



HNI MEMBER CODE OF INTEGRITY

# Integrity

**It's How We're Made**



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## Message from the Chairman, President, and Chief Executive Officer

**A**s HNI continues to grow, we build on the solid foundation that all members are treated equally and respectfully. Our core beliefs foster our unique member-owner culture and remain central to who we are today.

Integrity starts with me and you. We shape our culture every day, through our decisions, words, and actions. As we manage challenges—both the big ones and the smaller ones—it's important that we respond in a way that honors our principles.

Our Code of Integrity is a helpful resource to living our core beliefs. It sets our expectations and serves as a useful guide to

find advice when facing difficult decisions. I encourage you to raise concerns and report problems as they arise. When you speak up, we can resolve issues before they become more serious, and we make our workplace, culture, and company stronger.

I am proud of what we accomplish together and, more importantly, I'm proud of how we make it happen. As we continue to build upon this foundation, our commitment to our core beliefs ensures future success. Thank you for all you do.



Jeff Lorenger





# Our Vision, Commitment, and Core Beliefs

## Our Vision

We, the member-owners of HNI Corporation, exist to enhance where people work, live, and gather.

## Our Member Commitment

We will:

- Create long-term value for shareholders, stakeholders, and customers
- Be a great place to work
- Be responsible global citizens

## Our Core Beliefs

Our success depends on living our core beliefs every day. We believe in:

### RELENTLESS FOCUS ON CUSTOMERS

In everything we do, the customer comes first. We help our customers succeed because we believe their goals are our goals.

### ALWAYS A BETTER WAY

Built around Rapid Continuous Improvement (RCI) and the belief we all have something unique and valuable to contribute every day, we view problems as opportunities waiting to be uncovered and actively participate in finding solutions.

### SHARED RESPONSIBILITY AND REWARDS

We hold ourselves accountable for results and win together. As company owners, we are trusted to make decisions that improve our business.

### POSITIVELY IMPACTING THE PLANET

We strive to sustainably use natural resources, minimize our footprint on the environment, and conduct business in ways that are good for the planet today and for generations to come.

### FAIRNESS AND RESPECT

We operate in a spirit of cooperation. We value treating each other honestly and with fairness and respect. We do what is right for HNI and for one another.

### INTEGRITY WITHOUT COMPROMISE

How we do business is important to us. We believe in always doing the right thing. We hold ourselves and others to the highest standards in all we say and do.

### A COMMUNITY FOR EVERYONE

Everyone is welcome. We value using each other's differences in experiences and ideas to solve problems and better serve our customers. We strive to improve the communities where we work and live.



# Our Code, Our Responsibilities

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## Our Code of Integrity

Welcome to the HNI Member Code of Integrity. Read on to learn how our core beliefs inform our Code and policies.

### INTEGRITY: IT'S HOW WE'RE MADE

HNI was founded on the principles of fairness and respect. As empowered members, we all share responsibility for living our core beliefs. We also share in the rewards of our long-standing commitment to integrity—better results, customer success, a great place to work, and a company we can all be proud to work for. Throughout our history, Our Vision and integrity have set us apart. It's how we're made. And it's how we'll make our future.

### HOW TO USE THE CODE

Read our Code and become familiar with our policies. In particular, learn the policies that apply to your role. Keep the Code on hand to consult when you have questions. In moments of uncertainty, our Code can provide guidance. It can point you to our policies, and it offers resources for reporting concerns. Along with members, managers, and Member and Community Relations (MCR), our Code will help you make sound decisions and stay true to Our Vision.





## Our Responsibilities

Every member at HNI has an important role to play. Though our roles vary, we trust each other to make decisions in accordance with our Code.

### OUR CODE APPLIES TO EVERYONE AT HNI

We are all responsible for following our Code, our policies, and the law. Our Code applies to all members, officers, and directors of HNI, as well as contractors. Violations of our Code can have serious consequences, up to and including termination of employment.

### WE ARE ALL RESPONSIBLE FOR INTEGRITY

We believe in integrity without compromise. We are all responsible for doing the right thing, always. We hold ourselves to the highest ethical standards in all we say and do.

### MANAGERS HAVE ADDITIONAL RESPONSIBILITIES

As leaders, managers set an example. This means they have a responsibility to make HNI a great place to work. Managers must:

- Treat all members with fairness and respect
- Encourage members to raise concerns without fear of retaliation
- Listen to members' concerns and ensure they are handled appropriately
- Facilitate solutions and seek compromise where appropriate
- Address or escalate concerns and violations of our Code, our policies, or the law in a timely manner
- Ensure an inclusive workplace, free of bias



## Making Ethical Decisions

Even with the Code as a resource, sometimes making the right decisions can be difficult. In situations that present an ethical challenge, ask yourself these questions.

- **Is this choice legal? Does it comply with federal, state, and local laws and regulations?**
- **Does this choice comply with our Code and policies? Is it in alignment with HNI's values?**
- **Would I feel comfortable if this action was made public? Would it improve HNI's business or reputation?**

If the answer to any of these questions is no or you are unsure, do not proceed. Consult with your manager, Member of Community relations, or the Law Department to find a better solution.

Only after considering all three sets of questions should you make a decision. The best decisions are legal, in accordance with our core beliefs, and good for HNI's business and reputation.

### EMPOWERED ACCOUNTABILITY

**Q:** What if I need to discuss a labor issue with other members? Don't I have a right to talk about workplace conditions?

**A:** Yes. We respect and follow the National Labor Relations Act (NLRA). Members have the right to discuss labor issues in person, on social media, or anywhere else. Nothing in our guidelines for ethical decision making or communication is intended to interfere with these rights. We also encourage you to communicate any concerns with your local Member & Community Relations (MCR) or leadership team. For more information on raising concerns or seeking help, please see p. 39.

