



**DCS**

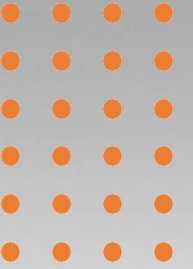
DIGITAL CUSTOMS SERVICES

**COP**

**COMMUNICATION ON PROGRESS**



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I am pleased to confirm that DCS Digital Customs Services Inc. of Istanbul TURKEY, reaffirms its support of the ten principles of the Global Compact with respect to human rights, labor, environment and anti-corruption.

The Company's inherent value system and principled approach to conducting business in an ethical manner reflects its commitment to corporate sustainability, and pledge to adopt good practices and deliver on its fundamental responsibilities in areas of human rights, labor, environment and anti-corruption.

We believe that the pursuit of excellence also means shaping a more sustainable future for the world and we have the responsibility to align our activity with this ambitious goal.

For this purpose, our Code of Ethics sets out our highest commitments to human rights, labor standards, the environment and the fight against corruption.

We constantly work to integrate these commitments into our activities, with the aim of adding value both within DCS and for all external stakeholders. DCS's business strategies, policies and procedures collectively establish a culture of integrity and set the basis for ensuring long term success whilst upholding its basic responsibilities to people and planet.

In 2021 we continued to increase our efforts in terms of sustainability, both internally for key functions and processes and externally in our services and projects. Our twin goals are to minimize the impacts of our operations and support customers by generating positive impacts for their business.

In this annual Communication on Progress we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share the information with our stakeholders using our primary channels of communication.



Dr. Kenan Güler  
DCS Digital Customs Services Inc.  
Chairman and CEO



# ABOUT DCS

DCS Digital Customs Services Inc., formerly known as Guler Dinamik Customs Consultancy Inc. was established at the beginning of 2010 after a merger of two customs consultancy companies. Although both direct and indirect representation is possible in Turkey, because of the complexity of customs procedures more than 95% of importers opt to use indirect representation and have their transactions handled by customs consultancy firms. In indirect representation, a customs consultant is liable before the law for the transactions equally with the company on whose behalf he/she acts.

As a result, customs consultancy companies need to be very careful to avoid penalties and charges. Consultancy companies need to be very careful about the integrity of the data that clients provide. Even minor mistakes can turn into complex customs issues, resulting in heavy penalties for the importing company and its customs representative.

In 2020, the company was rebranded as “Digital Customs Services” to reflect their fully digitalized and integrated business model.

Having a strong set of values that respect people, society, and the planet has always been at the heart of DCS as those reflect the values of the founders and the board of directors. Being aware of the compliance risk management priorities of their clients and the company values they needed to protect, DCS has established a robust and multi-façade compliance program for the management of their integrity and sustainability risk. The company is among the first ones to be ISO37001 certified in Turkey.

Following are the memberships, affiliations and certifications that DCS holds:

- UN Global Compact, signatory
- B20 Integrity and Compliance Taskforce, member
- B20 Digital Transformation Taskforce, member
- Ethics and Reputation Society of Turkey, member
- Turkish Customs Brokers’ Ethics Declaration, signatory
- Ecovadis certified (Silver)
- ISO 37001 certified





# ABOUT DCS

DCS, adopting the principles for sustainability of the behavior as well as sustainability of the services and solutions;

Signatory of United Nations Global Compact, Member of Turkish Ethics and Reputation Society (TEID) and Signatory of “Membership Declaration of TEID”; Member of Istanbul Customs Brokers Association (IGMD) and Signatory of Customs Brokers Declaration of Ethics;

The compliance approach and the anti-corruption risk management program of DCS has been awarded as industry best practice in the regional anti-corruption report of OECD in 2016 and 2021.

DCS has adopted the standards of “Integrated Management Systems” in order to maintain the provided services in accordance with the International Quality Management Systems conditions.

