

2021

# Supplier and Service Provider Code of Conduct



HNI

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HNI Corporation and its operating companies (collectively and individually, the “Company”) strive to maintain a culture of integrity. This culture depends on treating others with fairness and respect; being open, honest, and trustworthy; operating in an environmentally sustainable and socially responsible manner; and following all laws and regulations. The Company requires the same commitment to integrity from its suppliers and service providers (hereinafter “Service Provider”). To that end, all supply agreements, purchase orders and acceptances (each an “agreement”) are made subject to the terms of this Service Provider Code of Conduct (the “Code of Conduct”). Failure by Service Provider to comply with this Code of Conduct is grounds for immediate termination for cause by the Company of any agreement in effect between the Company and Service Provider, without liability on the part of the Company.

# Guiding Principles

- Treating others with Fairness and Respect
- Be Open, Honest, and Trustworthy
- Operate Facilities and Source Materials in an Environmentally Sustainable and Socially Responsible Manner
- Follow All Laws and Regulations

# Treating Others With Fairness and Respect

The Company expects its Service Provider to treat its employees with fairness and respect while also providing a safe and healthy work environment. At a minimum, Service Provider must meet the following requirements:

1. Treat all employees with dignity and respect, and not use or abide corporal punishment, threats of violence or other forms of physical, sexual, psychological, or verbal harassment or abuse.
2. Provide Employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring at a minimum, training in the primary language of the employees, reasonable access to potable water and sanitary facilities, provide workers with personal protective equipment, fire safety, and adequate lighting and ventilation. Service Provider will likewise ensure that the same standards of health and safety apply in any housing that it provides for employees. Employees must have the right to refuse unsafe working conditions without fear of discipline.
3. Establish procedures and systems to track and report occupational injury and illness, which must include documented corrective actions to reduce reported injuries. Service Provider is required to provide necessary medical treatment to facilitate employees' return to work.
4. Comply at a minimum with all applicable wage and hour labor laws and regulations governing employee compensation and working hours, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.
5. Not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination, or retirement, on the basis of race, color, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity, political opinion, protected veteran status, or disability.
6. Respect the rights of employees to associate, organize, and bargain collectively in a lawful and peaceful manner, without penalty.
7. Not participate in human trafficking or use slave labor in any part of their organization or supply chain.
8. Not use involuntary or forced labor of any kind, including, without limitation, prison, bonded, and indentured labor.
9. Not use child labor. "Child" means a person younger than the local legal minimum age for employment. In the absence of local law, Service Provider will not employ children under the age of 16.
10. Commit to building a culture of diversity and inclusion of all backgrounds without regard to gender, gender identity, race, ethnicity, religion, or other statuses.
11. Control exposure to chemical, biological, and physical agents by eliminating hazards or mitigating risks to the extent possible.

# Be Open, Honest, and Trustworthy

Striving to act with integrity requires open and honest communication between and within organizations. As such, Service Provider must adhere to the following requirements:



1. Provide goods and services that meet applicable quality, safety, and environmental standards and specifications.
2. Ensure that the principles of this Code of Conduct are communicated and adhered to by Service Provider's employees. If Service Provider identifies areas of non-compliance, the Service Provider agrees to notify the Company of its plans to remedy such non-compliance.
3. Authorize the Company or its designee to confirm Service Provider's compliance with this Code of Conduct through any reasonable means, including: unannounced onsite inspections of manufacturing facilities and employer-provided housing; audit Service Provider's books and records relating to employment matters to the extent Company is permitted by law to access such books and records; and private interviews with employees selected by the Company or its designee. Service Provider will maintain at its facilities all documentation that may be needed to demonstrate compliance with this Code of Conduct.
4. Maintain programs that ensure the confidentiality and protection of any employee who makes a disclosure about violations of this Code.