## Ethics and Compliance at HNI

Our Ethics and Compliance Program ensures that we uphold our Code and follow the law. Our Code establishes the guidelines that our Ethics and Compliance Program helps to monitor and, where necessary, enforce.

Our Ethics and Compliance Program can also help members who need to raise concerns. See the "Seeking Help, Speaking Up" section of this Code for more information.





# Our Members: Made with Integrity

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## Keeping Workplaces Safe, Healthy, and Secure

### What We Believe

Member safety is our top priority. Nothing is more important than keeping each other safe, healthy, and secure. We strive for a zero-harm workplace, and we foster a culture of awareness.

### How We're Made

We work together to ensure all accidents are prevented. Each day, all our members should get home safely to their families. We ensure this happens when we:

- Follow safety rules
- Complete necessary training prior to performing work tasks
- Take responsibility for safe working conditions
- Report any potential health and safety risks, accidents, or injuries
- Do not work under the influence of alcohol and drugs
- Strive for physical and mental wellness

### SAFETY APPEAL PROCEDURE

We foster a culture where all members are responsible for safety and are supported to operate safely. We are all empowered to promote safety for ourselves and our fellow members. Every member can and should stop a work task they feel is unsafe, including tasks for which they have not been trained, and should refer to the Safety Appeal Procedure.

### Beyond the Code

[Click here to access policies.](#)



## EMPOWERED ACCOUNTABILITY

**Q:** One of my team members sometimes cuts corners on safety. He's experienced, so he knows the risks. Should I say anything?

**A:** Yes. First, talk to the team member respectfully about your safety concerns. If this has no effect, discuss the issue with your manager. You may also contact your MCR Manager or Safety Manager. We are all responsible for safety, and we never look the other way when safety violations occur.

**Q:** One of our team members is on vacation, and I've been scheduled to cover some of his workload. The problem is, I've never been trained on that kind of work, and it involves heavy machinery. I don't want to let anyone down, so I'm nervous about bringing up safety concerns. What should I do?

**A:** Follow our Safety Appeal Procedure and raise the issue with your manager. You should not perform a work task you have not been trained for, and you are not required to do so. If you ever feel unsafe about work, you are empowered to raise a concern. Make sure your manager, MCR Manager, or Safety Manager understand the situation so that you get the training you need to do the job safely.

The graphic is a white hexagon with a black border. At the top center is the HNI CORE logo, which consists of a red square with 'HNI' and a grey hexagon with 'CORE'. Below the logo, the text 'SAFETY PHILOSOPHY' is written in large, bold, black, sans-serif capital letters. Underneath this, a paragraph of text reads: 'Together, we are guided by our **CORE** commitment to **ZERO HARM** and have this responsibility to our members, the environment, and the communities we serve. This goal is aspirational and should be inspiring to all leaders and members in our organization.' Below the paragraph is a list of six safety principles, each in a black rounded rectangle with white text: 'Have a safety-first mindset every day', 'Be responsible for your own safety and the safety of others around you', 'Successfully complete safety trainings and apply the learnings', 'Identify and escalate all safety concerns or hazards', 'Immediately report near misses, accidents, or work-related injuries', and 'Follow safety rules as a condition of employment'. At the bottom of the hexagon is the 'ZERO HARM' logo, where 'ZERO' is in large, bold, black, sans-serif capital letters and 'HARM' is in smaller, black, sans-serif capital letters.

**HNI CORE**

# SAFETY PHILOSOPHY

Together, we are guided by our **CORE** commitment to **ZERO HARM** and have this responsibility to our members, the environment, and the communities we serve. This goal is aspirational and should be inspiring to all leaders and members in our organization.

- Have a safety-first mindset every day
- Be responsible for your own safety and the safety of others around you
- Successfully complete safety trainings and apply the learnings
- Identify and escalate all safety concerns or hazards
- Immediately report near misses, accidents, or work-related injuries
- Follow safety rules as a condition of employment

**ZERO HARM**





# Embracing a Community for Everyone

## What We Believe

At HNI, everyone is welcome. Differences in members' experiences and ideas help us better serve our customers. Together, we are stronger, more creative, and better able to meet challenges and solve problems.

## How We're Made

We support a community for everyone when we:

- Cultivate inclusive work environments that support all members in reaching their full potential
- Celebrate our members' unique characteristics and talents
- Actively seek out diverse perspectives
- Base hiring decisions only on valid job requirements and qualifications
- Ensure fair treatment and equal access to opportunity, information, and resources