- ISO 9001 Quality Management System Certificate
- ISO 14001 Environmental Management System Certificate
- ISO 27001 Information Security Management System Certificate
- ISO 45001 Occupational Health & Safety Certificate
- ISO 37001 Anti-Corruption Management System Certificate



# ABOUT THE COMPLIANCE PROGRAM

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## Business Rationale Behind the DCS Compliance Program

As per the essence of their extended enterprise risk management approach and their global compliance programs, corporations are in the position of anticipating and managing exposures associated with third parties across the organization's full range of operations as well as optimizing the value delivered by the third-party ecosystem. DCS serves many such global brands like Amazon, Adidas, Atlas-Copco, DB Schenker, Schneider and Honeywell and has been developing and shaping a compliance program to address the integrity risk management priorities of those global clients operating under a wide spectrum of anti-corruption regulations. DCS perceive their compliance program not only as a robust risk management tool but also as a competitive edge in serving their global clients.

In short... compliance is in the hearth of DCS's business model. DCS is

evolving and growing rapidly.

We therefore have a constant need to look at sustainable solutions and take a structured approach in the conduct of our business. This allows us to develop and deliver new services that have a positive impact on society as well as the environment.

We are committed to embed sustainability as one of the key drivers of our business strategy and to ensure this approach is reflected in the services we deliver to our clients.

We actively support the 10 Principles of the UN Global Compact relating to human rights, labor standards, the environment and the fight against corruption. We report and communicate annually to our stakeholders on progress made to implement these principles.





# ABOUT THE COMPLIANCE PROGRAM

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Our path towards sustainability involves several internal initiatives designed to increase awareness of more sustainable ways to approach our business and carry out our activities, as well as to develop innovative services that generate positive impacts for our stakeholders and for our customers' projects and businesses.

We have enhanced our approach to integrity, through our ethical culture of doing business, formalized in four pillars:

## **Governance | People | Planet | Innovation**

We want our stakeholders to feel confident that we do our best to manage our social, environmental and economic impacts. We maintain a proactive and transparent dialogue with our stakeholders to better understand their expectations and build shared values.

The integrated Enterprise Risk Management (ERM) framework that we have adopted considers strategic, financial, operational and compliance risks as well as environmental, social and governance (ESG) criteria. The aim is to drive continuous improvement in each of these areas.

DCS is engaged in rule development processes within several technical associations, committees and working groups, at both the national and international level, with the purpose of sharing research, results, technical knowledge and best practices.

At the nucleus of our corporate integrity programme is...

# RESPECT



# ABOUT THE COMPLIANCE PROGRAM

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## **We respect our corporate culture by:**

- integrating sustainability into our business activities
- creating long-term value
- increasing returns for investors and shareholders
- ensuring the highest level of integrity
- fighting against any form of fraud and corruption
- following fair and correct business practices
- following international best practices

## **We respect our people by:**

- respecting human rights in our organization and supply chain
- respecting labor organization principles
- meeting health and safety regulations
- creating a safe, participatory and inclusive workplace
- banning any discrimination in respect of employment and occupation
- considering diversity as an opportunity and meritocracy as a must

## **We respect our planet by:**

- meeting environmental protection regulations
- increasing energy efficiency
- reducing CO<sup>2</sup> emissions
- minimizing and mitigating any environmental impacts
- creating value in local communities
- sharing social values with our stakeholders







# ABOUT THE COMPLIANCE PROGRAM

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## Support and Oversight of the Management

While business ethics is the common culture of doing business for everybody in DCS, compliance management is a top-down system. Thus, the CMS is established and maintained through the Board of Directors' oversight, which ensures the regulatory process is fully functional within their organization.

An effective Compliance program prevents enforcement actions, such as penalties and litigation. It also manages regulatory risks and ensures that threats are identified and mitigated. Although, at a glance, this sounds very straightforward for most business, for a customs broker, it is an extremely complex process—often filled with overlapping regulatory bodies and seemingly endless requirements. DCS's Compliance program was structured using top-down leadership and proactive oversight to avoid pitfalls and streamline the compliance process for the organization.

Implementing and sustaining an effective compliance program are chief oversight responsibilities for the Board of Directors at DCS.

DCS Board oversight includes:

- To identify compliance expectations for the institution and impacted clients, vendors and providers,
- To develop organizational statements that unequivocally convey compliance requirements,
- To select and appoint a compliance officer and to understand the duties of the officer,
- To ensure the compliance officer can conduct his or her tasks with proper authority and accountability,
- To appropriate the financial resources toward compliance functions based upon the organization's requirements,
- To require and to review compliance audits,
- To provide a system to receive regular reports from the compliance officer,
- To apply or approve corrective measures to both corporate and regulatory integrity risks and to provide follow-up to ensure these are satisfactorily completed.



