

Code of Conduct and Ethics

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1. Foreword of the Executive Management

As a multinational company and thus as a part of the complete global economic and ecological system, the ST Extruded Products Group (STEP-G) has a responsibility which – in everyday trading alone – obliges us to act properly in accordance with ethical, legal and other internal specifications as well as with professional conduct in every situation.

In our everyday activities, it is important to us to satisfy customer requirements with all of their specifications. For this reason, it is necessary to achieve the highest level of customer satisfaction, to gain the trust of our customers and thus to become a reliable and long-term partner for our customers. In order to fulfil these demands, we also expect our suppliers and service providers to guarantee the optimum level of quality, delivery reliability and extensive services along the supply chain to us. The continuous improvement and optimisation of our value-added chain and – where necessary – the adjustment of organisational structures are the foundations for this.

With its values of openness, innovation, performance and continuity, STEP-G is fully committed to sustainable economic activity. However, it is our employees in particular who are able to achieve this through their work. The correct conduct of each and every one of our employees who act as permanent ambassadors for the company, both internally and in public, shapes the nature of our everyday activities. This applies both to contacting customers, business partners, suppliers, competitors and bearers of public duties and to dealing with their own colleagues.

This code of conduct and ethics sums up the most important specifications. The code applies to all employees and to contractors who work for or on behalf of STEP-G. The code defines the fundamental principles for STEP-G to ensure that our business activities comply with the law.

We are fully committed to acting respectably, honourably and in conformity with the rules in our daily business activities and stand by the following principles of conduct and ethics.

Vogt, June 2016

2. Preamble

The aim of the code of conduct is to support the company management and employees (any male forms used here and throughout the code also include the female form) of the STEP group in complying with legal requirements and internal company specifications in the context of their work.

This code forms the foundation of the nature of all activities and represents an essential basis for the success of the company.

The code was adopted in coordination with employee representatives and is the expression of the existing social partnership.

The code serves the purpose of protecting employees and should ensure that violations of applicable law and internal company specifications can be avoided from the outset.

The employees of STEP-G are trained and qualified in line with these guidelines. Their sense of responsibility towards as well as their indirect influence on these guidelines will be communicated to the employees on an on-going basis.

3. General principles of conduct

3.1 Law-abidance and responsibility

STEP-G and its employees are obliged to comply with applicable laws, regulations, guidelines and standards in all activities and measures. Working in such a manner, sales losses and compensation claims can be avoided and the long-term success of our company can be guaranteed. Regardless of whether STEP-G gains an advantage or not, it is completely in the interests of STEP-G and its employees to conduct themselves in a lawful, responsible and honourable manner.

All of our employees are encouraged to familiarise themselves with the applicable laws and guidelines. The company management in particular must get to grips with the basic laws, specifications and internal company regulations for their sphere of responsibility.

To support and monitor compliance with laws and regulations, the company has put together guidelines on proper accounting, on information systems, on authorisation, on correct recording and on proper representation of finances as well as other documents. STEP-G is thus ensuring that internal control processes can be performed in the framework of the daily working time and labour of each employee. STEP-G is taking the attitude that no employee should be able to get around these guidelines or to ignore internal control processes.

The STEP-G management is responsible for ensuring that adequate internal control processes exist or that these are created and that these are performed and also examined in the framework of monitoring procedures. These can be internal examinations or examinations conducted for the annual financial statement.

3.2 Health and safety at work

Protecting the health and safety of each and every employee, visitor and contractor and protecting the environment are the top priorities at STEP-G. As such, every individual is required to carry out his work in a safe manner in order to avoid accidents, injuries and illnesses. STEP-G has set itself the aim of designing its workplaces in such a way that they are absolutely safe and healthy. Any kind of environmental pollution is to be avoided. Continuous analyses, safety inspections and environmental protection inspections guarantee safe systems, tools, procedures and working processes.

3.3 Corporate culture

Health, safety, environmental protection and quality assurance are of central importance at our company. In the development, manufacturing and processing of our products, we pay particular attention to fully meeting the requirements of our customers and working within the framework set out by the contract. The safety of our employees and the quality of our products are never neglected in the process.

The fundamental basis of our corporate culture is formed by management systems in line with common international standards (e.g. EMAS, DIN ISO 9001/14001, TS 16949, IRIS, NADCAP etc.). These systems focus on continuous improvements in the fields of health and safety, environmental protection and quality management. The goals of the management system are regularly measured, evaluated, documented and communicated (also in dialogue with politicians, authorities, the public as well as societal shareholders).

A transparent corporate culture is a matter of course for STEP-G. We monitor the effectiveness of such systems in regular audits. Each and every one of our employees works to promote a corporate culture which is shaped by respect and trust.

3.4 Anti-discrimination, harassment in the workplace

STEP-G is committed to equal opportunities and equal treatment regardless of sex, age, disability, ethnic origin, world outlook, religion, nationality or sexual orientation. No form of discrimination or harassment will be tolerated.

STEP-G offers jobs free from all forms of harassment. Harassment in the workplace includes insults, jokes, remarks or innuendos regarding the age, race, skin colour, religion, origin or disability of an employee as well as sexual harassment. Such conduct against our corporate culture of non-discrimination will be considered an unlawful act. Both men and women can be victims of sexual harassment.

