

Collective
& Personal

Integrity

*integrit*y (in teg' r ɪ te) n.

1. the quality or state of being of sound moral principle; uprightness, honesty, and sincerity. 2. an uncompromising adherence to a code of moral values or conduct.



HNI Corporation Hotlines:

Law Department 1.563.264.7123

**Member Safety and
Environmental 1.563.262.7865
or 1.800.321.5378**

**Discrimination/Harassment/
Offensive Behavior/Violent
Behavior 1.800.321.5378**

CONTENTS

OUR VISION	2
-------------------	----------

A LETTER FROM THE CHAIRMAN	3
-----------------------------------	----------

OUR CULTURE OF INTEGRITY	4
---------------------------------	----------

OUR GUIDELINES	
WORKING WITH CUSTOMERS, SUPPLIERS, AND GOVERNMENT	
<i>Proper Business Practices</i>	6
<i>Political Activity</i>	7
FAIR COMPETITION	
<i>Antitrust & Trade Regulation</i>	8
<i>Proprietary & Confidential Information</i>	9
BEING A GREAT PLACE TO WORK	
<i>Fairness and Respect in the Workplace</i>	12
<i>Safety, Health & Environmental Protection</i>	13
<i>Appropriate Use of Communications Equipment</i>	14
BUSINESS INTEGRITY	
<i>Protection and Proper Use of Company Assets</i>	16
<i>Conflicts of Interest</i>	16
<i>Corporate Opportunities</i>	17
<i>Inside Information & Trading in Securities</i>	18
<i>Internal Controls</i>	20
<i>Public Reporting</i>	22

KEY COMPANY POLICIES	23
-----------------------------	-----------

INDEX	26
--------------	-----------

OUR VISION

We, the members of HNI Corporation, are dedicated to creating long-term value for all of our stakeholders, to exceeding our customers' expectations, and to making our company a great place to work. We will always treat each other, as well as customers, suppliers, shareholders, and our communities, with fairness and respect.

Our success depends upon business simplification, rapid continuous improvement, and innovation in everything we do, individual and collective integrity and the relentless pursuit of the following long-standing beliefs:

WE WILL BE PROFITABLE. We pursue mutually profitable partnerships with customers and suppliers. Only when our company achieves an adequate profit can the other elements of this Vision be realized.

WE WILL CREATE LONG-TERM VALUE FOR SHAREHOLDERS. We create long-term value for shareholders by earning financial returns significantly greater than our cost of capital and pursuing profitable growth opportunities. We will safeguard our shareholders' equity by maintaining a strong balance sheet to allow flexibility in responding to a continuously changing market and business environment.

WE WILL PURSUE PROFITABLE GROWTH. We pursue profitable growth on a global basis in order to provide continued job opportunities for members and financial success for all stakeholders.

WE WILL BE A SUPPLIER OF QUALITY PRODUCTS AND SERVICES. We provide reliable products and services of high quality and brand value to our end-users. Our products and services exceed our customers' expectations and enable our distributors and our company to make a fair profit.

WE WILL BE A GREAT PLACE TO WORK. We pursue a participative environment and support a culture that encourages and recognizes excellence, active involvement, ongoing learning, and contributions of each member; that seeks out and values diversity; and that attracts and retains the most capable people who work safely, are motivated, and are devoted to making our company and our members successful.

WE WILL BE A RESPONSIBLE CORPORATE CITIZEN. We conduct our business in a way that sustains the well being of society, our environment, and the economy in which we live and work. We follow ethical and legal business practices. Our company supports our volunteer efforts and provides charitable contributions so that we can actively participate in the civic, cultural, educational, environmental, and governmental affairs of our society.

TO OUR STAKEHOLDERS: When our company is appreciated by its **members**, favored by its **customers**, supported by its **suppliers**, respected by **the public**, and admired by its **shareholders**, this Vision is fulfilled.

LETTER FROM THE CHAIRMAN

Dear HNI Corporation Members,

Our Vision on the preceding page compels us toward a competitive excellence that begins and ends with ethical conduct. Our integrity — both individual and collective — is the foundation of our business success and should be reflected in everything we do.

As members of HNI Corporation, we are recognized for dealing fairly and respectfully with customers, suppliers, fellow members, and shareholders. This tradition is tested in each business transaction we carry out.

Our culture of collective integrity depends upon:

- TREATING OTHERS WITH FAIRNESS AND RESPECT.
- BEING OPEN, HONEST, AND TRUSTWORTHY.
- FOLLOWING ALL LAWS AND REGULATIONS.

Nothing is more important than preserving our Company's reputation for integrity. No competitive pressure, no order from a superior, no concern about "making the numbers," or opportunity for personal gain will excuse unethical behavior.

Management members have a special responsibility to make compliance a vital part of our business efforts. Adherence to the Company's policies and applicable law is at the core of each manager's duty to the Company.

If you have a question about what is proper conduct for you or anyone else, raise your concern through one of the channels the Company makes available to you. Your concerns about appropriate conduct will be addressed promptly.

