustainability initiatives, changes to financial standards and reporting, and promote the interests of the company and not those of its individual officers or employees.

Steelcase will comply with all federal, state, and local laws that require disclosure of lobbying activities, including the federal Lobbying Disclosure Act and the Honest Leadership and Open Government Act.

No contribution or expenditure will be given or made in anticipation of, in recognition of, or in return for an official act.

No company funds or assets may be used for political contributions outside the United States, even where permitted by local law, without the prior written approval of the company's Chief Executive Officer and General Counsel.

Participation in trade associations

We participate in and pay annual dues to trade and industry associations that give us insight and knowledge into the issues and trends impacting our sector, and to the sectors that we research and advise. Participation as a member of these associations does not mean we always agree with all of the positions of the organizations, or those of other members.

Steelcase's General Counsel and the Head of Government Affairs will review trade association memberships annually to assess their performance and to determine if continued membership is appropriate.

Voluntary employee political participation

Officers and employees may participate in political activity as individuals and not as representatives of Steelcase. Under no circumstance will anyone be reimbursed for personal political contributions or expenses or use company resources to promote their personal political

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views, causes, candidates. Company resources include financial and non-financial donations, such as using work time and telephones to solicit for a political cause or candidate or lending the company's property for use in a political campaign. Personal, non-corporate contributions and expenses are not affected by this Policy. However, the executive officers of Steelcase, including the Chief Executive Officer, are encouraged to refrain from making any political contribution or campaign expenditure that could create any confusion between acts of the executive officers in their personal capacities and acts of the executive officers in their official capacities as executive officers of the company.

Steelcase will not pressure or coerce employees to make any political contribution or campaign expenditure or take any retaliatory action against employees for failing to do so.

Contacts with Government Representatives

Steelcase employees must promptly consult the Head of Government Affairs or the Legal department on issues that involve federal, state, and local government. Only Steelcase officers and employees approved by the Head of Government Affairs, or the Legal department may express the company's views on legislation, ballot initiatives, regulations, or government actions. Other employees may communicate the company's views only with specific guidance from the Head of Government Affairs or the Legal department. Only the Head of Government Affairs or the Legal department may hire lobbyists to help the company.

Compliance and oversight

Steelcase's General Counsel, in consultation with members of our executive leadership team, and our Head of Government Affairs oversee political, lobbying and compliance activities. The Head of Government Affairs is responsible for ensuring that the company's political activities are conducted and disclosed in accordance with applicable law.