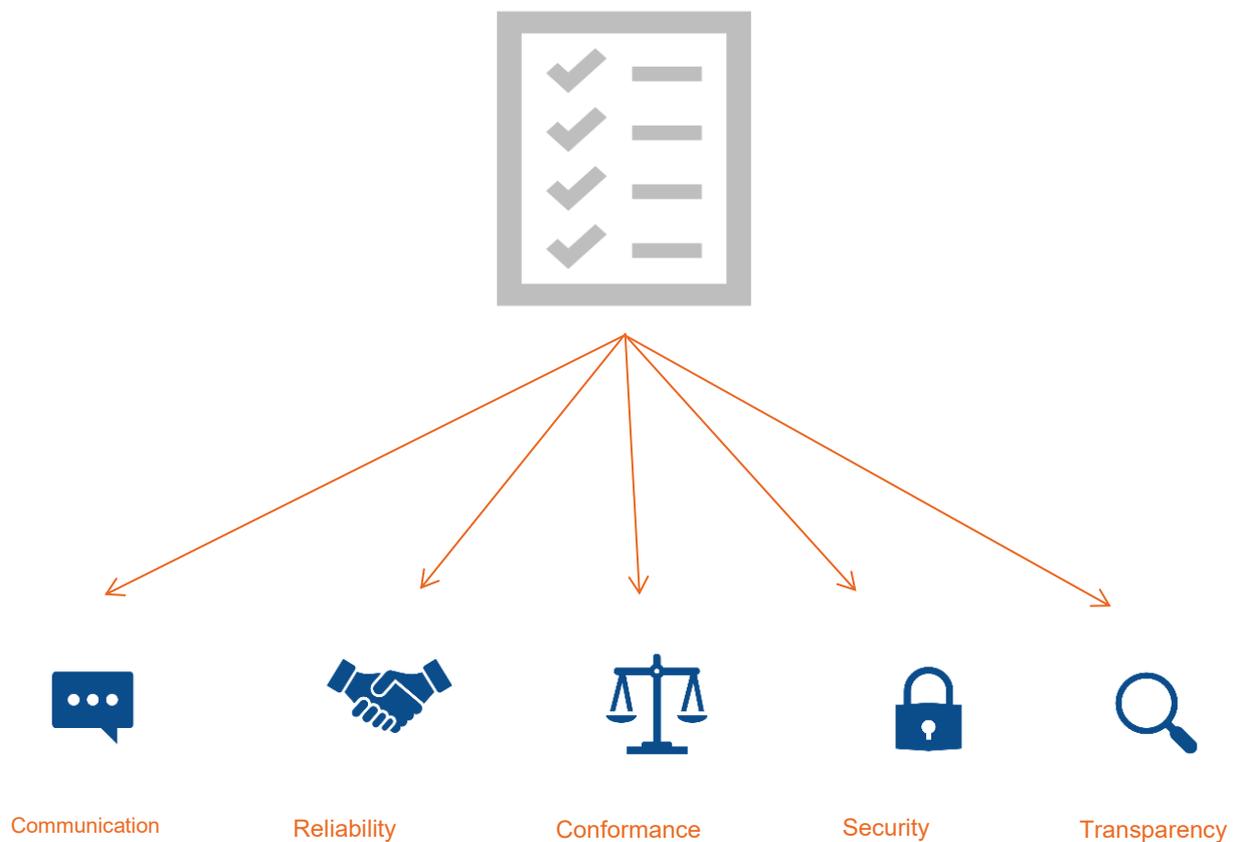


# Code of Conduct

**Version** 2  
**Confidentiality class** public



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## 1. Foreword by the Managing Directors

ST Extruded Products Group (STEP-G) is one of the world's leading producers of extruded aluminium profiles. As such it is part of both the global economic system and the overall ecological system. This means STEP-G bears responsibility. It is responsible in its daily activities for strict compliance with ethical, legal and its own corporate principles and for good conduct at all times.

More than 100 years since the foundation of its first German factory in Bitterfeld, STEP-G is now a global partner for companies in the automotive industry. Its corporate history shows that, due to continuous investment in state-of-the-art production plants, R&D, quality assurance and staff training, STEP-G has become a competitive player that faces up to the challenges of today's world.

In our everyday work and actions, in every production facility and office, we are dedicated to working responsibly and meeting our customers' requirements. This involves achieving a maximum of customer satisfaction and trust so that we can be a reliable, longstanding partner for our customers. We also carefully select responsible suppliers of materials and services and hold them to the same high standards as our own. In this way, we ensure optimal quality, delivery reliability and comprehensive service.