# ABOUT THE COMPLIANCE PROGRAM

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## Tone at the Top, Tune at the Middle

No matter how effective the leadership is in reinforcing the company's commitment to business ethics, it is essential that middle managers are responsible for promoting ethical behavior.

Furthermore, the responsibility of the middle managers is not limited to being good examples, but they also constitute a line of defense as they are the ones whom a misconduct is reported or a concern is raised to within DCS.

In DCS, upper and middle management work together to create an environment that champions communication, "a workplace where employees feel comfortable expressing concerns and ideas". DCS has launched a new business concept called "The Sherpa Program" where they identify themselves as Sherpas serving DCS and their clients to safely reach their goals while the related compliance and operational risks are being minimized by the professionalism and knowledge of the crew. The backbone of this program is the coaching and reverse coaching where message about DCS's Compliance priorities are being communicated and echoes received from the crew are carefully noted for further development of the integrity risk management program of the company. Below are some of the actions taken to strengthen and to motivate the middle management:

- Communicating regularly about compliance with ethical goals, the value of those goals, and specific expectations.
- Leading by example and often speaking about remaining compliant.
- Listening; asking managers and employees directly about their challenges with compliance and welcoming their opinions, suggestions, or concerns.
- Being open about how ethical values and compliance influence management decisions.
- Encouraging questions when ethical action is unclear.
- Providing consistent and general guidance regarding how ethical values apply to dilemmas.
- Compliance is also one of the main KPIs of the middle management and it is incorporated in the middle management performance review.





# ABOUT THE COMPLIANCE PROGRAM

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## Bringing Compliance to Life at all Levels of Employment

When it comes to compliance communication in DCS, no group of internal stakeholders are left out. DCS HR department plays a critical role in company's compliance communication efforts. Every new employee must be trained in the organization's policies, existing employees must remain aware of those same policies, trainees have their own version of business ethics and code of conduct trainings.

The company has developed a specialized program for the trainees "the Young Sherpas" where all trainees go through a series of business ethics courses and get paired with their supervisors for their on-the-job trainings. The Young Sherpas organize weekly assessment meetings where they find the chance to openly discuss the mismatches or the gaps they had encountered between the business principles they were thought and real-life business practices of their supervisors.



# ABOUT THE COMPLIANCE PROGRAM

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## Risk-Based Compliance Trainings

DCS has established in 2020, an online interactive compliance academy where all their personnel and the key personnel of their subcontractors go through compliance trainings designed based on the risks those parties manage. DCS works in the intersection of multiple regulations and jurisdictions.

As an example, a DCS employee must be aware of the general definitions of corruption and bribery according to Turkish Penal Code, FCPA, UKBA or SAPIN 2 depending on the client they serve or the function they fulfill. All DCS employees go through an inclusive anti-corruption training every year and should they be appointed to a client from US, UK or France, they take additional courses informing them about the regulatory requirements of those jurisdictions and the corruption risks they manage on behalf of their foreign clients.





# ABOUT THE COMPLIANCE PROGRAM

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## Risk Management in the Field Operation

Customs brokerage can be easily split into two main lines of service:

Office works, where customs brokers, legal experts and client representatives complete the paperwork for customs clearance and issue the import or export declarations

Field work, where DCS crew handles the physical customs operations at the gates, in the customs offices, in front of the customs agents.

The latter function is where the misconduct risk is prone to occur the most. DCS has been applying rigorous internal controls on this function to prevent voluntary misconduct. However, from time to time a simple delay in the operation may create a state of mind where the field operator may be inclined to give a small gift or make a facilitating payment due to the performance pressure he or she may be feeling under. To eliminate such pressure, DCS has established a system where, once a file reaches the hands of a field operator, no client or client representative may reach him to create additional pressure.

All such files are being digitally tracked by the “control tower” where the field operation is being tested against operational KPI’s and should there be a need to intervene, only the seasoned customs inspectors working in the control tower contact with the field operator to supervise and to resolve the problem causing the delay.





# ABOUT THE COMPLIANCE PROGRAM

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## Innovation, Digitalization and Digital Integration

48 engineers in the DCS software development team tirelessly work in perfecting the digital infrastructure of the company and to create a paperless working environment and to minimize human errors and misconducts, albeit voluntary or not.

