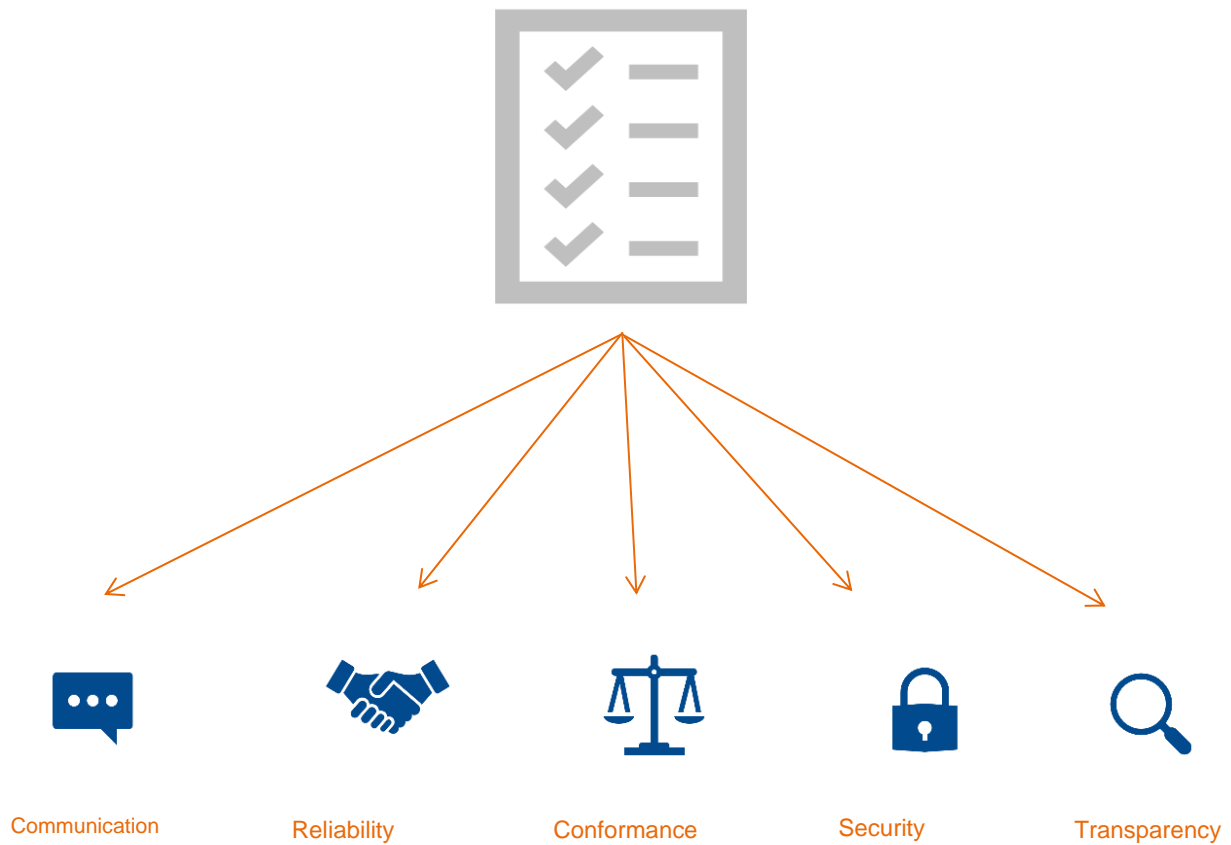


# Code of Conduct

**Version** 4  
**Confidentiality class** public



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## 1. Foreword by the Managing Directors

The ST Extruded Products Group (STEP-G) covers the entire production spectrum from cast billets and extruded profiles to ready-to-install components and parts and has established itself as one of the leading manufacturers not only as a partner for the automotive industry, but also as a responsible player in a global and ecological overall system. With the new joint management, we are resolutely moving in a future-oriented direction. Our aim is to make STEP-G sustainable and innovative in order to meet the challenges of the market and at the same time fulfil the needs of our customers.

In the more than 100 years since our foundation, we have continuously invested in modern production facilities, research and development and the training of our employees. This has not only made us strong in competition, but has also cemented the trust of our customers. Our focus on high standards characterises every decision we make and is the key to our long-term partnership.