But what about today's specific challenges of constant change created by new technologies, competitors and customer requirements? Society has become far more diverse, and the economy even more global. Increasing demands on technology further raise the bar for our conduct as a responsible company. We need to constantly improve and optimise our value-creation chain and, wherever necessary, adapt our organisational structures.

This requires that all employees are familiar with and adhere to the applicable statutory regulations and our own internal rules. Our Code of Conduct provides the basis for our actions.

To keep up with current developments, we have updated our STEP-G Code of Conduct. The principles it contains give us all orientation in our daily work and in critical situations. They help us to make the right decisions.

Use this set of rules as a guideline in your daily conduct. If you are unsure about anything, please ask.

To maintain our success in the long term, we need to take both our social responsibility and our global responsibility seriously. It's down to each one of us to embrace these responsibilities because STEP-G can only sustain its successful trajectory in the future if we all pull together.

Your Managing Directors



Markus Ogawa  
Managing Director



Edgar Gebhart  
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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It is crucial for the success of our company that all company members abide by ethical standards and behave with integrity and honesty.

All employees are jointly responsible for preventing behaviour that violates the rules. That is why every one of us is obliged to observe the valid laws, directives, guidelines and standards in our daily business dealings. This helps prevent sales losses and compensation claims so that we can support the long-term success of our company.

Apart from this Code of Conduct, STEP-G has also created guidelines on correct accounting, the IT system, permissions, correct records and correct presentation in financial and other documents.

Furthermore, STEP-G carries out internal checks on the daily working time and performance of every employee.

STEP-G does not tolerate any criminal or inappropriate behaviour which contravenes this Code of Conduct.

The STEP-G management is responsible for ensuring that adequate internal controls exist or are created and that the controls are carried out and reviewed. These controls may be internal checks or audits for our annual financial statements.

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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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Failure to observe the Code of Conduct can cause 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

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

We stand for respectful, honest and rule-compliant conduct in daily business activities.

Reconciling human, environmental and profitability requirements is a top priority for us.

This is where we apply our values of openness, innovation, performance and continuity to achieve sustainable business operations.

### 5.1 Openness



Openness at STEP-G is about more than adhering to statutory regulations. One of STEP-G's strengths and a major success factor is our intercultural workforce. It's important to us that every employee actively contributes to our company to boost our development.

### 5.2 Innovation



The different experiences and perspectives of our employees provide a basis for innovation. Thanks to the innovative power of every individual at STEP-G, we understand our customers' needs.

### 5.3 Performance



The various competencies of each individual employee as well as their commitment to the company ensure STEP-G's high performance and ability to pursue a common goal.

<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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## 5.4 Continuity

We can rely on our employees and the self-discipline that drives each one of them to work towards our results and goals. This is a key factor that leads to continuity.

# 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 as well as suppliers comply with them.

STEP-G pays attention to respect for the human rights of especially vulnerable groups, in particular women, children, migrant workers or special vulnerable communities.

STEP-G neither tolerates exploitation nor contribution to slavery, servitude or human trafficking. Nobody shall be employed or forced to work against its will. Every kind of compulsory labour is inadmissible.

Child labour is generally prohibited.

STEP-G endeavors to avoid or mitigate negative impacts on human rights that occur in connection with its business activities.

This also applies in cases STEP-G has neither contributed to nor caused such effects.

STEP-G do not employ personnel who have not reached a minimum age of 15 years<sup>3</sup>.

## 6.2 Basic working conditions

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

### a) Zero tolerance of discrimination and intimidation

We guarantee compliance with the principles of equal opportunities and equal treatment regardless of race, skin colour, gender, religion, political opinion, age, nationality, sexual orientation, social or ethnic origin, physical and/or mental limitations. STEP-G rejects all forms of discrimination.

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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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STEP-G creates workplaces free of any kind of harassment. Harassment in the workplace is defined as insults, jokes about, remarks about or allusions to age, race, skin colour, religion, origin or disability of any employee as well as sexual harassment.

Harassment by customers, suppliers or other business partners who have contact with STEP-G employees is considered unlawful and will not be tolerated. STEP-G actively takes steps to ensure that all employees work in an environment free of any kind of harassment. Any form of conduct which negatively affects the work performance of an employee or creates an environment of bullying, harassment or disrespect will not be tolerated. Such behaviour must be discontinued and must be reported.

#### 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 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

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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. However, they can also be subject to the greatest level of fluctuation. 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 acutely aware that a team-oriented, supportive leadership style is essential to cope with the complexity and dynamic development of today's world.