## Operate Facilities and Source Materials in an Environmentally Sustainable and Socially Responsible Manner

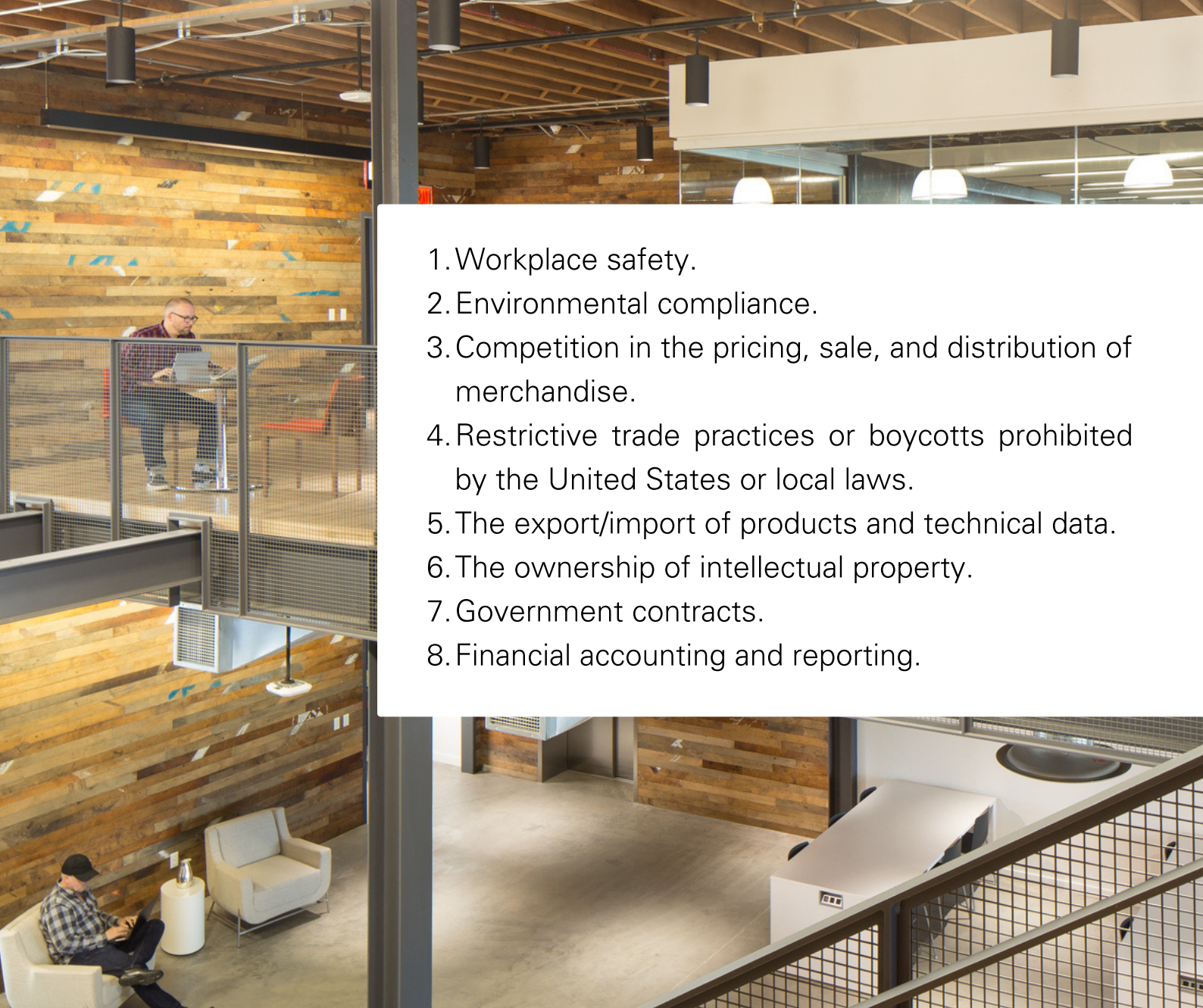
The Company expects Service Provider to operate facilities and source materials supplied to Company in an ethical, sustainable, and socially responsible manner, which shall at a minimum, include:

