

# Supplier Code of Conduct

## Intent

MillerKnoll, Inc., and its subsidiaries ("MK") are committed to conducting its business in an ethical, legal, environmentally sustainable and socially responsible manner. MK expects its suppliers to share its commitment to creating a Better World with the goals of reducing waste, using resources responsibly, supporting workers' rights and advancing the welfare of its workers and the community. We believe that partnerships based on transparency, collaboration and mutual respect are integral to making this happen. As such, MK has established this Supplier Code of Conduct to identify the minimum requirements for establishing and maintaining a supplier relationship with MK. Upon MK's request, suppliers will provide written documentation of actions undertaken to evidence the fulfillment of any and all of the requirements identified in this Supplier Code of Conduct.

## 1. Compliance with Laws, Regulations, and Published Standards

MK suppliers must comply with all applicable laws, codes, or regulations of the countries, states, and localities in which they operate. This includes, but is not limited to:

- Laws and regulations relating to the environment, including requirements stipulated by the Lacey Act (16 U.S.C. §§ 3371 -3378)
- Occupational health and safety
- Labor practices
- Compliance with the California Transparency in Supply Chains Act (SB 657)
- Foreign Corrupt Practices Act
- UK Bribery Act
- UK Modern Slavery Act
- The United States Uyghur Forced Labor Prevention Act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States market, and for other purposes.
- Executive Order 11246 (and its implementing regulations at 41 C.F.R. part 60)
- The Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended (and its implementing regulations at 41 C.F.R. 60-300)
- Section 503 of the Rehabilitation Act of 1973, as amended (and its implementing regulations at 41 C.F.R 60-741)
- Executive Order 13496 (and its implementing regulations at 29 C.F.R. part 471, Appendix A to Subpart A).

In addition, MK suppliers must require their suppliers (including temporary labor agencies) and all suppliers' suppliers to do the same. MK suppliers must conform their practices to any published standards for their industry. Upon MK's request, suppliers will provide documentation of actions undertaken to address zero waste, water efficiency, energy efficiency and worker rights and safety objectives, or a written commitment to pursue these or related initiatives. Upon MK's request, suppliers will allow for MK and / or MK approved 3<sup>rd</sup> party auditors to complete onsite audits confirming no forced labor is present in the supply chain.

## 2. Environmental Practices

MK suppliers shall comply with all environmental laws and regulations applicable to their operations worldwide. Such compliance shall include, among other things, the following items:

- (a) Obtaining and maintaining environmental permits and timely filing of required reports
- (b) Proper handling and disposition of hazardous materials
- (c) Monitoring, controlling, and treating discharges generated from operations.

## 3. Sustainable Wood Purchasing Policy

MK suppliers that provide wood or wood-based products to MK and/or their sub suppliers, if applicable, shall have a written policy commitment, endorsed by their executive management (CEO, President, Owner) to employ best efforts to avoid trading and sourcing wood, wood fiber or wood products (herein referred to as "Wood") from the following categories:

- (a) Illegally harvested Wood obtained in violation of applicable government forest management requirements or other applicable laws and regulations.
- (b) Wood harvested in violation of traditional and civil rights.
- (c) Conflict Wood, defined as Wood traded in a way that drives violent armed conflict or that threatens national or regional stability.
- (d) Wood from forests in which genetically modified trees are planted.
- (e) Wood harvested in forests where high conservation values are threatened by management activities, including those having the following attributes:

- Forest areas containing globally, regionally or nationally significant concentrations of biodiversity levels (e.g., endemism, endangered species, refugium) and/or large landscape level forests, contained within or containing the management unit where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.
- Forest areas that are in or contain rare, threatened or endangered ecosystems.
- Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control).
- Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity, to include areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities.

#### **4. Occupational Health and Safety Practices**

MK suppliers shall provide their employees with a safe and healthy working environment in order to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of the supplier. Suppliers shall, among other things, provide:

- (a) Occupational health and safety training.
- (b) A system for injury and illness reporting.
- (c) Medical treatment and/or compensation to injured/ill workers arising as a result of working for supplier.
- (d) Machine safeguarding and other protective measures to prevent injuries/illnesses to workers.
- (e) Clean and safe facilities.