Today's challenges are manifold: rapid technological developments, changing customer needs and an increasingly global market. It is therefore crucial for us to keep our processes lean, clearly structured and efficient. We need to offer innovative and sustainable product solutions in order to position ourselves excellently against the competition.

In order to achieve this, it is essential that we not only know the applicable legal requirements and internal rules, but also comply with them. The STEP-G Code of Conduct serves as a fundamental guideline for our actions. They provide us with orientation in everyday life and in critical situations so that we can make responsible decisions.

Use this set of rules as a guide for your daily actions. Ask questions if you are unsure and play an active role in ensuring that we take our social responsibility seriously. Together, as part of a strong team, we will ensure the sustainable success of STEP-G. Each of us is an important part of this process, and together we will master the challenges of the future.

Your Managing Directors



Faruk Tüfekli  
Managing Director



Stefan Knabben  
Managing Director

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## 2. Introduction

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The regulations in this Code of Conduct form the basis for our actions and contribute to our corporate success.

This Code of Conduct defines our key, basic rules and our principles for the direction of our business activities. It specifies the standards we observe, and also serves as a pledge to the outside world that we ensure responsible conduct towards business partners and that we also promote respect in the workplace within the STEP-G group<sup>1</sup>.

Our Code Ethics and Conduct supports correct, responsible action. At the same time, it is designed to proactively protect employees and prevent violations of applicable law and our own corporate guidelines.

This Code of Conduct was ratified in agreement with the employee representatives and is an expression of our active social partnership.

## 3. Our responsibility for compliance

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The success of our company depends crucially on all of us behaving ethically, honestly and with integrity.

All employees contribute to preventing irregular behaviour within the company. For this reason, we are all required to comply with the applicable laws, regulations, guidelines and standards in our daily business activities and measures. This enables us to prevent loss of sales and claims for damages and ensure the long-term success of our company.

In addition to this Code of Conduct, the company has drawn up guidelines on proper accounting, information systems, the authorisation of expenses/orders, the correct recording and proper presentation of business transactions in accounting and other documents, anti-corruption and the prevention of antitrust violations to support and guide us.

In addition, STEP-G ensures that internal controls are carried out as part of each employee's daily working hours and labour.

STEP-G does not accept any unlawful or inappropriate behaviour or behaviour that is contrary to this Code of Conduct.

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<sup>1</sup> The STEP-G group consists of the following companies: ST Deutschland GmbH and ST Extruded Products Germany GmbH

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STEP-G management is responsible for ensuring that adequate internal controls exist or are established and that these are implemented and reviewed as part of controls. These may be internal audits or audits as part of the annual financial statements.

Non-compliance with the Code of Conduct can lead to considerable damage, not only for our company, but also for us as employees and for our business partners.

To prevent this from happening, it is the responsibility of each and every one of us to familiarise ourselves with the content of the Code of Conduct, to incorporate it into our own behaviour, to take it into account when making decisions and to act accordingly.

## 4. Area of application

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All regulations stated in this Code of Conduct are<sup>2</sup> **binding** for all employees.

We ensure that the suppliers and business partners in our value-creation chain know our values and that they observe the principles and requirements in this Code of Conduct.

## 5. Our values and corporate culture

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We combine economic success with an open and respectful corporate culture. Our diversity - among employees, partners and customers - is the basis for our innovative strength and competitiveness. Respect and appreciation are at the centre of everything we do. They create a working environment in which we give each other honest and constructive feedback in order to continuously develop ourselves further.

We believe that employees who feel comfortable and can develop their skills are enthusiastic about delivering top performance. The focus is not just on individual success, but on the shared success of STEP-G. Through our sustainable profitability, we strive for constant, qualitative and quantitative growth that ensures high profitability. By combining economic success with responsibility, we secure our future and that of our partners.

Our values are reflected in the cornerstones of our name:

**Solution:** Innovation and foresight are the key to developing first-class solutions for our customers.

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<sup>2</sup> The term “employees” also covers managers at all levels, members of the executive management as well as interns and freelancers.

In this Code of Conduct, we only use the masculine form for natural persons, solely for reasons of readability. However, this always refers to persons of all gender identities.