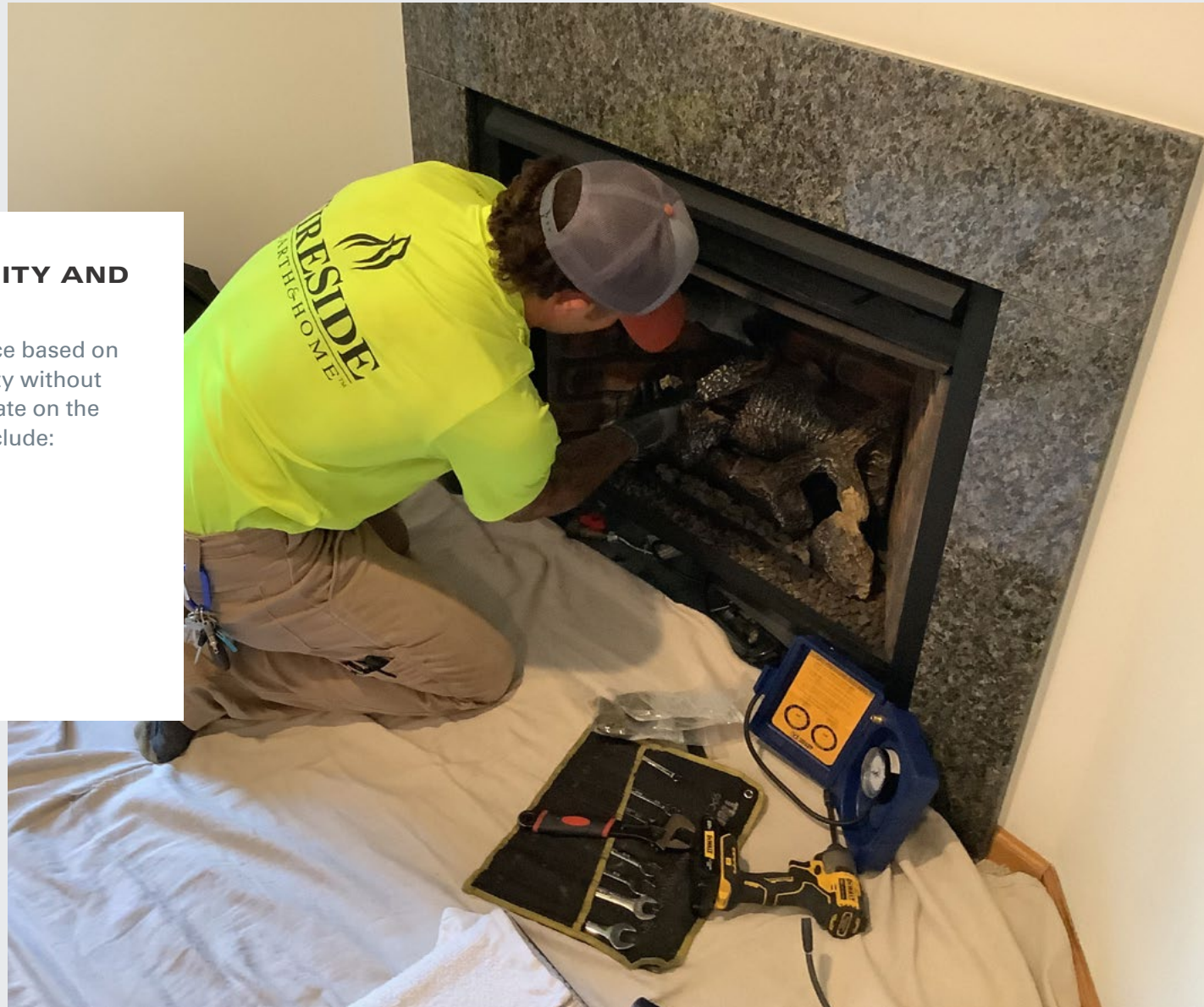
**Beyond the Code**

[Click here to access policies.](#)

## EQUAL EMPLOYMENT OPPORTUNITY AND ANTI-DISCRIMINATION

Fairness means giving everyone an equal chance based on merit. We ensure equal employment opportunity without discrimination of any kind. We do not discriminate on the basis of protected characteristics. These can include:

- Sex
- Race, color, or ethnicity
- Age
- Disability
- Veteran status
- Citizenship or national origin
- Religion





## Supporting a Respectful Workplace

### What We Believe

We work with a spirit of cooperation, treating each other with dignity and respect. Harassment and bullying have no place at HNI, and we take action to prevent such behavior so that all feel welcome.

### How We're Made

We support a respectful workplace when we:

- Treat fellow members with honesty, dignity, fairness, and respect at all times
- Listen to each other
- Refrain from using language that others may find offensive or intimidating
- Speak up if we witness or experience harassment or bullying
- Respect others' physical space, and never inappropriately touch or make suggestive gestures toward others
- Demonstrate support for one another through our words and actions, and never demean, intimidate, or threaten others

### IDENTIFYING HARASSMENT

Harassment can come in many forms. It can be:

- Our words—for example, saying or writing slurs or stereotypes
- Our actions—for example, unwelcome touching or blocking someone's path
- Our visual displays—for example, pulling up offensive images online

The intention behind harassment does not matter. At stake is how others perceive or react to the words, actions, or visuals.

### Beyond the Code

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## Protecting HNI's Reputation

### What We Believe

Over decades, HNI has built a strong reputation, and our customers and business partners have come to expect quality and integrity from us. Our reputation is one of our greatest assets. We win business with it, and we have a shared responsibility to protect it.

### How We're Made

We protect HNI's reputation when we:

- Hold ourselves accountable for delivering great products and services
- Act in accordance with our core beliefs in all professional relationships, inside and outside of HNI
- Assess risks to our operations and reputation before acting
- Avoid disparaging or joking about the quality of our products and services
- Follow all laws, policies, and procedures that apply to our business

### EMPOWERED ACCOUNTABILITY

**Q:** I noticed that a team member posted something about HNI to social media. The post made some mean-spirited jokes about one of our newer product lines. I don't know if the member was upset about something, but the post made me uncomfortable. What should I do?

**A:** Contact your MCR Manager immediately and provide a link to the post. Harm to our reputation could harm our business.

### Beyond the Code

[Click here to access policies.](#)

# Our Company: Built with Integrity

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# Securing Our Information Assets and Systems

## What We Believe

Our information assets and systems are key to thriving as a company. They help us communicate, collaborate, and cooperate. We share a responsibility for using these assets with care, and for business purposes only.

## How We're Made

We secure our information assets and systems when we:

- Use information assets first and foremost for job duties
- Use assets and systems in a way that is consistent with HNI's values and does not interfere with job performance
- Access only those parts of the system we need for our jobs
- Protect assets from unauthorized access by using strong passphrases and following good cybersecurity practices
- Report lost, stolen, or damaged equipment immediately
- Ensure only authorized users have access to our information assets
- Exercise caution when reviewing digital communications, taking care not to open suspicious emails or click on suspect hyperlinks
- Follow all policies and procedures related to passwords and access to information

## EMPOWERED ACCOUNTABILITY

**Q:** A member of my team has been using his company laptop to stream videos during downtime. I didn't think much of it at first, but then I noticed my own network connection was a lot slower. I asked other team members, and they all said the same thing: their connections were slower too. This is making it more difficult to complete my job because applications are lagging and files are taking more time to load. What should I do?

