

Supplier Code of Conduct

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1. Preamble

ST Extruded Products Group (STEP-G) ¹ supports the fundamental principles of human rights, ensures compliance with labour and environmental protection standards, and also seeks to maintain high ethical and moral business standards.

These standards also play a significant role in the business relationships between STEP-G and its suppliers and are set out in this Supplier Code of Conduct.

STEP-G shall ensure that its “suppliers” (including their bodies, employees, representatives, subcontractors and distributors) comply with all applicable domestic and foreign legal provisions and avoid any actions that could lead to STEP-G or any of its affiliated companies violating applicable law or being penalised under applicable law.

STEP-G also expects its suppliers to comply with the following standards.

STEP-G expressly reserves the right to monitor the extent to which this Supplier Code of Conduct is complied with. Such monitoring can be carried out by obtaining a self-disclosure from the supplier, information from third parties, requesting submission of certificates and permission to monitor compliance with this Supplier Code of Conduct through on-site audits at the supplier’s premises.

2. Purpose

This Supplier Code of Conduct defines the principles and requirements of STEP-G and its affiliated companies pursuant to sections 15 ff. AktG (German Stock Corporation Act) pertaining to suppliers with regard to social responsibility and environmental protection.

The supplier agrees to the following requirements and principles.

This Supplier Code of Conduct is part of all contracts between STEP-G and its suppliers. If a supplier fails to comply with a standard of this Supplier Code of Conduct, STEP-G expects the supplier to take corrective action and inform STEP-G accordingly.

3. Compliance with the law

Suppliers shall comply with the laws and legal provisions of the respective applicable jurisdictions.

¹ STEP-G Group as referred to here consists of the following companies: ST Deutschland GmbH, ST Extruded Products Germany GmbH, Sankyo Tateyama Europe BV, BUG Aluminium-Systeme

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4. Human rights and labour practices

Suppliers shall ensure that internationally applicable human rights are respected. In this connection, particular attention must be paid to respecting the human rights of vulnerable groups, especially women, children, migrant workers or particularly vulnerable communities.

4.1 Prohibition of forced and child labour

Suppliers shall not exploit or contribute to slavery, servitude, forced or compulsory labour or human trafficking.

They shall not employ workers who are under the minimum age of 15 years. In countries that fall under the developing country exception of ILO Convention No. 138, the minimum age may be reduced to 14 years.

Suppliers shall not hire workers for hazardous work who are under the minimum age of 18 years in accordance with ILO Convention No. 182.

4.2 Equal treatment and respect for employees

Suppliers shall ensure equal opportunities and equal treatment of employees regardless of skin colour, race, sexual orientation, nationality, social origin, political affiliation, any disability, gender or age.

They shall ensure respectful treatment of employees and strictly refrain from cruelty (whether physical or psychological), sexual harassment and any behaviour detrimental to the employee.

4.3 Health and safety of employees

Suppliers shall ensure that working conditions comply with legal and international standards in terms of health and safety. Compliance with working conditions shall be ensured through health and safety management.

Employees shall be sensitised to the topics of health and occupational safety through training.

4.4 Working hours, remuneration and fringe benefits for employees

Suppliers shall ensure that the applicable provisions on working hours are complied with worldwide.

Appropriate remuneration shall be paid and all the applicable provisions regarding pay and remuneration shall be complied with worldwide.

Suppliers shall recognise the right of employees to form and join existing trade unions and to engage in collective bargaining.

Suppliers shall neither disadvantage nor favour employees in trade unions or workers' organisations.

In the event of cross-border deployment of staff takes place, suppliers shall ensure that all the applicable legal provisions, in particular with regard to minimum wages, are complied with.

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4.5 Ethical Recruitment

STEP-G expects its contractors to recruit employees regardless of race, skin color, gender, religion, political opinion, sexual orientation, physical or mental limitations and social or ethnic origin.

5. Environmental protection

Suppliers shall ensure that they promote safe and environmentally friendly development and manufacture of products, as well as their transport, disposal and use.

Suppliers shall ensure that they use resources efficiently, that they use energy-efficient and environmentally friendly technologies and promote a reduction in waste and in emissions to air, water and soil.

It is expected that a high priority will be placed on reuse and recyclability during product manufacturing.

