

MODERN SLAVERY STATEMENT

Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act of 2015 by Steelcase (South-east) Limited trading as Insightful Environments, (hereafter IE). It is made for the Financial Year 2021/22 (March 1st to February 28th).

‘Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of slavery, servitude, and forced compulsory labour and human trafficking.’ This statement describes the commitments and actions taken by IE to identify and prevent, to the extent possible, the risk of modern slavery or human trafficking occurring within IE’s organisation and supply chains.

IE has a zero-tolerance approach to modern slavery and human trafficking in all of its business activities and relationships. IE is committed to the continual development and implementation of policies and procedures that limit the potential for modern slavery and human trafficking to occur within its value chains, consistent with the requirements of the Modern Slavery Act 2015. IE has similar expectations of its suppliers and business partners. Staff are encouraged and expected to report concerns where these may arise.

Our Organisation and Business

Steelcase (South-East) Limited, trading as Insightful Environments (IE) is a subsidiary of Steelcase Inc, incorporated in Grand Rapids, Michigan, USA. IE is a UK-based integrated furniture dealership and workplace design company. IE’s operations are located in London and Greater London and Leeds. IE has a workforce of design and support the procurement and project logistics for fit-out of corporate workspaces.

Depending upon the assignment, IE’s designers specify product criteria and suppliers, or IE’s clients and their intermediaries may specify products and suppliers against which the assignment should be completed.

IE’s project teams work at client locations to complete the fit-out.

Our Supply Chains

IE has more than 200 suppliers who are furniture and ancillary manufacturers and dealers from within the UK, Europe and rest of the world. In addition, IE holds stock on behalf of other dealers in the UK.

IE’s principal supplier [48% product in FY22] is Steelcase Inc. office and commercial furniture manufacturer located globally. Steelcase does not tolerate the use of child labour, forced labour, human trafficking or discriminatory practices within its operations or within the operations of affiliated partners. Steelcase has a global Supplier Code of Conduct and audit programme. Links to the Steelcase MSS, Supplier information are provided below:

https://www.steelcase.com/content/uploads/2023/08/Steelcase-Limited_Modern-Slavery-Statement_FY23.pdf

<https://www.steelcase.com/about/steelcase/suppliers/>

Steelcase also holds Global Supplier Conferences to provide suppliers with education around the company's commitments and expectations around many issues including human rights and labour practices.

In addition to IE's product suppliers, IE has suppliers and service providers who facilitate Company operations – these include waste management, utilities, cleaning contractors and fleet management among others.

Our Policies and Due Diligence Procedures

IE's supplier agreements / contracts require compliance with local labour laws. IE has adopted the Steelcase Supplier Code of Conduct. The Supplier Code of Conduct requires suppliers to meet local labour laws and to prevent human trafficking and modern slavery with their employees. In the event that a supplier fails to follow the Code of Conduct, the supplier must immediately take action to comply, or they face the risk of termination.

IE recently implemented a Supplier Management System to support procurement. This includes a screening process for all new suppliers which includes reference to Modern Slavery and Human Trafficking. Approval of the screening findings by IE Management is required before a supplier may be on-boarded. Existing suppliers are required to complete an annual self-declaration and periodically, depending upon perceived and identified risk will be subject to audit by IE staff. At present IE does not employ third parties for external audits of our supply chain.

IE will continue to develop its supplier management protocols as part of its environmental and social governance (ESG) programme to hold suppliers accountable in all areas of sourcing from labour to materials.

Training and Capacity Building

IE's Human Resources Manager ensures that all IE operations follow local labour requirements which include preventing any involvement by the Company or individuals of the Company in human trafficking or modern slavery.

IE's Employee Code of Conduct (ECC) includes a requirement for employees to comply with all applicable laws and regulations. Employees who violate laws or IE's corporate policies are subject to disciplinary action (process described in the ECC) up to and including termination. Formal acknowledgement by the new employee of the ECC is required during on-boarding. Periodically the ECC is updated. When this occurs, all employees are advised of the updates.

All Steelcase employees are trained on the Global Business Standards and adherence to the company's core values during on-boarding and as part of the annual employee performance reviews. IE ensures its employees complete the Global Business Standards training. In addition, IE's employees are required to complete UK-specific business standards training including UK Antibribery Act 2010 and the UK Modern Slavery Act 2015 as part of the induction training and on an annual basis.



IE maintains a whistleblowing, 'Integrity Line' for use by employees to anonymously report situations involving suspected non-compliance with laws regulations or IE's corporate policies and values. The Integrity Line is operated by an independent third party and is available 24 hours. Employees are advised of the Integrity Line during on boarding and reminded during the annual business standards training events.

Approval by Managing Director, Eric Valette

Steelcase (Southeast) Ltd T/A Insightful Environments

Signed:

Date: July 2023