We are members of one of the best companies in the world. We must uphold and continue a great tradition—an unbending allegiance to integrity and ethical conduct.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Askren', with a long horizontal flourish extending to the right.

STAN A. ASKREN

Chairman, President and Chief Executive Officer

Integrity. It seems like a simple word with a simple meaning: to adhere to a code of values. The concept of integrity, however, is not simple.

HNI Corporation is comprised of members who have personal integrity: individual codes of values and conduct that guide our personal lives.

But we are one Company. It is essential, therefore, that we, as members of our Company, share a common code of values in order to have integrity in all our business dealings.

The purpose of this booklet is to focus our thoughts on integrity as applied to the way we conduct business. It is intended to raise our awareness and stimulate discussion about the topic among ourselves.

How does personal integrity differ from business integrity? Usually personal integrity will be consistent with business integrity. There are many common elements, such as being honest and fair.

There are other times, however, when an appropriate response in personal relations may not be the appropriate response in business. For example, in one's private life, one may freely accept or return a personal favor. When conducting business for our Company, however, it may not be appropriate and actually may be against our policy to return a *personal* favor to another by doing business with the individual or that person's company.

HNI Corporation has a long and enviable history to guide us regarding what is right as we represent our Company now and in the future.

Many resources are available to help us with our decisions. Our Vision and Company policies are a good place to start. Our own experiences should also be considered. We should never hesitate to ask for guidance from others or to share with others in the Company what we think is a correct course of action.

There is also a process that each of us should follow in order to ensure our culture of integrity:

STEP ONE

Determine what is right and wrong in a business situation. This requires knowing the rules and getting the facts straight.

STEP TWO

Act with the intention of doing what you believe to be right for the Company.

STEP THREE

Disclose what you are doing and that you are acting on your understanding of what is right for the Company. Open disclosure is the easiest way to avoid a hidden conflict of interest.

Integrity guides how we interpret our policies and how we act when faced with a situation not specifically addressed in a particular policy. No single policy can possibly cover all conceivable situations. But each of us has the ability to find the facts and apply our reasoning powers to a problem. A member who has integrity acts with the intention of doing what is right after examining the facts of a situation and reaching reasoned conclusions.

Although we are never expected to act in a way that conflicts with our sense of personal integrity, we are obligated, if such a conflict arises, to discuss the conflict with our supervisor or another manager. This communication is vital. It will enable us to resolve an issue, which in unusual circumstances may even involve making an exception to or changing our policy.

If we believe someone is acting in a way that is inconsistent with the spirit or letter of our policies, we should raise the issue with a manager and encourage the person to change the behavior. If the behavior does not change, we should contact the HNI Corporation Law Department or Member and Community Relations Department.

This is a process that each of us should follow in order to ensure our culture of integrity. It deserves and requires a commitment of time and careful consideration. Making good ethical decisions is our collective responsibility, but it begins with each individual.

Proper Business Practices

It is HNI Corporation's policy that its members act in all business situations in an honest and ethical manner. We should strive at all times to be a good corporate citizen and to achieve competitive excellence in a manner consistent with the applicable laws and regulations of any city, state and country in which we conduct business.

Accordingly, when acting as members of HNI Corporation, we will, under all circumstances:

1. Engage only in lawful and ethical behavior in relation to all business activities.
2. Use Company funds for legitimate business purposes, avoiding at all times receiving from or giving to an existing or potential customer or supplier any *personal* benefit, money, favor, or payment.
3. Not offer, authorize or make a payment on behalf of the Company to a political party or candidate.
4. Not offer anything of value to any government official to obtain for the Company any benefit to which the Company is not otherwise entitled.
5. Record all transactions accurately and fully in the Company's books and records.

Q

WHAT IF PROVIDING A "PERSONAL BENEFIT" TO A SUPPLIER OR CUSTOMER REPRESENTATIVE IS THE ONLY WAY I CAN MAKE A SALE FOR THE COMPANY?

A

No sale is worth it to the Company, and no payment or gift exceeding nominal value or lavish entertainment to any individual is permitted. The Company competes based upon quality, delivery and price and expects the same from its suppliers. If in doubt, make sure your actions are part of an authorized marketing program or seek guidance from a manager.

Q

WHAT DOES THE COMPANY CONSIDER "NOMINAL" VALUE?

A

The Company has designated \$25 as a standard for "nominal" gifts. Most items marked with a company's logo are considered to be of nominal value. According to the Internal Revenue Service (IRS) rules, gifts in excess of \$25 may be considered taxable items to the person receiving them, so keep this in mind as well.

Q

IS IT OKAY TO ACCEPT A SMALL "PERSONAL BENEFIT" ³/₄ SUCH AS LUNCH OR SPORT TICKETS ³/₄ FROM SOMEONE WORKING FOR A COMPANY WITH WHICH WE DO BUSINESS?

A

The safest policy is not to accept if you are unsure. Never ask for such a benefit. If a small benefit is offered, accept only if you can reciprocate, and don't accept repeated offers.

Political Activity

It is the policy of this Company to encourage all members to become involved in the political process as private citizens.