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- Team:** Appreciation and motivation characterise cooperation - within the company and with our partners.
- Excellence:** We act competently, constantly improve and work in a target-orientated manner to ensure the highest quality.
- Partnership:** Our partnerships are reliable, fair and efficient. We work closely with proactively selected suppliers to ensure future-orientated, transparent and profitable cooperation.
- Global:** Our forward-looking approach means that we embrace diversity and embed sustainability in everything we do

## 6. Sustainability, social responsibility

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STEP-G is committed to the principle of social responsibility. We comply with the work standards of the various countries we operate in, ensure fair pay and working conditions and take account of our employees' private circumstances. We also insist on the highest possible respect in interactions with and between employees.

### 6.1 Human rights

STEP-G respects internationally recognised human rights and demands that its employees and suppliers comply with them.

STEP-G respects the human rights of particularly vulnerable groups, especially women, children, migrant workers or particularly vulnerable communities.

STEP-G does not tolerate any exploitation or contribution to slavery, servitude or human trafficking. No one should be employed or forced to work against their will. All forms of forced labour are prohibited.

Child labour is prohibited. STEP-G does not employ anyone who is not at least 15 years old.<sup>3</sup> STEP-G does not hire employees for risky work who are not at least 18 years of age.

STEP-G endeavours to avoid or mitigate negative impacts on human rights that could occur in connection with its business activities. This also applies in the event that STEP-G has neither contributed to nor caused such impacts.

### 6.2 Basic working conditions

STEP-G practices fair relations between management, staff and employee representatives and protects fundamental employee rights.

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<sup>3</sup> In countries classified under the developing country exception to ILO Convention 138, there is a possibility that the minimum age may be reduced to 14 years.

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#### a) Zero tolerance of discrimination and intimidation

The principles of equal opportunities and equal treatment are guaranteed regardless of race, skin colour, gender, religion, political opinion, age, nationality, sexual orientation, social or ethnic origin, physical and/or psychological limitations. STEP-G rejects any kind of discrimination; this also applies to the recruitment of employees.

STEP-G creates workplaces free from any kind of harassment. Harassment in the workplace includes insults, jokes, remarks or insinuations regarding an employee's age, race, skin colour, religion, origin or disability, as well as sexual harassment.

Inappropriate harassment by customers, suppliers or other business partners that occurs in contact with STEP-G employees is considered unlawful and will not be tolerated. STEP-G is committed to ensuring that all employees work in an environment free from harassment of any kind. Any form of behaviour that interferes with an employee's work performance or creates an intimidating, hostile, harassing or offensive work environment will not be tolerated and must be stopped and reported.

The use of security services is only permitted within the framework of legal requirements and may not exert any kind of coercion on employees, relatives or business partners.

#### b) Fair pay

STEP-G guarantees fair pay according to the statutory national minimum wage and applicable collective wage agreements. STEP-G is committed to the principal of equal pay for equal work, e.g. for men and women.

#### c) Working hours

Working hours, including overtime, are determined according to company requirements, taking account of the applicable maximum hours regulated by law or by collective bargaining agreements. Working hours are determined so that the employee's health is not affected and other aspects of social life are taken into account as far as possible.

#### d) Freedom of association and collective bargaining

Our employees are free to join trade unions and set up works councils. Employee representatives are protected against any form of unfair disadvantage. In their capacity as employee representatives, they have access to all workplaces where this is necessary for exercising their representative function. The company has a fundamentally positive attitude to trade union activities and an open-minded attitude towards their organisational activities.

STEP-G enables constructive cooperation between employees, employee representatives and trade unions.

#### e) Age-appropriate working conditions

The trend in European law towards later retirement ages also affects STEP-G. As early retirement usually results in financial losses for employees, it is likely that the actual age at which people retire will

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increase. STEP-G will as far as possible create the right framework for this new situation, including age-appropriate working conditions. Examples under consideration are altered shift systems, adapted workplaces for older employees, preventive health measures for stressful work, flexible conditions for the transition into retirement and protections for performance-impaired employees.

#### f) Work-life balance

As far as possible, STEP-G supports employees in achieving a balance between work and career on the one hand and family life, including looking after children or caring for relatives, on the other, taking into account the difficulties that may arise in the process. The focus here is on family-friendly working times as well as an awareness in our corporate culture of the needs of people with caring responsibilities.

### 6.3 Support for employee development

Our employees are among our key assets. Only motivated and qualified employees are able to perform at maximum efficiency and act in line with our corporate identity. This is why STEP-G is committed to filling its demand for qualified junior staff as far as possible through its own apprenticeship programme. We also invest in our employees by offering them further training that suits their profiles.