Therefore, STEP-G managers are expected to embrace challenges, identify new possibilities and grasp opportunities. This could take the form of initiating group processes, challenging and also supporting employees, giving them new options and addressing 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 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.

STEP-G is also invested in the health and safety of employees in their free time. That's why we offer

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them regular support in the form of health campaigns and personal development programmes. At our locations, staff benefit from extras such as sports programmes, health days and other events as part of our health management system. These activities all help to maintain our employees' performance and work 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.

Top standards of sustainable production and solutions ensure maximum eco-efficiency at STEP-G. Our integrated management system complies with EMAS III Directive (EC) No. 1221/2009. This determines our sustainable, energy-efficient and eco-friendly operations at all levels.

STEP-G makes every effort to avoid or recycle waste. We design our processes for product manufacturing and plant operation to minimise their impacts on the environment and the climate as far as possible.

Solutions and technologies from STEP-G form the basis for sustainable technological development. Lightweight construction, recyclability and durable solutions are essential for sustainable life cycles. Continuous improvement of our processes, plants and machinery helps save resources and cut climate-harming gas emissions. STEP-G has a decentral organisational structure. This ensures regional supply of customers as well as sustainable industrialisation.

## 6.7 Social support

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

# 7. Corporate culture

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Health, safety, environmental protection and quality assurance are core considerations in our company. When developing new products and production processes, we take into account health, safety and

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environmental aspects as early as in the development and trial phases. We also grasp all opportunities to save energy and raw materials and to avoid, reduce or recycle harmful substances, noise emissions and waste. Furthermore, we use valuable resources appropriately and correctly dispose of waste which can no longer be utilised. On our own responsibility, we monitor and check plants and processes as well as air, water, soil, waste and noise.

Every employee at STEP-G has a duty to actively contribute to environmental protection. We provide information and training to promote eco-conscious behaviour in the company. All workplaces are designed to protect the health and safety of employees.

We ensure this by applying management systems that comply with common international standards (e.g. EMAS, DIN ISO 9001/14001, TS 16949, IRIS, NADCAP). These systems rely on continuous improvements in the areas of health and safety, environmental protection and quality management. We regularly measure, analyse, document and communicate the goals of our management system (also in dialogues with politicians, authorities, the public and other stakeholders).

A transparent corporate culture is part of our DNA. We carry out regular audits to ensure its effectiveness.

Our employees are our focus at STEP-G. Every employee contributes to a corporate culture characterised by respect and trust.

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

### 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

When selecting business partners, STEP-G makes sure they comply with the applicable laws.

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We always choose business partners, including suppliers, with great care in order to protect the interests of our customers. We hold our business partners and suppliers to the same high standards we have set for ourselves.

### 8.3 Fair and free competition

Antitrust legislation aims to guarantee the free functioning of the market economy and fair competition. It is also designed to protect consumers by preventing agreements between companies that could disadvantage them.

STEP-G is dedicated wholeheartedly to maintaining fair, honest and intensive competition. Our company is fully committed to this fundamental principle, and it is the policy of STEP-G to completely comply with the antitrust laws of all jurisdictions where we do 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 the private lives of its employees. However, it is vital to avoid conflicts between private and business interests. Private interests must never influence business decisions.

This is why, in daily business operations, STEP-G employees always make decisions in the interests of the company and on the basis of objective criteria.

If a conflict of interest occurs, this must be disclosed to the employee’s supervisor or the management. It is then imperative that the employee works with the responsible manager to find a solution as quickly as possible that does not adversely affect the interests of STEP-G.

### 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.

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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**.

### **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**

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.

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## 10. Protection of our corporate values

### 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.

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.

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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.

## 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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We demand of ourselves and our suppliers that all products are free of conflict materials procured from sources that directly or indirectly finance conflicts in the Democratic Republic of the Congo or the surrounding countries, or which come from mining activities in conflict-affected or high-risk areas.

STEP-G is aware that conflict materials can be part of a supply chain. STEP-G strives to ensure the responsible procurement of these minerals by implementing the OECD guideline “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”.

STEP-G expects its suppliers to exercise due diligence for responsible raw material supply chains and to comply with all applicable statutory regulations regarding conflict minerals. In this way, we aim to procure minerals, especially tin, tantalum, tungsten, gold and the corresponding ores and metals from conflict-free sources.

## 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.

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.

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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 reports are handled in strict confidence. STEP-G processes reports of violations and takes corresponding measures if necessary.

Furthermore, if any employees or indeed third parties (customers, suppliers) have any questions about our Code of Conduct, they can submit their questions using our central e-mail address [compliance@step-g.com](mailto:compliance@step-g.com).

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