The Company does, from time to time, make its position known on proposed legislation and issues of public concern affecting the Company. As a Company, however, we do not support specific political parties or candidates. We make no corporate campaign contributions of any kind.

The Company will:

1. Not contribute to political parties or candidates.
2. Not pay honoraria to public officials, except in rare cases for appropriate purposes approved by the HNI Corporation Law Department.
3. Provide information to members on proposed legislation and public issues that could affect our business, our members and shareholders or the geographic areas in which we operate.
4. Express views directly or through trade associations, industry groups, or other coalitions in support or in opposition to proposed legislation and public issues that may affect the Company.

Q

DOES OUR POLICY MEAN I CANNOT PERSONALLY CONTRIBUTE TO A CANDIDATE'S CAMPAIGN FOR ELECTION?

A

No, it only means you cannot use the Company's money to do so. You, of course, can make a personal donation to any candidate of your choice. The point is that any political affiliation you have is personal and cannot be represented as the Company's affiliation.

Q

MAY I RUN FOR OFFICE?

A

Of course. All members are encouraged to become involved in the political process, either by supporting the candidate of your choice or by running for office. However, remember, if you are elected, you are acting as an individual, and never as a Company spokesperson.

Q

WHAT IF I AM ELECTED AND ASKED TO CONSIDER MATTERS THAT AFFECT THE COMPANY?

A

First check any applicable rules that govern your elected position. Those rules may require that you not participate in those matters. In the absence of any rules, the decision is based on your good judgment as an elected official.

Antitrust & Trade Regulation

The intention of antitrust laws is to promote competition by prohibiting unreasonable restraints of trade and other anti-competitive behavior. Our Company's policy is to strictly comply with U.S. antitrust laws and foreign laws governing competition.

These laws prohibit conduct, such as formal or informal agreements or understandings with a competitor, to fix prices or stabilize or control prices or other conduct that cannot be justified by legitimate business purposes.

Antitrust laws also prohibit agreements with competitors or customers that unreasonably restrain trade. It is illegal to allocate production or territories with competitors, agree to boycott or refuse to deal with specific customers or suppliers, or agree with others to limit production.

The Robinson-Patman Act prohibits sales at different prices to competing customers who resell the product. It also prohibits receiving prices that violate the Act.

Whether or not an agreement or other competitively restrictive conduct violates the antitrust laws, or particular pricing terms violate the Robinson-Patman Act, often depends upon an intensive, factual analysis. The HNI Corporation Law Department should be consulted regarding proposed conduct or transactions that raise potential trade regulation issues.

In order to ensure that we comply with antitrust laws, we will:

1. Not engage in any discussion or enter into any agreement or understanding, including by telephone, correspondence, at meetings or otherwise, with a competitor with respect to prices, terms of sale, production limitations, or allocation of products, customers or territories.
2. Not agree with others to refuse to do business with certain customers or suppliers.
3. Avoid product-pricing policies that raise Robinson-Patman Act concerns.
4. Contact the corporate Law Department with any questions concerning conduct or transactions that raise potential antitrust issues.

Q

HOW CAN I BECOME FAMILIAR WITH ANTITRUST LAWS? HOW DO I DETERMINE IF A PRICING POLICY COMPLIES WITH THE ROBINSON-PATMAN ACT OR MAY BE DEFENDED AS MEETING COMPETITION?

A

A pamphlet entitled, "The Competitive Market, A Guide for Compliance with the Antitrust and Trade Regulation Laws," is available to all members through the corporate Law Department.

Proprietary & Confidential Information

Proprietary and confidential information is knowledge developed or acquired by the Company that is not publicly available. This information often affects our competitive position and must be protected against disclosure, theft or inadvertent loss.

Proper Handling and Marking

Proprietary and confidential information, or trade secrets, includes technical, financial and other business information such as research results, manufacturing techniques, cost data, marketing strategies, financial budgets, and long-range plans. All information on our computer system, including E-mail, is also Company property and should always be treated as confidential. This information is very valuable—it may have cost the Company as much as the buildings in which we work or the machines that make our products.

We must always protect our proprietary rights by marking important materials as "Confidential." Members asking for legal advice from the corporate Law Department should label their letters as "Attorney—Client Privileged and Confidential" to ensure full protection for legal advice being given.

Information is difficult to protect. We must rely upon members' loyalty, integrity and vigilance to keep our proprietary information secure. Don't provide business information to outsiders unless specifically authorized to do so. Be alert to informal telephone surveys or benchmarking efforts that request the Company's proprietary and confidential business information, such as sales figures, labor rates, and material costs. Some people make a living by obtaining and selling confidential information through these informal and seemingly harmless methods.

Unsolicited Ideas

We should be especially careful when we receive an unrequested idea from an individual outside of the Company. Sometimes a novel suggestion or unsolicited invention is submitted to us that is very similar to a new process or product the Company has already developed or is developing. Unless handled with care, this could result in an unfair allegation that the Company used the unsolicited idea and owes that individual money.