### 6.4 Leadership style

STEP-G is aware that a team-orientated and supportive management style is essential in order to take appropriate account of today's complexity and dynamics.

For this reason, managers at STEP-G are obliged to accept the challenge and create opportunities to initiate group processes, challenge and encourage employees, open up opportunities for them and allay any fears they may have.

### 6.5 Occupational health and safety

The top priority at STEP-G is the protection of the health and safety of every employee, visitor and contractor. Occupational health and safety measures are integrated in all work processes at STEP-G.

We are committed to providing safe, healthy working conditions, preventing work-related injuries and sickness and to consulting and involving employees and their representatives in our health and safety efforts. Furthermore, we have pledged to apply the following STOP principle to make our workplaces safer and healthier:

- (S)** Elimination of danger or substitution with less dangerous work processes, routines, material or equipment
- (T)** Application of technical solutions
- (O)** Adjustment of work organisation or application of administrative measures, including training
- (P)** Use of appropriate personal protective equipment

Every one of us has a duty to carry out our activities safely and carefully and report unsafe conditions

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to prevent accidents, injuries and illnesses.

STEP-G employees receive regular safety briefings in order to comply with occupational health and safety regulations in their working environments.

Constant analyses ensure safe plants, tools, processes and work routines.

The health and safety of employees in their free time is also important to STEP-G. Employees are regularly supported as part of action and support programmes. STEP-G offers additional services at its sites, such as health and safety days and other events as part of its health management programme. These measures offer the opportunity to strengthen and maintain employee performance and job satisfaction.

## 6.6 Environmental protection

We always give our best, not just in product manufacturing, but also in our efforts to protect the environment.

While ensuring our profitability, we also constantly strive to conserve resources and use them efficiently, as well as to avoid waste and emissions. Preventive inspections, maintenance and repairs prevent disruptions. We regularly review environmental aspects and update our protection measures accordingly. Our company is committed to the constant improvement of our eco-balance and to avoiding environmental impacts. We continually communicate and strengthen our respect for the environment as well as our responsible, eco-friendly activities.

The highest demands on sustainable production and sustainable solutions ensure maximum eco-efficiency at STEP-G for maximum eco-efficiency. An integrated management system determines our sustainable, energy-efficient and environmentally friendly activities at all levels.

STEP-G endeavours to avoid waste or to reuse it. STEP-G designs the processes in the manufacture of products and the operation of plants in such a way that the impact on the environment (air, water, soil) and climate is minimised.

Our solutions and technologies are the basis for sustainable technological development. The lightweight construction, recyclability and durability of our solutions are the prerequisites for a sustainable life cycle. The continuous improvement of our processes, machines and systems helps to protect resources and reduce greenhouse gases and noise pollution. The decentralised structure of the STEP-G Group ensures customer proximity and sustainable industrialisation.

## 6.7 Social support

With targeted actions such as material donations, STEP-G supports municipal projects and creates sustainable value for society.

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## 7. Risk-based management approach

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We set the highest standards in quality assurance to ensure that our products and processes meet the requirements of our customers and the applicable international standards. STEP-G is based on management systems in accordance with current international standards (e.g. EMAS, DIN ISO 9001/14001/45001, ISO TS 16949, IRIS, NADCAP, etc.). These systems promote continuous improvement in the areas of health and safety, environmental protection, sustainability and quality management. The objectives of the management system are regularly measured, evaluated, documented and communicated (also in dialogue with politicians, authorities, the public and social interest groups).

The ongoing integration of new quality requirements and findings into our guidelines is a central component of our corporate strategy in order to ensure that our high standards are sustainable in the long term.

## 8. Relations with customers, business partners, suppliers and competitors

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### 8.1 Basic principles

The requirements and wishes of our customers are at the centre of what we do. As a reliable partner for sustainable aluminium lightweight construction solutions, we focus on continuous improvement of our products and processes. At the same time, we attach great importance to the requirements of our customers and business partners in the production and manufacturing of our products and services. The safety, quality and reliability of our end products meet the highest standards. We also constantly work on reducing our carbon footprint.

In dealings with our business partners, our conduct is always fair and respectful. This helps to build long-lasting business relationships. We do not tolerate exaggerations, derogatory remarks, speculations or inappropriate descriptions of customers or business partners, including in internal communications. All our employees respect the rights of our customers and business partners.