Inappropriate harassment by customers, suppliers or other business partners who are in contact with STEP-G employees will be considered unlawful and will not be tolerated. We want to make sure that all employees are able to work in an environment free from all forms of harassment. Any form of conduct that has a negative impact on the working performance of an employee or which gives rise to an intimidating, hostile, harassing or insulting working environment will not be accepted and must be completely stopped or reported. All forms of employee harassment will not be tolerated.

4. Avoidance of conflicts of interest and corruption

4.1 Dealing with STEP-G property

The material and intellectual property of STEP-G must be handled properly and carefully and must be protected against loss or damage. In principle, STEP-G property may only be used for business purposes unless the company guidelines or works agreements permit private use.

4.2 Conflicts of interest

In daily business activities, all employees, executive employees and the company management of STEP-G always make decisions in the interest of the company. If, for whatever reason, there is a conflict of interest and private and family interests would have an impact on the decision, this conflict of interest must be communicated to a superior or to the Executive Management so that they may take the necessary measures to resolve the situation as quickly as possible.

4.3 Fighting against corruption and bribery

STEP-G and its employees show zero tolerance of any form of corruption, bribery and corruptibility.

Invitations, gifts, favours, personal discounts and other benefits offered by people or companies, which currently have or could have a business relationship with STEP-G in the future, may only be accepted by employees of STEP-G if they are proportionate and are in accordance with the applicable guidelines of our company. The same applies for the granting of such benefits to current and future business partners or customers of STEP-G by our employees.

4.4 Protection of company property

All employees must protect the property of STEP-G against theft, loss or damage and handle it carefully and responsibly. The property of STEP-G may not be used for non-business purposes – unless otherwise stated in another works agreement.

Intellectual property and trade secrets, patents, trademarks and copyrights as well as business, marketing and service plans, engineering and production expertise, blueprints, databases, accounting records, salary information and all unpublished financial data and reports must be protected in the same way as material things.

5. Business conduct

5.1 Taxation, international trade

STEP-G respects and complies with all applicable tax laws in all of the countries in which the company is active. The company also abides by all import and export regulations.

5.2 Data protection and confidentiality

The data of employees, customers and business partners, which is collected in daily business activities, must be collected, processed, stored and disseminated in line with internal company guidelines and legal provisions.

In order to not jeopardise the trust placed in STEP-G, it is absolutely essential to comply with the applicable data protection regulations. The security of commercial data must therefore be secured in line with the applicable guidelines and unauthorised access to personal or commercial data must be prevented by means of appropriate technical protection.

Trade secrets as well as company processes and activities which are not public information must be handled confidentially and must not be disclosed to the outside world.

5.3 Insider information

Confidential information, to which employees of STEP-G have access, must not be forwarded to third parties or used for purposes other than business purposes. All non-public information of and about STEP-G is to be considered as confidential information. Passwords which allow access to confidential information must also be forwarded under no circumstances.

The forwarding or use of insider information for investment decisions is unethical and unlawful.

5.4 Fair competition

STEP-G abides by legal provisions in order to guarantee fair competition. With regards to competition, our employees and the company management are obliged to stand up to competitors in an honourable and fair manner. Price fixing, territorial allocations amongst competitors, unauthorised use of copyrighted data, spying on protected trade secrets and other unlawful and unethical business practices are thus forbidden. We would much prefer that our highest quality standards and outstanding services and processes give us an edge over our competitors.

5.5 Customers and business partners

STEP-G places great importance on the requirements and wishes of the customer. The requirements of the customer are always taken into consideration during production and manufacturing. The safety, quality and reliability of the end product meet the highest standards.

We always conduct ourselves in a fair and cooperative manner towards business partners to ensure that we can develop a long-term business relationship where possible.

Exaggerations, snide remarks, rumours or inappropriate descriptions of customers or business partners are forbidden – even in internal communications.

All employees and the company management observe the rights of our customers and business partners.

6. Man and the environment

6.1 Social responsibility

Internationally recognised human rights are supported and respected by STEP-G. Child and forced labour is strictly forbidden. There is a trustful relationship and mutual respect between the company and employees – something which is good all for parties.

6.2 Environmental protection

Whilst taking economic aspects into consideration, we are constantly striving to save and use resources efficiently as well as to avoid waste and emissions. Hazardous incidents are avoided thanks to preventative inspections, maintenance and repairs. The environmental aspects and the resulting measures are regularly examined and updated. We are committed to continuously improving our environmental performance. We provide all of the necessary resources (staff, time, finances) as well as relevant information required for this.

Respect for the environment as well as acting in an independent and environmentally-conscious manner are communicated and reinforced on an on-going basis.

7. Compliance with the code

All employees and the company management of STEP-G are obliged to do their very best to ensure compliance with this code. Violation of this code and/or violations of the law by an employee can permanently damage the reputation of our company. In the case of violations, we must thus react quickly and appropriately. STEP-G guarantees that the code is not to the detriment of employees and carefully examines comments regarding violations.

In the case of questions about the code of conduct and ethics or to report a violation, the first point of contact for every employee is their supervisor.