We have a formal procedure for handling unsolicited ideas in order to protect us from possible legal claims. If you have questions, consult the HNI Corporation Law Department immediately to assist you with the right way to handle unsolicited ideas.

Proprietary & Confidential Information

Benchmarking

We are not prohibited from asking for or receiving "benchmarking" ideas from other companies about ways to reduce costs, improve efficiency, and similar topics. However, we should ask only for the kind of information that we are willing to share with our benchmarking partner. In other words, if we are uncomfortable sharing certain of our information, we should not ask our partner for it.

Benchmarking presents a unique set of legal and ethical challenges. During benchmarking, we should avoid discussions that could be viewed as an allocation of markets or customers, price fixing, or other restraints of trade. We should use what we learn only to improve our operations, increase efficiency, and reduce costs. We should treat the information we receive in confidence and should never disclose the name of our partner without permission.

Gathering Information About Competitors

General business information about competitors, customers and vendors is also important in our efforts to improve productivity and ensure product quality. We must, however, use proper methods to obtain information about competitors.

It is acceptable to make full use of competitive, technical and market information about other companies only if it is disclosed in formal presentations at public meetings, in filings with governmental agencies, or in publicly available sources. We must be sure that there is no notification either that the information is proprietary, or that a confidential relationship is being breached. If there is such a notice, leave any meeting you are in or otherwise refuse the information.

For similar reasons, it is unacceptable to interview or hire employees of competitors, customers, or vendors for their knowledge of proprietary information of present or former employers.

In order to protect our Company's proprietary information, each member will:

1. Sign and honor the Member Patents and Confidential Information Agreement.
2. Follow the Company's policies on protecting confidential documents and disclosing proprietary information.
3. Upon receiving an unsolicited design, other invention or novel idea from individuals outside the Company, make no evaluation, return it unopened (if possible) to the sender until—if desirable—an appropriate legal agreement has been executed.

Proprietary & Confidential Information

4. Disclose proprietary information only to those outside parties who have been approved by management and then only after they agree in writing not to disclose to third parties and not to use the information in an unauthorized or unethical manner.

Q

WHAT IS CONFIDENTIAL INFORMATION?

A

Any information about us or our customers not known publicly, that could help a competitor compete with us or be harmful to us or our customers, if disclosed. Examples include how we make our products, what our products cost, our business relations with vendors and suppliers, and our strategic business plans and financial projections. If you are not sure in a given situation, be cautious, and do not disclose the information until you have sought management guidance.

Q

WHAT SHOULD I DO IF I AM ASKED TO DISCUSS CONFIDENTIAL INFORMATION CONCERNING MY FORMER EMPLOYER'S BUSINESS?

A

Honor your obligation with your former employer to protect its confidential information.

Q

IF I LEAVE THE COMPANY, WILL OTHER EMPLOYERS BE AS CONCERNED ABOUT CONFIDENTIALITY AGREEMENTS?

A

You have given your word to this Company to keep a most important confidence even after you have left, and the Company trusts you to do that.

Fairness and Respect in the Workplace

The Company strives to develop a culture where members, customers, suppliers, shareholders and the public experience fairness and respect in their relations with the Company. The Company is also committed to providing a safe work environment for members and visitors.

We will not tolerate discrimination against any individual because of sex, race, age, religion, color, creed, disability, ancestry, national origin, veteran status or other protected status under applicable law.

We will not tolerate work-related harassment, offensive behavior, behavior that is inappropriate for the workplace, violence or threatening behavior.

In order to provide a work environment where members and visitors experience fairness and respect:

1. We will create a work environment where unlawful discrimination, harassment, offensive behavior and violent behavior are not tolerated; and
2. The member will contact Member and Community Relations personnel or the corporate Law Department where experts in this area are available to assist with any questions and concerns.

Q

HOW SHOULD I ATTEMPT TO RESOLVE AN ISSUE OF DISCRIMINATION, HARASSMENT, OFFENSIVE BEHAVIOR OR VIOLENT BEHAVIOR?

A

Report the incident or complaint to any of the following:

- ***Your supervisor; or***
- ***Member and Community Relations Representative, or***
- ***MySafeWorkplace at 1-800-321-5378 or www.mysafeworkplace.com.***

You also have the right to tell the person engaging in the conduct to stop at once, but you need not confront him/her if you are not comfortable doing so.

Safety, Health & Environmental Protection

Safety, health, and environmental laws and regulations play an important role in the way the Company conducts its business.

In addition to manufacturing and production, the packaging, marking, handling, storage, transportation, and disposal of raw materials, products and wastes are regulated. Even the marketing of our products may be affected by various environmental laws.

The Company has an active safety and environmental program. Each member's safety is everyone's concern and priority. Learn the rules of the workplace and follow them.

Safety and environmental laws and regulations impose on both individuals and companies severe criminal, civil and administrative penalties when violations occur. Individuals who violate these laws and regulations also risk Company sanctions, including appropriate disciplinary actions, up to and including dismissal.