Measures shall be taken to ensure continuous improvement of all company processes to contribute to the achievement of climate goals. A focus must be placed on the use of sustainable energy sources. Monitoring of greenhouse gas emissions must be established and the evidence must be presented upon request.

Suppliers are expected to protect natural ecosystems from deforestation, forest or Protect land conversion. Suppliers make every effort to conduct their business activities without deforestation (“Net Zero Deforestation”). It is expected that the supplier will not have a negative impact on local and global biodiversity and will also take animal welfare concerns into account.

The supplier may not deprive land, forests or waters, the use of which secures the livelihood of people, in violation of legitimate rights. He must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for food production or prevents people's access to safe drinking water or sanitary facilities.

Environmental protection aspects shall be monitored and complied with by setting up an appropriate environmental management system.

6. Sustainable chemicals management

We expect our suppliers to handle/use chemicals in an environmentally compatible and sustainable manner.

Of course, the same also applies to waste materials, so that negative effects on human health and the environment are kept to a minimum.

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Furthermore, we require that the use of chemicals is reduced to a process technology minimum and that the choice of use is made from a sustainable point of view.

Any waste produced must be disposed of in accordance with the legal conditions. In addition to the provision of personal protective equipment, the employees concerned are also to be provided with the necessary occupational health care.

7. Responsible procurement of materials

Suppliers shall ensure that no products are supplied that contain conflict materials, directly or indirectly finance or support armed groups and cause human rights violations as described in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The creation and use of plagiarism in any form is prohibited; the supplier assures that no plagiarism is used and prevent us from counterfeit parts through an outgoing goods inspection. If plagiarism is discovered, it must be permanently marked as not usable and separated immediately.

8. Fair operating practices

8.1 Anti-corruption and bribery

Suppliers shall not tolerate any form of corruption or bribery and shall not participate directly or indirectly in any such activities.

8.2 Conflicts of Interest

Suppliers shall ensure that conflicts of interest that could influence the business relationship are avoided and/or that any such conflicts are disclosed.

8.3 Fair competition, antitrust and intellectual property rights

Action shall be taken in accordance with national and international competition laws.

Any participation in price fixing, sharing of markets or customers, market collusion or bid rigging is prohibited.

Intellectual property rights of others shall be respected. The supplier handles business correspondence with confidence. Confidential information, any type of data worthy of protection and the intellectual property rights of STEP-G are properly secured in accordance with the respective legal requirements. The supplier will only use the data provided by STEP-G within the scope of the business relationship if STEP-G has not given permission for other purposes. The supplier will ensure the confidential and careful handling of sensitive data.

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8.4 Money laundering and terrorist financing

Suppliers shall ensure that they do not directly or indirectly promote money laundering and terrorist financing.

8.5 Data protection and information security

Personal data and company data shall be treated confidentially and responsibly in accordance with the data protection regulations applying in the respective countries and in compliance with state-of-the-art technical and organisational measures.

The privacy of all individuals shall be respected and the confidentiality, availability and integrity of information shall be ensured.

Suppliers shall ensure that personal data is effectively protected and only used for legitimate purposes. Disclosure to third parties shall only take place after release by the client.

8.6 Export control and customs

Suppliers shall ensure that the applicable export control and customs regulations are complied with.

9. Supply chain

Appropriate measures shall be taken to ensure that suppliers comply with the basic principles of this STEP-G Supplier Code of Conduct.

When selecting new suppliers and dealing with existing suppliers, measures shall be taken to ensure compliance with the principles of labour practices and human rights.

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10. Agreement to the STEP-G Supplier Code of Conduct

As a supplier to STEP-G, we act in accordance with the principles laid down in this Supplier Code of Conduct. We also pass these requirements on to our supply chain.

We hereby recognise the STEP-G Supplier Code of Conduct or confirm that we comply with the above principles and requirements set down in the STEP-G Supplier Code of Conduct by applying our own, equivalent code of conduct in our company.

[SUPPLIER]

Place, date

Signature and stamp of supplier or digital signature/recognition

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11. Revision tracking

Version	Date	Author	Changes
01	02-2022	Margot Godau	Document created
02	03-2022	Margot Godau	Addition to point 7.5: Information security
03	03-2022	Margot Godau	Addition regulations regarding sustainable chemicals management, point 6.
04	08-2024	Jens Heinrich	Addition to points 4.5, 6, 7, 8
05	08-2024	Mike Vervoort	Addition in Preamble and point 7

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