Thanks to the software and tools developed by the same group, DCS works fully integrated with their world leader clients like Amazon and make the relevant and secured data from their systems to towards the client's. Although this may seem to be an operational issue, mind due that customs operation is a highly regulated one and any mistake made by the broker may reflect as a fine or a compliance issue to the client. Therefore, minimizing the human touch and maximizing the safe flow of coherent data to the client is another level of compliance control in DCS business

Being highly aware of the importance of data security, DCS develops all their software "Blockchain ready".





# ABOUT THE COMPLIANCE PROGRAM

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## Robust Third-Party Integrity Risk Management Program

In the highly globalized business environment of the 21st century, the business ecosystem of any company includes business partners, vendors, distributors, agents, suppliers and affiliates. Although their third parties are not as wide as an industrial company, DCS is not exempt from the risks of working with suppliers.

As per the essence of its extended enterprise risk management approach and its compliance program, DCS anticipates and manages exposures associated with third parties across the organization's full range of operations as well as optimizing the value delivered by the third-party ecosystem.

The third-party integrity risk management approach of DCS has the following areas and priorities:

- A risk assessment process to identify, segment, mitigate, and monitor risks and risk factors
- Due diligence that is proportionate to the risk
- A comprehensive workflow system
- A company-wide approach to risk management



# ABOUT THE COMPLIANCE PROGRAM

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## Compliance Program Performance Evaluation Methodology

One of the most important output of the Sherpa Program is the coherent data on which comprehensive compliance performance and progress reports are produced. DCS compliance office not only prepares a performance report for the board to evaluate and perform their oversight duties but also, together with the legal and operations departments they prepare a performance report for the client where they share their insights and development suggestions for the client to perfect their cross-border trade operations and minimize the fines they face.

DCS board and the department heads convene once every year to evaluate the performance of the DCS Compliance Program, set new targets for the following year, discuss how their compliance performance may help the company retain the current clients and increase their client base. This full weekend compliance retreat is where new standards are being discussed and crucial decisions are being taken like which clients to continue working with and which clients to let go. Reputation and compliance risk management priorities of DCS has an equal say in deciding which clients to let go as the operations and financial priorities.





# ABOUT THIS REPORT

This report reflects our self-assessment on how we work to continuously meet the UN Global Compact Active Level criterion.

It includes some of our initiatives to ensure a sustainable business-oriented approach.

DCS is committed to communicating on an annual basis its advancements and developments towards the goals' realization. The report is publicly available on the DCS website:

[www.dcscustoms.com.tr](http://www.dcscustoms.com.tr)

DCS welcomes questions, comments and feedback from all its stakeholders. Please contact us

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The 17 Sustainable Development Goals (SDGs) define global sustainable development priorities and aspirations for 2030 and seek to mobilize global efforts around a common set of goals and targets. The SDGs call for worldwide action among governments, business and civil society to end poverty and create a life of dignity and opportunity for all, within the boundaries of the planet.

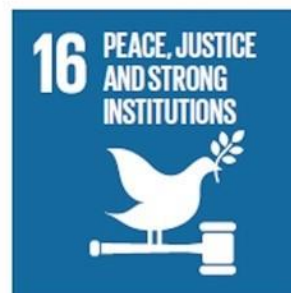
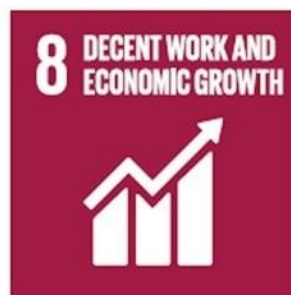
This report reflects our continued journey towards integrating sustainable business practices into the heart of our strategy and operations. It does so by delivering a transparent account of our management of and performance towards the material, environmental, social and governance issues of our company.

This commitment is rooted in our desire to earn the long-term trust of our stakeholders and to make substantial contributions to global sustainable development.

This report meets the requirement of the United Nations Global Compact Active Communication on Progress (COP) and relates to the year 2021.



# SUSTAINABLE DEVELOPMENT GOALS







# THE UNGC 10 PRINCIPLES

## HUMAN RIGHTS

Businesses should support and **RESPECT THE PROTECTION** of internationally pro- claimed human rights; and make sure that **THEY ARE NOT COMPLICIT** in human rights abuses.