To promote safety, health and environmental protection, we will:

1. Follow the Company's Member Safety Program and procedures.
2. Ask a supervisor when in doubt concerning safety and environmental obligations and specific safety procedures or environmental permit requirements as well as other legal or Company requirements that may affect our jobs.
3. Follow the Company's Environmental Policy committing us to meet or exceed applicable environmental standards to protect soil, air and water.
4. Strictly adhere to internal policies and correctly complete permit applications. Submit in a timely manner only duly authorized, complete and accurate information in response to applicable safety and environmental law, regulation and permit requirements.
5. Consult the corporate Law Department whenever a question arises about the meaning or application of safety and environmental laws.

Q

WHERE CAN I OBTAIN A COPY OF THE COMPANY'S SAFETY AND ENVIRONMENTAL POLICIES?

A

You can obtain these policies from the environmental site on the Company intranet, your site safety and environmental managers, or your supervisor. Your site safety and environmental managers can provide all information concerning general safety and environmental obligations as well as specific permit requirements.

Q

TO WHOM MAY I REPORT POSSIBLE VIOLATIONS?

A

Report to your site managers who, in turn, will involve the corporate managers of safety and environmental matters at HNI Corporation.

Appropriate Use of Communications Equipment

The Company provides many of us with communications equipment, which we are to use to perform our jobs. Because communications equipment can be used for many other purposes besides conducting business for the Company, the Company has established a policy titled, *Member Conduct Related to Usage of Communications Equipment*. Under the Policy, "Communications Equipment" may include (but is not limited to) telephones, cellular phones, facsimile machines, computers, pagers, personal digital assistants, wireless internet access devices, modems, E-mail access, company-run computer networks and company-provided internet access.

In order to comply with the Policy, we will use Communications Equipment primarily for the Company's business purposes. We may use the Communications Equipment for limited personal use provided that such use:

1. Does not in any way interfere with our job performance.
2. Does not incur additional cost to the Company.
3. Does not interfere with the use of communication systems.
4. Is not related to our business activities outside of the Company.
5. Is not contrary to any law, policy or this booklet.

Prohibited Uses

We will not use company-owned Communications Equipment to access, display or send any material that:

1. Is pornographic, sexually oriented, vulgar, obscene or otherwise offensive to a person of reasonable sensibility.
2. Violates any applicable laws.
3. Is confidential information of the Company or others (unless authorized by the Company to do so as part of our job).

In addition, in order to comply with the Policy, we will not use company-owned Communications Equipment for:

1. Soliciting of any kind, except as expressly permitted by the Company.
2. Posting to message boards and participating in chat groups that are intended to discuss the Company.
3. Using the E-mail system in ways that are disruptive or offensive to others, or in ways that are inconsistent with the professional image of the Company, such as, distributing non-business related E-mails (including chain letters, jokes, etc.) or sending E-mail messages to large groups of members unless there is legitimate business reason for such message.
4. Misrepresenting, obscuring, suppressing or replacing a user's identity on an electronic communication system or constructing an electronic communication so that it appears to be from someone else.

Appropriate Use of Communications Equipment

The Company may monitor or audit use of Communications Equipment and any records of such use to determine compliance and may take disciplinary action for any violation, including immediate termination of employment.

Q

CAN I USE E-MAIL FOR *PERSONAL* USE?

A

Personal use of e-mail is discouraged. However, some personal use is permitted if it complies with the Policy.

Protection and Proper Use of Company Assets

We have access to and use of Company equipment and assets. Theft, carelessness, and waste of Company assets have a direct impact on our profitability and should be avoided. Any suspected incident of fraud or theft should be immediately reported to a supervisor or, if appropriate, a more senior manager for investigation. We carefully safeguard our confidential information. Unauthorized use or distribution of confidential information is prohibited and could also be illegal, resulting in civil or even criminal penalties. For a further description of our policy concerning confidential information, see "Fair Competition—Proprietary & Confidential Information" above.

Conflicts of Interest

Conflicts of interest are those instances when member personal or financial considerations either directly affect, or could be perceived by others as affecting, whether and how the Company does business.

It is every member's duty to avoid any personal relationships or financial interests that might create even the appearance that we as individual members have conflicting loyalties or are motivated by personal gain in conducting the Company's business. When this occurs, or could have the appearance of occurring, it is crucial that we disclose the information to Company officials. For example, members should disclose to appropriate Company officials when we or our family members have a direct or indirect financial interest or employment relationship with a competitor, supplier or customer of the Company or any of its divisions or subsidiaries. (There are instances when such a relationship is legal, ethical and, therefore, acceptable, but it must be known by Company officials.) Advance disclosure is the best solution—it protects everyone.

We are also expected to devote our entire working time to the performance of our duties to the Company. This is what we are paid to do. Anything that diverts interest, talent and time away from the Company is to be avoided.

In order to protect members and the Company from conflicts of interest, we will:

1. Report any ownership interests in any company with which we do business (any interest in a private company and any stock interest exceeding one percent of the total outstanding stock in a publicly traded company).
2. Request approval from management or (in the case of corporate and subsidiary officers) the Board of Directors before entering into any outside business or consulting activity since it might detract from our loyalty and/or service to the Company.
3. Refrain from serving on a board of directors of any for-profit organization without the express approval of the Company's management or (in the case of corporate and subsidiary officers) the Board of Directors.