**A:** Your coworker is using company assets in a way that interferes with the team's productivity, which is against company guidelines. Talk to this member and remind them of our policy. Explain how their video streaming is impacting the team. If you are not comfortable talking to your coworker, or if it has no effect, discuss the matter with your manager or MCR.

## Beyond the Code

[Click here to access policies.](#)

# Protecting Confidential, Proprietary, and Private Information

## What We Believe

Our confidential and proprietary information helps set us apart and best serve our customers. Protecting it builds trust and safeguards strategic goals. We must all handle this information responsibly.

## How We're Made

We protect our confidential, proprietary, and private information when we:

- Sign and honor our Confidentiality, Non-Solicitation, and Invention Assignment Agreement
- Mark all confidential materials with "confidential," "attorney-client privileged," or other appropriate labels
- Use caution when sharing information with others outside the company and, when needed, seek guidance or approval first
- Share potentially sensitive information only with members who are authorized to use it for business purposes
- Take appropriate security measures, including passwords and encryption
- Immediately decline any unsolicited confidential or proprietary information offered to us from a competitor or business partner, and report any such incidents to a manager or the Law Department
- Use good judgment about where and when we discuss confidential information, never doing so in public or in a manner that would expose the information to those who are not privy to it

## Beyond the Code

[Click here to access policies.](#)

## OUR CONFIDENTIAL BUSINESS INFORMATION

Confidential information can take many forms. These include:

- Industrial and product designs
- Trademarks and other intellectual property
- Nonpublic financial information such as pricing and projections
- New product and marketing plans
- Research and development
- Manufacturing processes
- Customer and supplier lists
- Legal opinions and other attorney work products

## BENCHMARKING

At times, HNI may conduct benchmarking of best practices. We do this in partnership with other organizations, and with full approval from management. We are very careful about the information we share when benchmarking. We never disclose confidential information, and we avoid topics relating to market segmenting, prices, and trade restraints. (See also “Competing Honestly and Fairly.”)

## MEMBER INFORMATION

We protect the privacy of our members. HNI may need to collect personally identifiable information (PII) as part of the employment process. We follow all PII privacy laws and safeguard the security of member PII. This is one way we do what is right for HNI and for each other.

## EMPOWERED ACCOUNTABILITY

**Q:** I recently received an email from a former HNI member. She’s at a new company now, but we worked on a number of projects together when she was still at HNI. She was curious about some of the work she produced while at HNI and what had happened with it. At first, I thought she was being nostalgic, but then she asked me to send copies of some of the documents and presentations she had produced. I haven’t gotten back to her because I’m worried about sharing confidential HNI information. What should I do?

**A:** You are right to be concerned. The work the former member completed at HNI is proprietary HNI information. We never share such information except for business purposes, on a need-to-know basis, and with proper approval. Tell the former member that you cannot share confidential HNI information, and contact the Law Department for further guidance. (See also “Competing Honestly and Fairly.”)

## Maintaining Accurate Records and Accounts

### What We Believe

Our records and accounts help us measure our impact as a business, and they inform our planning for the future. We always keep these records complete and accurate. As a publicly traded company, HNI must also maintain timely and truthful records for investors.

### How We're Made

We maintain accurate records and accounts when we:

- Retain company records in accordance with policies and procedures
- Accurately and promptly record all business transactions, never making false or misleading entries in our books or records
- Follow all generally accepted accounting principles, internal controls, and laws and regulations
- Keep honest, detailed, and accurate records of HNI funds and assets, never setting up unrecorded or secret cash funds or assets for any reason
- Report any errors or misstatements to a manager
- Cooperate fully with any audit or investigation