## LABOUR

Businesses should uphold the freedom of association and the effective recognition of the right to **COLLECTIVE BARGAINING**; the elimination of all forms of **FORCED AND COMPULSORY LABOUR**; the effective abolition of **CHILD LABOUR**; and the **ELIMINATION OF DISCRIMINATION** in respect of employment and occupation.

## ENVIRONMENT

Businesses should support **A PRECAUTIONARY APPROACH** to environmental challenges; undertake initiatives to promote **GREATER ENVIRONMENTAL RESPONSIBILITY**; and encourage the development and diffusion of **ENVIRONMENTALLY FRIENDLY TECHNOLOGIES**.

## ANTI-CORRUPTION

Businesses should work **AGAINST CORRUPTION** in all its forms, including extortion and bribery.





# OUR COMMITMENT

## Human Rights Principles

**Principle 1:** Business should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** Make sure that they are not complicit in human rights abuse

### Policy & Goals

DCS actively supports the Universal Declaration of Human Rights. We do not engage in business with any countries or organizations where human rights fail to be respected and unacceptable methods are used e.g. exploitation, torture, politically motivated disappearances, slavery and child labour.

Our Directors ensure we protect the human rights of our employees through establishing and implementing various policies that support our company values.

DCS has an Ethical Employment Policy which provides a working environment that protects the rights of all employees and individuals. The Policy is designed to encourage, value and manage diversity and to ensure everyone is treated with respect and dignity.

DCS is committed to promoting and valuing diversity in all areas of recruitment, employment, training and promotion. It strives to maintain an environment that is based on merit and inclusiveness. It guards against all forms of discrimination and harassment and is committed to ensuring all employees can develop their full potential, irrespective of race, gender, marital status, sexual orientation, disability, age, political opinion, religion, and belief, ethnic or national origin.

DCS has a Combatting with Bullying and Harassment Policy and is committed to ensuring that all employees are treated fairly and with respect. DCS forbids all forms of harassment in the course of employment including that committed by third parties and seeks to ensure that the working environment is comfortable for all its employees.





# OUR COMMITMENT

## Human Rights Principles (cont)

**Principle 1:** Business should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** Make sure that they are not complicit in human rights abuse

### Implementation

DCS has a Human Recourse Policy which reflect our pro-active state on human rights. Staff consultations are conducted where organisational changes are being implemented to ensure staff are informed and have an opportunity to influence outcomes. DCS's Ethics Code covers policies concerning our employee rights which are founded on sound business practice and legislative requirements.

Every effort is made to ensure that our third parties re to comply with the Universal Declaration of Human Rights. We evaluate all partners and suppliers against a set of defined principles, policies and guidelines.

### Measurement

All policies are reviewed for suitability, sustainability and effectiveness on an annual basis or sooner should a significant change occur. These reviews are formally recorded.

DCS has never been subject to any investigation, legal cases or incidents involving Human Rights violations.



# OUR COMMITMENT

## Labour Principles

- Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: The elimination of all forms of forced and compulsory labour;
- Principle 5: The effective abolition of child labour; and,
- Principle 6: The elimination of discrimination in respect of employment and occupation

### Policy & Goals

It is DCS's policy to provide employment, training, promotion, pay, benefits and other conditions of employment without regard to race, gender, marital status, sexual orientation, age, political opinion, religion, belief, ethnic or national origin or disability unrelated to an individual's ability to perform essential job functions. It is also the company's policy to confirm to all employment standards by law.

DCS affirms with its "Fight with Child and Forced Labor Policy" its support of the International Labour Organisation (ILO) Core Conventions and will not do business with any organization that uses forced or child labour, and within its own business promotes opportunities for people of all genders to obtain decent and productive work, in conditions of freedom, equity, security and dignity.

All DCS employees are issued with a contract of employment which clearly states their terms and conditions including pay rates, holidays and sickness entitlement. All employees are issued with a Company Handbook which includes information on standard terms and conditions of employment, company benefits, company rules, grievance and disciplinary procedures.

DCS also has a robust induction program which introduces employees into the ethos of the company, including its commitment to Corporate Social Responsibility and the importance of the 10 Principles of the UN Global Compact. In addition, DCS provides detailed guidelines on Health and Safety items such as risk assessments, identified hazards and the procedures in place to reduce or eliminate risks.