Conflicts of Interest

4. Not place ourselves in a position where we feel an obligation to conduct business with an organization as the result of receiving *personal* gifts or favors.

Conflicts of Interest

Q

WHAT SHOULD I DO IF A GIFT WITH A GREATER THAN NOMINAL VALUE (i.e., \$25) IS SENT TO ME?

A

Gifts that are unacceptable should be returned to the sender with a letter of explanation. If you believe returning the gift would cause embarrassment, your supervisor should be consulted and agree to a proper disposition of the gift to an approved charity, if appropriate. A letter should then be sent in appreciation, explaining our gift policy and a description of where the gift was ultimately sent.

Q

DOES ACCEPTING AN INVITATION FOR ENTERTAINMENT POSE A CONFLICT OF INTEREST SITUATION?

A

Lavish entertainment, business meals, or outings may create feelings of obligation and cause conflicts of interest. On the other hand, contacts in a social setting involving modest expense can contribute to good working relationships and can be acceptable. It is important that these situations can be and are reciprocated in kind. Use your common sense, but when in doubt, ask your supervisor for his or her advice on the situation.

Q

IF I WANTED TO REQUEST PERMISSION TO CONSULT OUTSIDE THE COMPANY, WHO WOULD BE THE APPROPRIATE CORPORATE OFFICER TO GIVE PERMISSION?

A

If you are a manager of the Company, you need written permission of the person to whom you report. If you are an officer of the Company, you are required to have permission from the Board of Directors.

Corporate Opportunities

We do not personally take opportunities that are discovered through the use of Company property, information or position without the prior consent of the Board of Directors. Our directors, officers and employees are also prohibited from competing with the Company.

Inside Information & Trading in Securities

HNI Corporation common stock is traded on the New York Stock Exchange under the symbol HNI and is registered with the Securities and Exchange Commission (SEC). The Company is required to make filings with the SEC at least once a quarter about its business and financial results. It also issues press releases and makes SEC filings about important events whenever they arise. All information contained in these releases and filings is public information about the Company. All other business information available to members is non-public or inside information.

State and federal laws prohibit trading in common stock or options for stock while in the possession of material inside information. "Material inside information" is any information relating to our Company that has *not* been disclosed to the public, and there is a substantial likelihood that a reasonable shareholder would consider it important in making an investment decision. Any member, not just officers or managers, may at times possess inside information that is material. In such a case, he or she may not buy or sell the Company's stock until the information is made public or time passes and the information is no longer relevant.

Examples of events that may be considered material include: proposed major acquisitions, sell-offs and joint ventures; significant changes in current or anticipated earnings; upcoming dividend changes; major research or regulatory developments relating to significant new products or processes; proposed major financing by the Company involving sale of stock or other securities; substantial purchases, sales, or write-offs of assets; major contractual arrangements; changes in pricing of key product lines that would have a material effect on earnings; and major developments in litigation.

The securities laws also apply to any trading by any member in the stock or options of any other company when in possession of material inside information about that company that has been provided to HNI Corporation on a confidential basis.

The U.S. Securities and Exchange Commission has given high priority to enforcement of the insider trading laws. Violators can be required to pay civil penalties of up to three times the profit gained or the loss avoided by making an unlawful purchase or sale while possessing material inside information or by unlawfully communicating such information to another, including a spouse or child and other relatives and friends, if a trade results. Violators are also subject to civil suits by parties who are damaged by the violation. In addition, criminal penalties for such violations can result in substantial fines or imprisonment.

Inside Information & Trading in Securities

To comply with all the laws protecting inside information and trading in securities, we as members will:

1. Not communicate material inside information to others, including spouses, children, and friends and will not ourselves purchase or sell Company common stock or options until such information has been publicly disclosed by the Company and the investing public has had sufficient time to learn of and digest the information.
2. Refrain from trading or advising others about trading in securities of any other company when in possession of any material inside information received by our Company on a confidential basis from that company.
3. Consult with the Vice President, General Counsel and Secretary (if you are an officer of the Company, a division, or a subsidiary) before trading in HNI Corporation common stock, except for *routine purchases* under Company "qualified" plans.

Q

IF I'M AN HOURLY MEMBER, MIGHT I HAVE "INSIDE INFORMATION"?

A

Yes. You don't have to be a financial officer or even a manager to have information that could give you an unfair advantage in trading Company stock. Anyone in the Company might at some time have "inside information."

Q

DO I HAVE SPECIAL OBLIGATIONS IF I AM AN OFFICER OF HNI CORPORATION?

A

Yes, the securities laws place special restrictions on "executive officers" of the Company concerning the timing of buying and selling Company stock. Our policies also require all corporate officers of HNI Corporation to alert the corporate Vice President, General Counsel and Secretary and to receive clearance before trading in the Company's common stock. The corporate Law Department has prepared a special document on "SEC Compliance." All corporate officers should be familiar with the contents of this document.