### 8.2 Selection of business partners

We develop and maintain ethical and sustainable relationships with our suppliers and partners in the supply chain. We focus on achieving mutual benefit and on meeting or exceeding the requirements of our stakeholders. With this in mind, when selecting and working with our suppliers, we carefully consider their performance, commitment and continuous improvement. When selecting business partners, including suppliers, STEP-G always proceeds with care in order to protect customer interests. STEP-G places the same demands on its business partners and suppliers that it places on its own actions and expects them to comply with the relevant laws and the standards demanded by STEP-G. We actively monitor compliance. We actively monitor compliance.

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### 8.3 Fair and free competition

Antitrust law is intended to ensure the free organisation of the market economy and fair competition. Consumers should also be protected by not falling victim to agreements and arrangements that are negotiated to their disadvantage.

STEP-G is unreservedly committed to maintaining fair, honest and intensive competition. STEP-G is committed to this fundamental principle and undertakes to comply fully with the antitrust regulations of all legal systems in which it does business. STEP-G does not enter into any anti-competitive agreements with competitors, suppliers or customers.

No STEP-G employee participates in, orders, or authorises any conduct that violates the antitrust laws. All agreements between companies that limit competition are prohibited.

The “Guideline on Antitrust Regulations” provides detailed information and rules for STEP-G employees on antitrust regulations. It lists in particular the agreements between competitors that constitute antitrust violations and explains the correct conduct in dealings with competitors. STEP-G does not tolerate infringements of antitrust law.

If an employee suspects that a particular action could violate antitrust provisions, he must immediately inform the **Finance Department of STEP-G**.

### 8.4 Avoidance of conflicts of interest

STEP-G respects the personal interests and private lives of its employees. However, it is very important to STEP-G to avoid conflicts between private and business interests, as private interests must not influence business decisions.

For this reason, STEP-G employees always make day-to-day business decisions in the interests of the company and on the basis of objective criteria.

In the event that a conflict of interest arises, this must be disclosed to the line manager or management in order to find a solution with the relevant manager as quickly as possible.

### 8.5 Prohibition of corruption and bribery

STEP-G and all employees reject all forms of corruption and bribery. We do not offer or accept bribes.

STEP-G employees may only accept invitations, gifts, favours, personal discounts or other benefits from people or companies who are or could in future be in a business relationship with STEP-G if these benefits are proportionate and compliant with the valid regulations of our company.

Employees may neither request nor solicit gifts, invitations, favours or even personal services from business partners. Even if the mere suggestion of inappropriate influence could arise, benefits from business partners must be **refused**.

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## Accepting cash is always prohibited.

We also follow the above principles when it comes to gifts and invitations to our own business partners and customers. Even the mere suggestion of an attempt by STEP-G to gain inappropriate influence must be avoided at all costs.

STEP-G provides internal guidelines on dealing with gifts, hospitality and invitations. These define which benefits can be considered appropriate and what checks must be performed when accepting or awarding benefits.

### 8.6 Prohibition of money laundering and financing of terrorism

STEP-G only maintains business relationships with upstanding business partners, customers and suppliers whose business activities comply with statutory regulations and whose business and financial means have legitimate origins. For this reason, STEP-G carefully checks the identity of business partners, customers and suppliers.

All payments received by STEP-G are immediately allocated to the corresponding services and posted accordingly.

Employees who notice unusual financial transactions, also involving cash, which could give reasonable grounds to suspect money laundering must **immediately report this to the responsible Finance or Legal/Compliance department.**

## 9. Compliance with fiscal and customs regulations

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With regard to meeting our fiscal and customs obligations, we are aware of our social and legal responsibilities and are committed to compliance with national and international legislation.

## 10. Protection of our corporate values

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### 10.1 Protection of company property, trade secrets

All employees must protect the property of STEP-G from theft, loss, misuse and damage and must handle it carefully and responsibly. STEP-G property must not be used for conducting non-company business unless an agreement to the contrary has been reached with the company.

STEP-G owns numerous patents and other industrial property rights. The company also holds extensive trade and business secrets as well as technical know-how. These are among the most important company resources and ensure that STEP-G can operate competitively and effectively on the market.