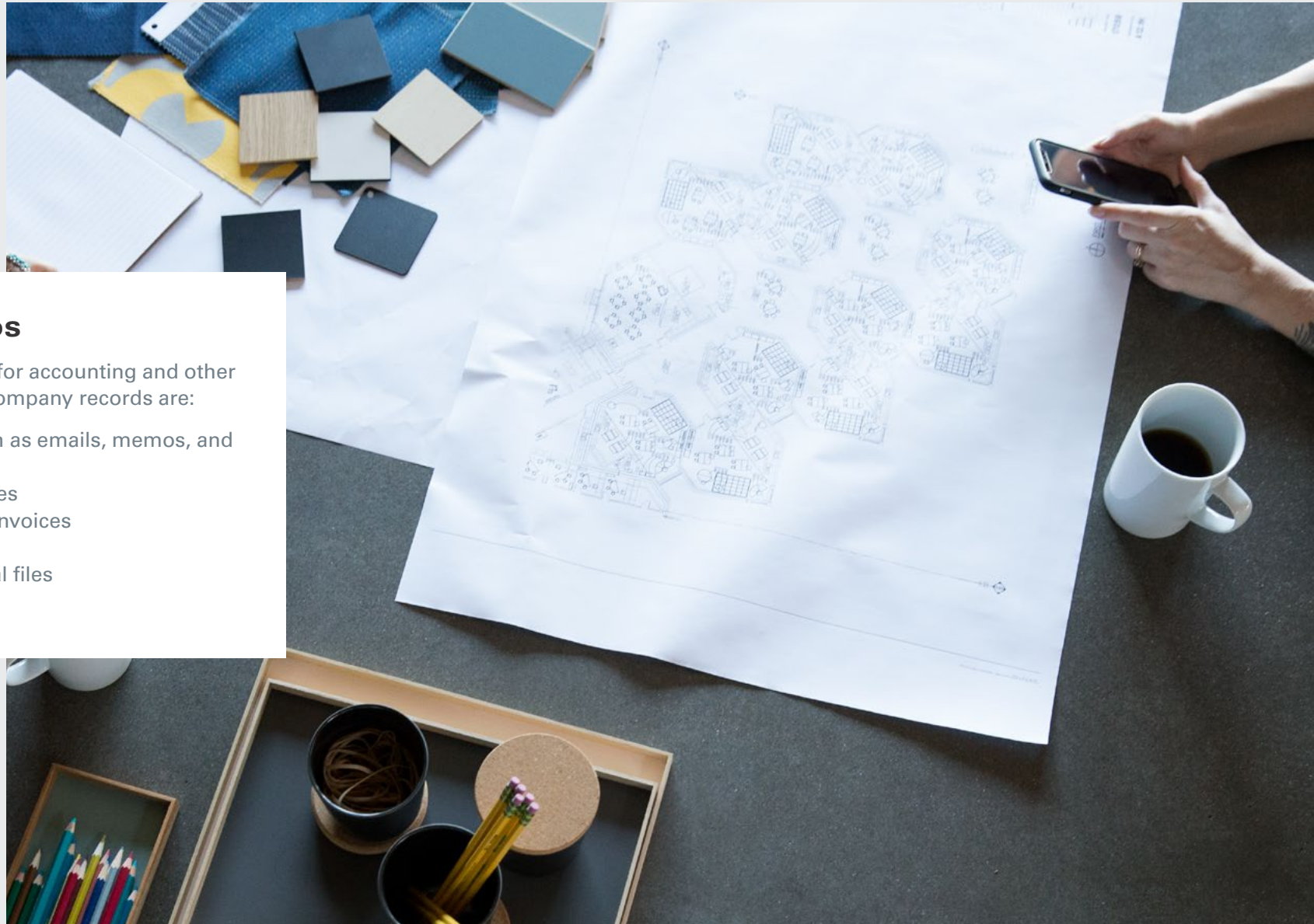
### EMPOWERED ACCOUNTABILITY

**Q:** I recently started a new position at HNI, and it has been going well! My predecessor, though, left a lot of hard-copy notes and other documents in the office that's now mine. I've looked through some of them, and they are not relevant to anything HNI is doing now. In fact, some date back to the time of my predecessor's predecessor! Is there any reason to keep all these documents? Can I go ahead and shred them to make some space in my new office?

**A:** You must follow our Records Management Policy. Though many of these documents appear to be out of date, HNI may be required to hold them for a specified time period. Organize the documents and decide which to shred based on our records retention schedules. This is the best way to keep our records in order for both business and legal purposes.

### Beyond the Code

[Click here to access policies.](#)



## COMPANY RECORDS

HNI records are important for accounting and other purposes. Some kinds of company records are:

- Correspondence, such as emails, memos, and social media posts
- Policies and procedures
- Purchase orders and invoices
- Contracts
- Personnel and medical files
- Company reports



## Ensuring Fair Trading

### What We Believe

We believe in a level playing field for all investors. We never share material, nonpublic information with anyone who may use it to trade securities. This could lead to insider trading, which is against the law and could have serious consequences for HNI or any involved HNI member.

### How We're Made

We ensure fair trading when we:

- Refrain from trading HNI securities (including making adjustments to HNI stock funds within your 401(k)) when in possession of material, nonpublic information about the organization
- Refrain from trading in the securities of any other company when in possession of material, nonpublic information
- Protect material, nonpublic information from inappropriate disclosure by sharing it internally only with members who need to know for business purposes—and by never sharing it with anyone outside HNI (even family and friends)
- Refrain from “tipping,” or passing along inside information to someone who may use that information to trade securities
- Respect free and fair market activity, never attempting to manipulate the price of a stock by spreading false information

### EMPOWERED ACCOUNTABILITY

**Q:** I'm very close with my sister. We tell each other everything. I just got very good news about HNI's expected earnings—better news than I thought—and I'm excited to share. Can I tell my sister?

**A:** If the earnings information is not public, then you cannot share it, even with your sister. Any changes to expected earnings, whether the news is good or bad, would be of interest to an investor. We never share material, nonpublic information, even with close family and friends.

### Beyond the Code

[Click here to access policies.](#)

## MATERIAL, NONPUBLIC INFORMATION

In the course of our work, we may learn details about HNI or a business partner that could be of interest to investors. This is called **material, nonpublic information** or **inside information**. Examples include:

- Proposed acquisitions, sell-offs, or joint ventures
- Significant changes in anticipated earnings
- Upcoming changes to dividends
- Major research or regulatory developments relating to significant products or processes
- Proposed major financing by HNI involving sale of stock or other securities

If the public does not yet know, we cannot act on it. We never share such information outside HNI because it could lead to insider trading.





## Communicating about HNI

### What We Believe

We serve our customers best when we speak with one voice. To this end, only certain members speak on behalf of HNI. These members specialize in communicating with the public. Our relationships with all our stakeholders, including business partners and investors, benefit from this approach.

### How We're Made

We best communicate about HNI when we:

- Represent HNI positively and truthfully
- Politely forward outside requests for comment from HNI to the appropriate members
- Speak on behalf of HNI only if we are expressly authorized to do so
- Use HNI social media accounts responsibly, respectfully, and only for an assigned business purpose

### SOCIAL MEDIA

Social media is a powerful tool, and we recognize that it can help spread the word about our products and services. We must be careful, though, to use it responsibly. This means remembering to protect sensitive information and always share respectfully. In addition, we must distinguish our own personal posts and views from those of HNI.