Q

WHY CAN'T I TRADE ON INFORMATION I'VE LEARNED ABOUT ANOTHER COMPANY?

A

Because trading while possessing any material inside information (no matter how received) about any public company is illegal.

Internal Controls

As our Company grows larger and more decentralized and diverse, an effective and consistent system of administrative and accounting controls is critically important for accurate reporting of the Company's financial results to its shareholders and is required by law. We refer to these systems as internal controls.

Internal controls include maintaining books and records, reporting business transactions promptly and accurately and ensuring that only properly authorized actions are taken. The purpose of internal controls is to provide reasonable assurance that the Company's assets are protected and properly used. They act as a system of checks and balances to help ensure that administrative and accounting policies are followed consistently throughout the entire Company. In addition to being a good business practice, the Company policy on internal controls also promotes compliance with the securities and tax laws.

Management members are responsible for internal controls in their areas of responsibility. They must assure that all assets and transactions are recorded on the Company's books and records in accordance with proper accounting practices and procedures. Management members may not allow any unrecorded or "off book" funds or accounts to be established or maintained for any purpose, nor permit records to be falsified in any manner.

In fulfilling this obligation, management members and other members with these responsibilities must:

1. Establish reasonable procedures for carrying out Company policies and preventing deviations.
2. Ensure that business transactions and access to Company assets are conducted only by members who are properly authorized.
3. Make sure that business transactions are recorded in writing promptly and accurately on the Company's books and records in order to ensure that its financial statements fairly reflect all business activities.
4. Protect Company data that is transmitted and/or stored electronically from disasters, misuse and unauthorized access through measures such as appropriate back-up systems, firewalls and effective disaster planning.

Internal Controls

Q

IF MEMBERS IN MY DEPARTMENT WANT TO KEEP A FUND FOR SPECIAL OCCASIONS IS THAT ALLOWED?

A

The Company does not permit any unrecorded or "off book" funds to be established or maintained with Company resources for any purpose.

Q

WHY IS IT SO IMPORTANT THAT ALL DESCRIPTIONS OF TRANSACTIONS BE COMPLETE AND ACCURATE?

A

The Company's internal control policies are designed to avoid any misleading or erroneous assumptions or statements while preparing or verifying financial records and therefore we must take special care when describing all transactions. The Company's financial reports become an important part of the general mix of information available to the public trading in the Company's common stock.

Public Reporting

We are a public company and as a result file reports and other documents with the Securities and Exchange Commission (SEC) and the stock exchanges on which our securities trade. As well, we issue press releases and make other public statements that include financial and other information about our business, financial condition and results of operations. We endeavor to make full, fair, accurate, timely and understandable disclosure in reports and documents we file with, or submit to, the SEC and in our press releases and public communications.

We require cooperation and open communication with our internal and outside auditors. It is illegal to take any action to fraudulently influence, coerce, manipulate, or mislead any internal or external auditor engaged in the performance of an audit of our financial statements.

The laws and regulations applicable to filings made with the SEC, including those applicable to accounting matters, are complex. While the ultimate responsibility for the information included in these reports rests with senior management, numerous other employees participate in the preparation of these reports or provide information included in these reports. We maintain disclosure controls and procedures to ensure that the information included in the reports that we file or submit to the SEC is collected and communicated to senior management in order to permit timely disclosure of the required information.

If you are requested to provide, review or certify information in connection with our disclosure controls and procedures, you must provide the requested information or otherwise respond in a full, accurate and timely manner. Moreover, even in the absence of a specific request, you should report any information that you believe should be considered for disclosure in our reports to the SEC.

If you have questions or are uncertain as to how our disclosure controls and procedures may apply in a specific circumstance, promptly contact your supervisor or a more senior manager. We want you to ask questions and seek advice.

KEY COMPANY POLICIES

Some of our key policies that cover areas relating to our business integrity are listed below. Read them. Be familiar with their purpose and meaning. Follow them.

When you have read this booklet, sign the form included in this booklet and return it to your Member and Community Relations manager. This will be your personal commitment to support the business integrity of HNI Corporation.

POLICY	NUMBER
WORKING WITH CUSTOMERS, SUPPLIERS & GOVERNMENT	
<i>Proper Business Practices</i>	01LEG-06-004
<i>Political Activity</i>	01HMR-05-003A
<i>Doing Business with Government Agencies</i>	01LEG-02-004
FAIR COMPETITION	
<i>Antitrust & Trade Regulation Compliance</i>	01LEG-06-001
<i>Obtaining Competitive Information</i>	01LEG-06-003
BEING A GREAT PLACE TO WORK	
<i>Equal Employment Opportunity</i>	01HMR-01-004
<i>Fairness and Respect in the Workplace</i>	01HMR-01-002A
<i>Member Conduct Related to Usage of Communications Equipment</i>	01HMR-05-010
<i>Member Safety Program</i>	01PRO02-01-012
<i>Environmental Policy</i>	01ADM-09-001A
BUSINESS INTEGRITY	
<i>Avoiding Conflicts of Interest</i>	01LEG-06-002
<i>Security Trades by Company Personnel</i>	01LEG-08-001A
<i>Disclosure of Confidential Information to Vendors, Customers or Other Outside Entities</i>	01ADM-02-004
<i>Member Patents and Confidential Information Agreement</i>	01LEG-03-003
<i>Accounting Policies and Procedures</i>	01FIN-01-001A

Waivers

Consistent with New York Stock Exchange listing requirements, only the Board of Directors or a committee of the Board of Directors may waive a provision of this Integrity Manual for our executive officers or directors, and any waiver will be promptly disclosed to the public. Waivers of this Integrity Manual for any other member may be made only by an appropriate Company officer or business unit head, and then only under special circumstances.