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Therefore, intellectual property, business secrets, patents, trademarks and copyrights as well as business, marketing and service plans, engineering and production knowledge, designs, databases, drawings, salary information and all unpublished financial data and reports of STEP-G are valuable assets. They must be protected against theft, loss, misuse, damage and unauthorised access by third parties.

It is also important to prevent the unauthorised use of intellectual property by third parties.

## 10.2 Data privacy, confidential information, insider information

To prevent any risk of damage to the trust placed in STEP-G, it is essential to observe the valid data privacy regulations. STEP-G takes the protection of personal data very seriously, especially data relating to employees, customers, business partners and suppliers.

STEP-G collects and processes, uses and stores personal data confidentially and only for legitimate, previously determined purposes and in compliance with the statutory regulations.

All non-public information from and about STEP-G is defined as confidential information and trade or business secrets. Passwords which enable access to confidential information may on no account be passed on to third parties. The same applies to confidential information on customers, suppliers and business partners.

All employees bear responsibility for ensuring that both personal data and confidential information are protected against unauthorised access by third parties. They must not pass on such data and information to third parties or use it for purposes other than our company's purposes.

Insider information is precise information about circumstances which are not generally known to the market and which could, if it became known, significantly influence the price of the relevant shares. Therefore, insider information must also be kept confidential and protected from unauthorised access by third parties. Such information must not be passed on to outsiders.

Similarly, STEP-G does not tolerate the use or transfer of insider information for investment decisions.

Therefore, the security of this data and information must be ensured according to the applicable laws and internal directives and unauthorised access to it must be prevented by technical security measures. Company secrets as well as processes and activities in the company and secrets of customers, suppliers and business partners that are not publicly known must be treated confidentially and not disclosed to the outside world.

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## 11. Information security

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STEP-G uses an information security management system (ISMS) in line with the international standard ISO/IEC 27001:2013 to ensure the effective implementation of data security requirements. The system also takes statutory and contractual requirements into account. The ISMS applies the recommended continuous improvement process based on the PDCA model (Plan, Do, Check, Act). The aim of this is to verifiably and regularly ensure the appropriateness, completeness, sustainability, effectiveness and efficiency of the implemented information security processes and protection measures.

## 12. Responsible procurement

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With its responsible procurement approach, STEP-G focuses on sustainability aspects along the supply chain for the benefit of people and the environment.

STEP-G demands of itself and its suppliers that all products are free of conflict materials that are procured from sources that directly or indirectly finance conflicts or originate from mining activities in conflict or high-risk areas.

STEP-G is aware that conflict materials can be part of a supply chain.

In this context, we would like to emphasise that we strictly adhere to all legal principles, such as the EU Conflict Minerals Regulation and other applicable legislation relating to conflict minerals. STEP-G pursues an integrated risk-based management approach, which is based on the five steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA).

STEP-G expects its suppliers to fulfil their due diligence obligations to promote responsible raw material supply chains and to comply with all applicable legal regulations on conflict minerals. For example, minerals, in particular tin, tantalum, tungsten, gold and the corresponding ores and metals should be acquired without conflict.

## 13. Implementation and contacts

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Every STEP-G employee is obliged to take action to ensure compliance with the terms of this Code of Conduct.

STEP-G shall ensure that no employee is disadvantaged by adhering to our Code of Conduct.

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Violations of our Code of Conduct and/or breaches of the law may harm and damage the reputation or financial interests of STEP-G. This also applies in the case of suspected violations of terms of this Code of Conduct.

Whistleblowers can report possible misconduct and/or infringements via our [Whistleblower system](#) or using the [Contact form](#) of KBM Legal Bauer Sommer Partnerschaftsgesellschaft mbB. Reports are examined quickly and professionally. Whistleblowers can report anonymously and they enjoy special protection. Furthermore, any employee can contact the following instances in confidence to report violations and/or possible misconduct:

- Senior Management
- Manager
- Legal Counsel / Compliance Officer
- Works Council
- HSE

All information is treated confidentially in compliance with legal requirements. STEP-G processes reports of violations and takes appropriate measures if necessary. The central e-mail address [compliance\[at\]step-g.com](mailto:compliance[at]step-g.com) is also available to all employees and third parties (customers, suppliers) for questions relating to the Code of Conduct

ST Extruded Products Germany GmbH (STEP-G)  
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88267 Vogt  
Germany

E-mail: [compliance\[at\]step-g.com](mailto:compliance[at]step-g.com)

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