### Beyond the Code

[Click here to access policies.](#)



# Our Customers: Partnering with Integrity

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# Managing Potential Conflicts of Interest

## What We Believe

A conflict of interest can arise when a member's personal interests may be at odds with those of HNI. We avoid such conflicts because they can affect how we make business decisions. Objective business decisions are always best for our business.

## How We're Made

We avoid conflicts of interest when we:

- Make objective business decisions in the best interests of HNI
- Remain alert for situations in which a conflict of interest could arise
- Disclose immediately any situation that may be a real or perceived conflict of interest
- Seek advice from a manager or the Law Department if we are unsure about a possible conflict of interest
- Remove ourselves from business decisions whenever a conflict of interest may exist
- Only accept nominal gifts from business partners (e.g., a business lunch)

## UNDERSTANDING CONFLICTS OF INTEREST

We win together when we put the interests of HNI first. Even the appearance of a conflict of interest can harm our reputation. For this reason, we should be aware of some of the areas where a conflict of interest can occur. For example:

- Family and friends—having a family member or significant other who reports to you
- Outside employment—consulting for an HNI competitor
- Outside business ownership—owning a stake in an HNI supplier
- Outside service—serving on the board of a nonprofit that HNI works with

Always report any possible conflict of interest that may affect you. Full disclosure can usually lead to a solution.

## Beyond the Code

[Click here to access policies.](#)

## GIFTS AND ENTERTAINMENT

We believe in building strong business relationships, and we may at times give or receive small gifts in the course of doing business. But we never give or accept gifts that could affect our business judgment.

The following expectations apply:

- Never ask for gifts
- Never accept cash, gift cards, or any cash equivalent
- Never accept gifts or entertainment from a potential business partner that we are evaluating
- Only accept gifts and entertainment for a proper business purpose
- Accurately document any gifts we accept
- Never offer gifts of any value to government officials without prior approval

## PERSONAL RELATIONSHIPS

We trust members to make personal choices that are right for them, and we respect member privacy. However, where a conflict of interest could exist, members need to disclose personal information. This applies to romantic relationships among HNI members as well as any family members we may hire or do business with.

## EMPOWERED ACCOUNTABILITY

**Q:** My cousin works for a supplier of hearthstones and other fireplace and furnace components. It seems like a really great company. Can I recommend it to HNI?

**A:** To recommend this company to HNI, you must first disclose that your cousin works there. Then you must remove yourself from any decisions about contracting with this company. We avoid even the appearance of a conflict of interest when making business decisions.

**Q:** My team has been working closely with an HNI supplier on a recent project. The manager of the supplier's team invited me on a weekend ski trip. I asked her the cost, and she said that it was a gift. Her company wanted to give me something a little extra for all the work I had put in to make the project work. She said she would be there, along with a handful of people from her company. Should I go?

**A:** No. Though this may be a generous gesture on the part of the supplier, it may also be an attempt to gain improper influence. The ski trip has no business purpose, and it is likely expensive. You should politely decline and discuss the matter further with your manager and the Law Department. We never accept gifts or entertainment that might appear to influence our business judgment.

## Conducting Business with Integrity

### What We Believe

How we do business is important to us. We build business relationships based on trust and transparency. Business partners around the world, including governments, rely on our high standards of integrity. Corruption of any kind has no place at HNI.

### How We're Made

We conduct business with integrity when we:

- Keep honest, detailed, and accurate records of HNI funds
- Engage government officials openly and honestly, never offering anything of value to gain a business advantage
- Refrain from accepting or offering bribes or kickbacks
- Immediately report any concerns about an improper payment
- Follow all trade laws, wherever we do business

### EMPOWERED ACCOUNTABILITY

**Q:** As a supply chain manager, I work with HNI business partners from around the world. Recently, a representative from one of our suppliers informed me of trouble they were having moving materials through their country. I asked what had changed, and she said that the government had passed new regulations. She added that to meet these regulations, she would need extra payments. When I pressed her on what the extra payments would go to specifically, she had trouble giving details. HNI has worked with this supplier for years, so I want to assume good faith. But something doesn't seem right. What should I do?

**A:** You are right to be concerned. The supplier may be asking for a facilitation payment or funds to bribe a government official. With your team, conduct further due diligence on this supplier, and research changes to the law in its country. Never make payments outside of an established contract. In addition, contact the Law Department and explain your situation. They will provide further guidance.

### Beyond the Code

[Click here to access policies.](#)

## BRIBERY AND OTHER IMPROPER PAYMENTS

A **bribe** is an improper payment made to gain a business advantage. Bribes are often made to public officials to allow illegal business practices. A **facilitation payment** is a sum paid to speed up a routine process or procedure. A **kickback** is a payment made in return for some business favor or advantage. All such payments are unethical and illegal in most countries.

**Anything of value**, such as a gift, can be considered a payment. We never make improper payments in the course of business. Such practices could seriously harm HNI's reputation, and they can also have legal consequences.

## DOING BUSINESS WITH GOVERNMENTS

Serving government customers is both a privilege and a great responsibility. Because governments spend public money, work requirements may be more stringent than in the private sector. We take these requirements seriously, and we remain true to our core beliefs. In all we do, the customer comes first. This is just as true for governments as for any of our other customers.

## INTERNATIONAL TRADE

As a global company, we follow all trade laws, wherever we do business. These laws can vary by country. To ensure we are in compliance, we:

- Learn the regulations before shipping across borders
- Never do business with entities on U.S. or European embargo or sanctions lists
- Alert the Law Department if a business partner asks HNI to participate in a boycott





## Competing Honestly and Fairly

### What We Believe

We win business through our relentless focus on our customers, and we compete with integrity in the marketplace, always. A fair marketplace is a healthy marketplace for all. We create value by always looking for a better way, and we never seek unfair advantages.