Reporting Illegal or Unethical Behavior

In order to encourage good faith reports of illegal or unethical behavior (including violations of this Integrity Manual), we do not allow retaliation of any kind by the Company for reports of misconduct by others. It is also our duty to cooperate in internal investigations of alleged misconduct.

We must all work to ensure prompt and consistent action against unethical or illegal behavior. Often times a violation of this Integrity Manual will be easy to recognize and should be promptly reported to a supervisor or, if appropriate, a more senior manager. However, in some situations it is difficult to know right from wrong. Since none of us can anticipate every situation that will arise, it is important that we have a way to approach a new or sensitive question or concern. Here are some questions that can be asked:

Q WHAT DO I NEED TO KNOW?

A *In order to reach the right solutions, we must be as fully informed as possible.*

Q WHAT SPECIFICALLY AM I BEING ASKED TO DO? DOES IT SEEM UNETHICAL OR IMPROPER?

A *This will focus the inquiry on the specific action in question, and the available alternatives. Use judgment and common sense; if something seems unethical or improper, it probably is.*

Q WHAT IS MY RESPONSIBILITY?

A *In most situations, there is shared responsibility. Should colleagues be informed? It may help to get others involved and discuss the issue.*

Q HAVE I DISCUSSED THE ISSUE WITH A SUPERVISOR?

A *This is the basic guidance for all situations. In many cases, a supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is the supervisor's responsibility to help solve problems.*

Reporting Illegal or Unethical Behavior

Q

SHOULD I SEEK HELP FROM COMPANY MANAGEMENT?

A

In the case where it may not be appropriate to discuss an issue with a supervisor, or where you would not be comfortable approaching a supervisor with your question, discuss it with your Member and Community Relations representative. If for some reason you do not believe that your concerns have been appropriately addressed, you should seek advice from our General Counsel or from the MySafeWorkplace at 1-800-321-5378 or by email at www.mysafeworkplace.com, an anonymous and confidential reporting system. You should also use these procedures to make confidential, anonymous submissions of concerns regarding alleged violations of this Integrity Manual, including concerns with respect to questionable accounting or auditing matters.

INDEX

A		G	
Accounting policies & procedures	23	Guidelines	
Antitrust & trade regulations	8, 23	<i>fair competition</i>	8-11
B		<i>our community</i>	12-15
Behavior		<i>business integrity</i>	16-22
offensive or violent	12	H	
Business gifts and entertainment	16-17	Harassment	12
C		I	
Communication	5	Inside information & trading in	
Equipment	14-15, 23	securities	18-19
Company funds		violators	18
government official	6	Integrity	4-5
protection of	6, 21	Intellectual property	9-11, 23
political contribution of	6-7	Internal controls	20-21
Company property		K	
personal use of	14-15	Key Company policies	23
protecting	9-11, 15	L	
Company time	16	Letter from the Chairman	3
Competitive information	10-11, 23	M	
Confidentiality	9-11, 23	Meals & entertainment, business	6, 17
Conflicts of Interest		Member Safety Program	13, 23
personal favors & benefits	6, 16-17	Member Patents and Confidential	
personal relationships	16	Information Agreement	10, 23
Contributions		O	
political	6-7	Outside employment	16-17
Corporate opportunities	17	P	
Culture of integrity	4-5	Policies	
D		Company	23
Disclosure	5, 16, 23	Political activity	
Discrimination	12	Company	7, 23
E		personal	7
E-mail	9, 14-15	Pricing policy	8
Entertainment		Proper business practices	6, 23
offering & receiving	6, 17	Proprietary & confidential information	9-11
Environmental protection	13	benchmarking	10
environmental policy	13, 23	competitors	10-11
Equal employment	23	proper handling and marking	9
F		unsolicited ideas	9
Fair competition	8-11	Public Reporting	22
Fairness and respect	2, 3, 12, 23	R	
discrimination	12	Records	6, 20-21
harassment	12	Robinson-Patman Act	8
hostile work environment	12	S	
Favors		Safety	13
doing or receiving	6, 15	Member Safety Program	13, 23
G		Securities & Exchange Commission	18-19
Gifts		Security trades	18-19, 23
offering & receiving	6, 15-16	V	
Government agencies		Vision statement	2
doing business with	6, 23		
Guidelines			
customers, suppliers &			
government	6-7		