#### **5. Labor Practices**

MK expects its suppliers to adopt sound labor practices and treat their workers fairly in accordance with local laws and regulations. In addition, suppliers must comply with the following standards:

- (a) Freely Chosen Employment. Suppliers shall not use any forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.
- (b) No Child Labor. Suppliers shall not employ child labor and comply with the minimum of local minimum working age laws and requirements or the International Labor Organization (ILO) standards.
- (c) Minimum Wages. Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements.
- (d) Working Hours. Suppliers shall not require workers to work more than the maximum hours of daily labor set by local laws.
- (e) No Harsh, Inhumane Treatment or Abuse. Suppliers shall treat each employee with dignity and respect. In no event shall Supplier's workers be subject to threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse.
- (f) No Discrimination. Suppliers shall not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability, or any other basis prohibited by law.
- (g) This contractor and subcontractor shall abide by the requirements of 41 CFR sections 60-1.4(a), 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, or national origin. Moreover, these regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, national origin, protected veteran status or disability.
- (h) Freedom of Association. Suppliers shall recognize and respect the rights of its workers to organize in labor unions in accordance with local labor laws and established practices.
- (i) Uyghur Forced Labor Prevention Act. As a US company, MK and its global suppliers must make available "clear and convincing evidence" that goods, wares, articles, or merchandise were not produced wholly or in part using forced labor or produced by an entity on a list created by the US Forced Labor Enforcement Task Force (FLETF). MK suppliers must establish and maintain a due diligence program, carefully assess Xinjiang Uyghur Autonomous Region and related supply chain risk, conduct supply chain tracing, audit existing and new supply chains regularly, and communicate results of these audits to MK Supply Management.

#### **6. California Transparency in Supply Chains Act of 2010**

MK strives to maintain an ethical work environment in its own facilities and in the facilities of its suppliers. In an effort to eradicate slavery and human trafficking from the direct supply chain to tangible goods offered for sale, MK employs the following practices and expects its suppliers to conform to it:

- (a) Verification. MK's policies and standards dictate that its suppliers refrain from the direct or indirect use of forced labor and any form of human trafficking. Suppliers are required to certify that they comply with these policies and standards.
- (b) Auditing. Suppliers are required to demonstrate adherence to MK's policies and standards prohibiting the use of forced labor and human trafficking by permitting social and environmental audits. These audits are conducted by MK's employees and independent third-party audit firms.

- (c) Certification. MK requires that its suppliers to comply with all applicable laws and regulations, provide a safe and sanitary workplace free from harassment and discrimination, and certify that materials incorporated into the products they supply to MK do not come from, and that they do not and will not knowingly engage in, any forced labor, slavery or human trafficking.
- (d) Internal Accountability. MK seeks to create and maintain internal accountability standards and procedures for employees and suppliers regarding slavery and human trafficking and to make it clear that MK does not engage in and does not intend to do business with suppliers that are engaged in slavery and human trafficking. As part of these standards and procedures, MK advises its employees and suppliers to bring any suspected issues involving slavery and human trafficking to the attention of MK management. Possible violations of MK's policy against slavery and human trafficking will be investigated and appropriate action taken, including possible termination of a supplier's relationship with MK.
- (e) Training. Supplier will provide periodic training for its employees and others who have responsibility for fulfillment of supplier's obligations to MK. This training will provide information concerning human trafficking and slavery, familiarize them with identifying slavery and human trafficking issues and address mitigating the risk of such issues within its supply chain of products.

## **7. Ethical Business Practices**

MK expects its suppliers to conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws and regulations. Suppliers are expected to conform to these requirements in each of the following areas:

- (a) Fair Trade Practices. Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.
- (b) Bribery, Kickbacks, and Fraud. No funds or assets of the supplier shall be paid, loaned, or otherwise disbursed as bribes, kickbacks, or other payments designed to influence or compromise the conduct of MK.
- (c) Foreign Corrupt Practices Act. While laws and customs vary throughout the world, all suppliers must comply with foreign legal requirements, United States, and local laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to foreign government officials, foreign political parties, party officials, or candidates for public office for the purposes of obtaining or retaining business.
- (d) MK Policies and Procedures. Suppliers must comply with MK's published policies and procedures.
- (e) Intellectual Property Rights. Suppliers shall respect the intellectual property rights of others, especially MK, its affiliates, and business partners. Suppliers shall take appropriate steps to safeguard and maintain confidential and proprietary information of MK and shall use such information only for the purposes specified for use by MK. Suppliers shall observe and respect all MK patents, trademarks, and copyrights, and comply with all requirements as to their use as established by MK. Suppliers shall not transmit confidential or proprietary information of MK via the internet unless such information is encrypted in accordance with minimum standards established by MK.
- (f) Animal Welfare. MK is committed to sourcing responsible, safe, and sustainable materials across its supply chain and collective of brands that promote the welfare of animals. Suppliers must be certified to applicable industry-leading animal welfare standards and support the Five Freedoms of Animal Welfare: (i) freedom from hunger, malnutrition, and thirst; (ii) freedom from fear and distress; (iii) freedom from physical and thermal discomfort; (iv) freedom from pain, injury, and disease; and (v) freedom to express normal patterns of behavior.
  - Mohair: Suppliers of mohair are required to adopt the Responsible Mohair Standard (RMS) and source 100% certified fiber by July 2025. RMS is a rigorous industry standard with third-party certification audits to ensure mohair comes from goats that have been treated responsibly and from farms with a progressive approach to managing their land.