### How We're Made

We compete honestly and fairly when we:

- Follow all competition and antitrust laws, wherever we do business
- Refrain from discussing pricing, markets, or anything else with competitors that could be seen as limiting competition
- Immediately report to the Law Department any attempts by competitors to engage HNI in anticompetitive practices
- Make only accurate statements about our products, services, or competitors
- Obtain competitive information only legally, through public sources

### EMPOWERED ACCOUNTABILITY

**Q:** At a recent trade conference, I ran into an old coworker. Of course I'm at HNI now, and he's also at a new company. After catching up a bit, he told me that his company offered a lot of the same products as HNI. He asked if I might be interested in talking further about how our companies set prices. He even suggested that we might be able to help each other this way. I said I would think about it, but wouldn't this be price fixing?

**A:** Yes, it sounds like your old coworker was suggesting a price-fixing arrangement. Such practices are unethical and illegal. They create uncompetitive markets that are bad for consumers and businesses. In addition, how HNI sets prices is confidential. We never share this information with competitors, or anyone else. Contact the Law Department for further guidance, and never discuss price fixing in any way. (See also "Protecting Confidential, Proprietary, and Private Information.")

### Beyond the Code

[Click here to access policies.](#)



## Providing Safe and High-Quality Products

### What We Believe

We exist to enhance where people work, live, and gather. We achieve this mission by providing safe, high-quality products. Nothing is more fundamental to our business than quality.

### How We're Made

We ensure that we provide safe, high-quality products when we:

- Keep our workplaces clean, safe, and efficient
- Promote consumer safety and product quality as top priorities
- Pay attention to potential quality and safety issues throughout the product lifecycle, including initial design, modifications, surveillance testing, and discontinuation
- Immediately report quality or safety issues with our products
- Take action to address and resolve any quality or safety issues with our products
- Follow all quality and safety controls, procedures, and protocols



### Beyond the Code

[Click here to access policies.](#)

## Working with Suppliers and Other Third Parties

### What We Believe

The quality of our products depends on healthy business partnerships. We do business with suppliers and other third parties who meet our high standards for quality and value. These partners must also share our belief in integrity without compromise.

### How We're Made

We ensure healthy relationships with suppliers and other third parties when we:

- Treat all business partners fairly, regardless of the business value of the relationship
- Choose partners who best meet our business needs and values
- Avoid even the appearance of a conflict of interest when selecting business partners
- Respect our partners' confidential information, never sharing it without permission
- Communicate openly and honestly to address issues and find solutions

## RESPECTING HUMAN RIGHTS

We treat all people with dignity and respect, wherever we do business, and we do not compromise on human rights. We ensure fairness in our supply chains when we:

- Only work with business partners who are committed to fair labor standards
- Never use child or prison labor, anywhere in the world
- Immediately report any human rights concerns or violations we may find

### Beyond the Code

[Click here to access policies.](#)



# Our Communities: Engaging with Integrity

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## Building a Sustainable Future

### What We Believe

Sustainability has no endpoint. We are continuously improving our processes to reduce our impacts on the natural world. The success of our business relies on a clean, sustainable future for all. That's why positively impacting the planet is one of our core values.

### How We're Made

We build a sustainable future when we:

- Use materials and energy efficiently, recycle, and seek innovative solutions to eliminate waste, reduce energy use, and reduce air emissions
- Consider and minimize our environmental impact through changes to process, equipment, or material selection
- Meet or exceed all environmental standards and obligations that apply to us, regardless of production or cost considerations
- Complete all environmental trainings that apply to us
- Follow all policies, procedures, and laws related to sustainability and the environment

### OUR COMMITMENTS

HNI has established clear sustainability goals. We are making real progress. Some highlights include:

- Significantly increasing renewable energy purchases and reducing emissions
- Removing hundreds of thousands of pounds of expanded polystyrene (nonrecyclable) foam packaging
- Implementing energy reduction initiatives such as LED lighting and repairing compressed air leaks across our manufacturer facilities

### Beyond the Code

[Click here to access policies.](#)

## EMPOWERED ACCOUNTABILITY

**Q:** I've noticed that we don't always recycle at our manufacturing facility. I see pallets and other materials thrown into the garbage. Is there something I can do?

**A:** We need all members' help to be more sustainable. Though it may take more time, recycling is always the best choice. If you need support, contact the Environment, Health, and Safety (EHS) department or person responsible for sustainability at your site, or submit a member improvement idea.

**Q:** My team is working to procure resources in a country where we have never done business. How do we get a better idea of the environmental regulations there?

**A:** Environmental regulations can vary greatly between countries. At HNI, we are committed to following procedures for compliance and supporting sustainability in all business decisions. Contact the Law Department to learn more about the environmental regulations in the country where you are trying to establish business. We always follow our environmental standards, even if they are higher than those in the country where we are working.



## Engaging with Our Communities

### What We Believe

We have an obligation to support and improve the communities where we live and work. As a company, HNI supports education and other causes in the communities where we operate. We also work to address broader challenges in countries where we do business. We can all make a positive impact, both as members and outside HNI.

### How We're Made

We best engage with our communities when we:

- Volunteer for charitable causes in communities where we live and work
- Request approval before engaging in charitable or volunteer activities that may affect work schedules, and ensure the activity does not interfere with our work
- Respect the beliefs and involvements of others, and never pressure members to volunteer or contribute to our favored causes

### CHARITABLE GIVING

We believe in sharing our success with the communities where members live and work. HNI has donated widely and generously through our charitable foundations. Typical contributions include:

- Grants toward causes important to our members and their families, such as healthcare, education, and community development
- Supporting local spaces and furnishings in community buildings
- Awarding scholarships to members' children for post-secondary education programs
- Encouraging member participation in community clean-up days, meal packing for the hungry, youth mentorship programs, and many other outreach programs

### Beyond the Code

[Click here to access policies.](#)

## Participating in Political Activities

### What We Believe

HNI believes in a healthy democratic process, and we all have a right to participate in this process. Doing so can have a positive impact on our communities. To make the best possible difference, we always approach politics with our high standards of integrity.

