

Detail Group Code of Ethics

1. APPLICABILITY

This Code of Ethics applies to all employees of the Detail Group and the entire supply chain. Detail Group requires that its suppliers and their subcontractors commit to adhering to this Code as a condition of doing business. Suppliers must comply with all applicable laws, regulations, rules, and Detail Group policies in the countries and territories where they operate. Suppliers are expected to familiarize themselves with the business practices of their own suppliers and subcontractors and hold them accountable for compliance with this Code. Detail Group reserves the right to terminate business relationships with suppliers who fail to comply.

2. ECONOMIC, ETHICAL, AND SUPPLY CHAIN SUSTAINABILITY

- Compliance with all applicable export control laws, economic sanctions, and trade restrictions at both national and international levels, particularly avoiding transactions with sanctioned entities and embargoed countries, as defined by relevant authorities. Suppliers must provide proof of country of origin and compliance with free trade agreements.

- Zero tolerance for corruption, bribery, illicit commissions, and similar improper payments.

- Avoidance of conflicts of interest.

- Transparent and lawful relationships with customers and business partners; rejection of unethical business practices.

- Compliance with fair competition laws and transparent market behaviour.

- Adherence to all applicable antitrust and anti-cartel regulations.

- Protection of intellectual property rights.

- Rejection of counterfeit products and materials.

- Financial accountability and legal responsibility of company directors, including fulfilment of financial targets, customer and bank contracts, and business insurance.

- Protection of customer confidential information, intellectual property, trademarks, and copyrighted materials.

- Compliance with applicable Detail Group policies and reduction of operational risks related to this Code.

- Maintenance of a system for continuous improvement and adaptation to changing laws and regulations.

- Transparent supply chains documented and subject to verification through audits.

- Communication of this Code throughout the company and supply chain.

3. SOCIAL RESPONSIBILITY, HEALTH, AND SAFETY

- Communication with relevant stakeholders.

- Strict compliance with human rights principles.

- Non-discrimination: employees are hired, employed, and promoted based on qualifications and abilities.

- Zero tolerance for child labour (under 15 years), forced labour, and modern slavery.

- No overtime, night shifts, or harmful work conditions for workers under 18.

- Right to freedom of association and collective bargaining in line with applicable laws.

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- Prohibition of withholding workers' identification documents to force labour.
- Safe, healthy, and ergonomically organized workplaces in compliance with labour standards.
- No recruitment fees charged to workers.
- Ethical recruitment practices ensuring fairness, transparency, and protection of personal data.
- Prohibition of labour agencies that fail to comply with local labour laws.

- Inclusive, diverse, and equitable workplaces without discrimination based on age, race, colour, nationality, ethnicity, sexual orientation, gender identity, religion, maternity, family status, genetics, disability, union membership, veteran status, or other protected characteristics.

- Maintenance of an inclusive environment where women are respected, supported, and protected from discrimination and harassment, with fair opportunities for career development.

- Promotion of equal opportunity and work environments that enable everyone to reach their potential.

- Respect and dignity for all workers, with strict prohibition of physical punishment, harassment, and abuse.

- Protection of employee privacy and personal data processing in compliance with regulations.
- Mandatory conflict minerals reporting for Detail Group and its suppliers.
- Support for diverse sourcing, including small and disadvantaged businesses.
- Whistleblower mechanisms allowing anonymous reporting without fear of retaliation.

- Compliance with wage, working hour, and overtime regulations to maintain humane and productive conditions.

- Respect for the rights of individuals and communities to own, manage, and use natural resources, including land, forests, and water, in accordance with national and international laws. No tolerance for forced evictions or rights violations.

- Use of public or private security forces strictly in accordance with legal, ethical, and human rights standards.

4. ENVIRONMENTAL RESPONSIBILITY

- Sustainable operations minimizing environmental impact and protecting resources, customers, and employees.

- Commitment to ISO 14001 certification.

- Reduction of greenhouse gas (GHG) emissions aligned with sustainability goals and international climate agreements, including measurement, evaluation, and reporting.

- Environmental policy responsibility at all organizational levels, from management to operations.

- Compliance with all applicable environmental laws concerning soil protection, air emissions, water discharge, hazardous substances, packaging, and waste disposal.

- Compliance with RoHS, REACH, and other environmental protection regulations.

- Continuous improvement of energy efficiency in operations (Energy Efficiency Policy), including energy consumption optimization and monitoring.

- Use and promotion of renewable energy sources (Renewable Energy Policy).

- Waste reduction initiatives (Waste Reduction Policy) across all business stages.

- Promotion of material reuse, waste segregation, and third-party managed recycling (Reuse and Recycling Policy).

- Reduction of noise emissions impacting local communities and worker health.

5. **REPORTING VIOLATIONS**

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Anonymity is guaranteed for all employees who wish to report violations of this Code or other company policies, including:

- Bribery and corruption
- Human rights violations
- Child labour and modern slavery
- Activities endangering health and safety
- Damage to property
- Unfair competition practices
- Abuse of security forces
- Violations of environmental laws

Reports can be submitted through the following link:

https://forms.office.com/Pages/ResponsePage.aspx?id=zd7U4x87v0OTQ6xPOFPeJ65zzS04FDNFgk55 zlEyBM1UMkpNOTgyQUIWN09MWTdVRVdZVTU3V01TNy4u

All reports will be reviewed by the HR department within 60 days. If contact details are provided, confirmation and results will be sent to the reporting party. Anonymous reports will be recorded and processed without direct feedback.

Reports are managed according to registry F212: Registry of Ethics Violations. An attachment to this Code is document F233, 'The Ten Commandments of Detail Group Employees.'

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Revision

- 09-02-2021, First edition, L. Bednář
- 02-03-2023, Code revision according to JD, change of document name to current version, separation of the Employee Decalogue into a separate appendix, L. Bednář
- 28-04-2023, Code revision according to Scania Supplier Code of Conduct Version 1: 20180301, addition of the social area, L. Dibelková
- 19-06-2024, Revision of Social area, health and safety prohibition of misuse of any security forces
- 01-01-2025, Revision of Social area, health and safety, freedom of association, collective bargaining, inclusive, diverse and equitable environment, right to resources and rejection of forced eviction, declaration of ergonomic workplace, update on misuse of security forces, L. Bednář
- 01-01-2025, Revision of Economic area, ethics and supply sustainability, declaration
 of transparent and fair competition, declaration of antitrust and anti-monopoly
 policy, export control and economic sanctions, ethical recruitment and maintaining
 an inclusive environment, L. Bednář
- 01-01-2025, Revision of Environmental area, GHG, energy efficiency, renewable resources, waste reduction, reuse and recycling, noise emission reduction, L. Bednář
- 01-01-2025, First paragraph of the code, document binding nature, L. Bednář
- 08-05-2025, Document revision, L. Bednář

Document Distribution

- Document collection, controlled documentation, shared drive
- Website Detail-cz.cz
- Website Detail-cz.cz, English translation
- Internal bulletin board Detail CZ, 1st floor, offices
- Internal bulletin board Detail CZ, production entrance hallway
- Internal bulletin board Detail Plus, entrance hall

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