## **8. Export Sanctions/Terrorism Activities**

MK suppliers must abide by all economic sanctions or trade embargoes adopted by the United States, the EU and/or the UK, whether they apply to foreign countries, political organizations, or particular foreign individuals and entities. International trade laws must always be complied with. We expect our suppliers to comply with applicable export and import obligations, anti-boycott regulations, economic sanctions and other applicable trade laws, regulations, policies, and procedures, wherever they operate. For example, when products, services, technology, software and/or technical data are sold, transferred, or shared by, to or with MK and/or our supplier.

Suppliers should not directly or indirectly engage in or support any terrorist activity. Neither suppliers nor any of their affiliates, nor any officer or director of the supplier or any of its affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body, including but not limited to:

- (a) The U.S. Treasury Department's Specially Designated Nationals List.
- (b) The U.S. State Department's Terrorist Exclusion List.

- (c) The United Nations List Pursuant to Security Council Resolution 1390 (2002) and Paragraphs 4(B) or Resolution 1267(1999) and 8(C) of Resolution 1333 (2000).
- (d) The European Union List Implementing Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

### **9. Solicitations by Suppliers**

All suppliers shall comply with all guidelines issued by MK relating to access to MK facilities, offices, and employees. No Supplier shall use MK's computer system, including its electronic mail system and internet site, for the purpose of sending unsolicited electronic mail messages to the MK community. Suppliers must receive prior written authorization from MK's Supply Management Department to hold trade shows, demonstrate products, utilize MK resources (i.e., bulletin boards), or make unsolicited calls on MK departments.

### **10. Monitoring and Compliance**

Suppliers shall conduct audits and inspections to ensure their compliance with this Supplier Code of Conduct and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier agrees to notify the MK Supply Management Department as to its plans to remedy any such non-compliance.

MK or its representatives may engage in monitoring activities to confirm Supplier's compliance to this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires or report cards, review of publicly available information, or other measures necessary to assess supplier's performance.

The Supplier Code of Conduct prohibits the use of forced and child labor. Each direct supplier is evaluated at the time of selection for its compliance with the Code of Conduct and certifies annually to its compliance with the Code of Conduct and our policy on forced and child labor. MK sourcing personnel as a part of their standard periodic reviews of suppliers enquire as to compliance with the company's forced and child labor policy and suppliers are subject to audit to verify compliance. MK conducts a limited number of supplier compliance audits each year using both internal personnel and third-party independent auditors. Failure to comply with the Code of Conduct may result in a curtailment or termination of the supplier relationship.

Any MK supplier or MK employee that becomes aware of violations of this policy is obligated to notify the MK Supply Management Department. Based on the assessment of information made available to MK, MK reserves the right (in addition to all other legal and contractual rights) to disqualify any potential supplier or terminate any relationship with any current supplier found to be in violation of this Supplier Code of Conduct without liability to MK. If you would like to file a confidential report under the terms of this policy, please contact The Network at 888 840 2387. For locations outside the USA and Canada, please call collect at 770 582 5209. You may also choose to file a report using our confidential, [Web-based Internet reporting tool](#). This reporting tool is staffed by our vendor partner "The Network" and anonymity is guaranteed.

### **Application/Exclusions**

This Supplier Code of Conduct is a general statement of MK's expectations with respect to suppliers. This Policy should not be read in lieu of, but in addition to, any supplier obligations as set forth in any:

- (a) Request for proposal or other solicitation.
- (b) Agreements by and between MK and the Supplier. In the event of a conflict between this Policy and any MK solicitation document or applicable agreement, the terms of the MK solicitation or agreement shall control.

No exclusions are applicable to this policy.