### How We're Made

We best participate in political activities when we:

- Make it clear that our personal political views are not those of HNI
- Support all members' right to vote
- Conduct political activities on our own time, without letting it interfere with our work
- Respect the politics of others, without disparaging or pressuring members to change their views
- Avoid using company funds to make political contributions of any kind
- Keep from using company facilities or resources for political activity or fundraising
- Avoid or disclose any potential conflicts of interest that may arise from seeking or holding public office
- Lobby on behalf of HNI only if specifically authorized by the Law Department to do so

HNI limits its own political activity and may at times express opinions on public issues. Only authorized HNI leaders may make such statements on behalf of the company.

### EMPOWERED ACCOUNTABILITY

**Q:** One of my team members is very excited about a candidate for local office. He has placed cards about this candidate in the lunchroom and has several posters in his workstation. What are the rules on this? Can he start putting up posters in my work area too?

**A:** No. Inform the member that political literature in the work environment is against policy, or if you prefer, contact Member and Community Relations. Though we all have a right to our views, we must keep those views from interfering with our work.

### Beyond the Code

[Click here to access policies.](#)

# Seeking Help, Speaking Up

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**40** Speaking Up

## Seeking Help

Treating one another with fairness and respect is one of our core values. When there are issues or problems in the workplace, each member shares the responsibility to report them and to be part of the solution to resolve them in a fair manner.

To ensure prompt handling when problems occur, the following procedure has been developed:

### FIRST STEP

If you have a problem, you should discuss the matter with your immediate supervisor. Usually that person can resolve the problem quickly. If you prefer, you may contact your Member and Community Relations (MCR) Manager for assistance. The problem will be investigated, and you will be promptly advised of the findings and the decision.

If the problem cannot be resolved in the first step, you may take the second step.

### SECOND STEP

You should meet with the next level of management, your immediate supervisor's manager.

If needed, you may bring the matter higher up the chain of management (up to and including the General Manager, or the top management member at your location) for further discussion and resolution.

Your MCR Manager should be involved to help you and the manager in defining the problem, providing background information, identifying related issues, and reaching a resolution. You will be notified promptly by MCR, or the manager with whom you discussed the issue, of the resolution.

If you feel a satisfactory decision is not reached in the second step, you may go to the third step.

### THIRD STEP

At this step, your MCR Manager will arrange a review of your issue with your organization's most senior leader (for example, company President) or Vice President of Member and Community Relations. They will review the issue and previous decisions. A decision will be made promptly.

### FOURTH STEP

If, after having exhausted the first three steps as previously noted, you still feel that a fair and equitable resolution has not been reached, you may contact either the HNI CEO, General Counsel, or Vice President of Member and Community Relations. You can reach these individuals by calling the HNI front desk at 563-272-7400. A final decision will be made after discussion and investigation of the matter.



## Speaking Up

Speak Up is a system put in place to encourage members to report, in a confidential way, incidents of theft, fraud, accounting irregularities, and other integrity issues that may be difficult to raise in person with your supervisor, leadership, or MCR team. Speak Up also allows you to report other issues, including those related to safety and fair treatment. If you feel you have a serious issue of this nature, contact Speak Up at 800-321-5378 or at [www.SpeakUp.HNICorp.com](http://www.SpeakUp.HNICorp.com). Remember that Speak Up is not a substitute for our long-standing problem resolution process, described above. Speak Up is a safety valve for problems that have not or cannot be resolved through the normal steps.

- In India, Speak Up can be reached by calling 000-117. After hearing a voice say "AT&T," dial 888-475-4618.
- In Mexico, Speak Up can be reached by calling 001-800-892-1662.
- In any HNI location, Speak Up can be reached online at [www.SpeakUp.HNICorp.com](http://www.SpeakUp.HNICorp.com).

## ANONYMITY AND CONFIDENTIALITY

We respect member privacy. To the fullest extent possible, HNI will protect the identity of members who choose to remain anonymous. In some cases, remaining anonymous may limit our ability to make a complete investigation. We will always keep details of investigations as confidential as we can.



## WHAT HAPPENS WHEN I MAKE A REPORT?

We take all reports of misconduct or violations of our Code seriously. HNI will conduct a thorough investigation, and you will be contacted about your report as part of the process. Results of the investigation will lead to consequences, where necessary.

## HNI DOES NOT RETALIATE

HNI relies on members to cooperate in our reporting process. All members should feel safe speaking up. We never retaliate against anyone who raises a concern in good faith. Proven retaliation is a violation of our Code and will result in disciplinary action.

### FORMS OF RETALIATION

These include any of the following actions taken as a result of a member raising a concern or cooperating with an investigation:

- Termination, demotion, or suspension
- Denial of benefits, promotion, raise, or bonus
- Threats
- Unrealistic performance requirements
- Negative performance reviews
- Exclusion from social activities

## CONSEQUENCES OF NON-COMPLIANCE

We expect all members to follow this Code, the law, and any applicable regulations. Members found to be non-compliant will face consequences, up to and including termination of employment. In some cases, there could be legal penalties for HNI and/or the individuals involved.





As member-owners, we all share a responsibility to uphold our core beliefs. Our Code is a blueprint for bringing our core beliefs to life, offering practical guidance on how to do the right thing—every day, everywhere. It informs our empowered accountability, helping us make better choices for a better tomorrow. Integrity: it's how we're made.



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