1. Obtaining and maintaining environmental permits and filing required reports.
2. Proper handling, movement, storage, and disposition of hazardous materials.
3. Monitoring, controlling, and treating discharge generated from operations, which includes airborne emissions.
4. Using reasonable efforts to measure and reduce waste, water, and energy within its operations.
5. Using reasonable efforts to measure and reduce packaging waste from products and materials sent to Company.
6. Using reasonable efforts to eliminate Styrofoam; expanded polystyrene, polyurethane, and polyethylene; and other difficult to recycle packaging from products and materials sent to Company.
7. Using reasonable efforts to measure and reduce the carbon intensity of materials, products, and services supplied to Company.
8. Avoiding trading and sourcing wood, wood fiber, or wood products from unacceptable sources, including:
  - a. Illegally harvested or traded timber or forest products.
  - b. Species of wood materials that are CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) listed or identified on the IUCN Red List (International Union for Conservation of Nature's Red List of Threatened Species) as endangered, critically endangered or extinct in the wild.
  - c. Timber or forest products harvested in violation of traditional and human rights in forestry operations.
  - d. Timber or forest products harvested from areas in which high conservation values are threatened by poor forest management.
  - e. Timber or forest products harvested from areas in which significant conversion of forests to plantations or non-forest use have occurred.
  - f. Timber or forest products from forest in which genetically modified trees are planted.
  - g. Conflict wood, defined as wood traded in a way that drives violent armed conflict or that threatens national or regional stability.
  - h. Forestry operations in violation of any of the ILO Core Conventions, as defined in the ILO Declaration on Fundamental Principles and Rights at Work, 1998. Exercising due diligence on relevant materials in its supply chains. The Service Provider shall develop due diligence policies and management systems in order to identify risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the materials processing level in order to determine whether relevant materials originate from regions with high risks. These high-risk areas include those associated with conflict, the worst forms of child labor, forced labor and human trafficking, gross human rights violations (such as widespread sexual violence), or other reasonably objective high-risk activities, including severe health and safety risks and negative environmental impacts.



# Follow All Laws and Regulations

The Company's Service Providers are required to comply with all applicable laws and regulations, foreign and domestic, including, without limitation, those regulating:

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- A photograph of a modern office interior. The walls are covered in horizontal wood planks. There are glass railings on a mezzanine level. A man is sitting at a desk on the mezzanine, and another man is sitting in a chair on the ground floor. The lighting is warm and modern.
1. Workplace safety.
  2. Environmental compliance.
  3. Competition in the pricing, sale, and distribution of merchandise.
  4. Restrictive trade practices or boycotts prohibited by the United States or local laws.
  5. The export/import of products and technical data.
  6. The ownership of intellectual property.
  7. Government contracts.
  8. Financial accounting and reporting.

# Follow All Laws and Regulations

All references to “applicable laws and regulations” in this Code of Conduct include local and national codes, rules, and regulations as well as applicable treaties and voluntary industry standards.

Service Provider is also expected to conduct its business with the highest standards of ethical behavior by adhering to the following requirements:

1. Complying with foreign legal requirements, United States, and local laws that apply to the Foreign Corrupt Practices Act. Bribery, corruption, extortion, and embezzlement, in any form, are strictly prohibited.
2. Not providing payment of bribes or kickbacks or allowing such payments or kickbacks to be made on its behalf.
3. Refrain from offering or providing gifts or entertainment to employees of the Company. Service Provider will ensure that its employees comply with this restriction against offering or providing gifts or entertainment to employees of the Company.
4. Abiding by all economic sanctions or trade embargoes that the United States had adopted, whether they apply to foreign countries, political organizations, or foreign individuals and entities.
5. Not directly or indirectly engage in or support any terrorist activity. Neither the Service Provider, nor any of its affiliates, officers, or directors, should be included on any list of terrorist or terrorist organizations compiled by the United States government or any other national or international body.
6. If Service Provider provides direct materials to be incorporated into Company products, it shall have a conflict minerals policy and establish reliable systems to assure that the tantalum, tin, tungsten and gold (collectively 3TG) in the goods it supplies to Company (“Goods”) do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Such Service Providers shall exercise due diligence on the source and chain of custody of 3TG in Goods and make their due diligence measures available to Company upon request. Such Service Providers shall also respond promptly to Company’s requests for information regarding the results of their due diligence, including but not limited to the country of origin or smelters and refiners of 3TG in Goods.
7. Taking appropriate steps to safeguard and maintain confidential and proprietary information of the Company and only use such information to the purposes specified for use.





# Conclusion

Finally, the Company expects Service Providers to ensure that Service Provider's subcontractors and Service Providers employed in the provision of goods or services to the Company have entered into a written commitment with Service Provider to comply with the principles of this Code of Conduct. This policy should not be read in lieu of, but in addition to, any supply agreements, purchase orders and acceptances. Please direct questions or concerns regarding this Code of Conduct to the Company's supply chain representative. If you would like to file a confidential report of non-conformance to this Code of Conduct, please use the HNI Corporation Speak Up portal: <http://www.speakup.hnicorp.com/>





**HNI Corporation**

**By:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_