# OUR COMMITMENT

## Labour Principles (cont)

- Principle 3:** Business should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4:** The elimination of all forms of forced and compulsory labour;
- Principle 5:** The effective abolition of child labour; and,
- Principle 6:** The elimination of discrimination in respect of employment and occupation

### Implementation

DCS is ISO9001 – Quality Management and ISO37001 certified and has a wide range of policies supporting best practice in terms of labour and employment including; Equality and Diversity Policy, Performance Appraisal Policy and Whistleblowing Policy, Code of Ethics, Ethical Employment Policy.

To enable seamless integration of new and emerging standards across the business DCS has developed an Integrated Management System which incorporates all policies, processes and procedures required to support key compliance requirements including ISO9001 and other ISO standards, best practice guidelines and other industry requisites.

Formal meetings regarding all compliance and Health and Safety matters are held bi-annually to review current policies and discuss any issues or concerns. The meetings are formally recorded, and the minutes are available for all to read.

### Measurement

DCS consults with staff on a regular basis through: annual reviews where staff are encouraged to define their own objectives and goals, through annual internal staff suggestion surveys where feedback is gathered about various aspects of the business including HR Policies, and through annual company updates where the CEO and executive team members provide an update on the past business year, achievement made and business projection for the following year.

DCS has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Company Labour principle. DCS has not been subject to any health and safety statutory notices or prosecutions.



# OUR COMMITMENT

## Environmental Principles

- Principle 7:** Business should support a precautionary approach to environmental changes;
- Principle 8:** Undertake initiatives to promote greater environmental responsibility; and Encourage the development and diffusion of environmentally friendly technologies.
- Principle 9:**

### Policy & Goals

DCS is ISO14001 – Environmental Management accredited and has a wide range of policies supporting best practice in terms of environmental management and minimising any adverse environmental impact.

DCS promotes the use of environmentally sound resources, discourages wasteful and damaging practices and continues with initiatives to promote greater environmental responsibilities through implementation of a detailed and comprehensive Environmental Policy.

Being mostly office based, the nature of DCS's business makes our environmental impacts relatively small however we are keen to ensure continued commitment to internal policies and controls.





# OUR COMMITMENT

## Environmental Principles (cont)

- Principle 7:** Business should support a precautionary approach to environmental changes;
- Principle 8:** Undertake initiatives to promote greater environmental responsibility; and Encourage the development and diffusion of environmentally friendly technologies.
- Principle 9:**

### Implementation

In context of our Environmental, Legal and Communication Aspects Policy, environmental aspect and impacts along with company environmental objectives, targets have been documented which are reviewed and audited annually with results reported at the Integrated Management Meetings.

Climate Control – DCS Technology has identified the responsibilities relating to the provision and use of energy services and we encourage all employees to take reasonable measures to conserve energy.

Energy efficiency measures include: automatic controls of heating; automatic light switches; good housekeeping measures such as switching off PCs and other office equipment.

### Measurement

In the last year DCS achieved their target of reducing fuel consumption by 5%. This was achieved by using technologies available to use like conference calling, tele and video-conferencing and the ability for individuals to work from home. DCS has also offset its carbon footprint consumption by 10% by replenishing the environment, planting trees in a memorial garden for neo-natal babies.

DCS has never had a reportable environmental incident, and would not expect to, given the nature of our operations. We have never been subject to any statutory notices or prosecutions.



# OUR COMMITMENT

## Anti\*Corruption Principles

**Principle 10: Business should work against corruption in all its forms, including extortion and bribery**

### **Policy & Goals**

DCS is ISO 37001 certified and it is DCS's policy to conduct all of our business in an honest and ethical manner. The company takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery. DCS supports the UN Convention.

DCS will uphold all laws relevant to countering bribery and corruption and is compliant with the Bribery Act 2010.





# OUR COMMITMENT

## Anti\*Corruption Principles

### Principle 10: Business should work against corruption in all its forms, including extortion and bribery

#### Implementation

DCS's Anti-Corruption and Bribery Policy sets out clearly exactly what could be considered bribery in terms of business operation including receiving gifts and hospitality with the CCO (Chief Compliance Officer) being ultimately responsible for anti-corruption within the company.

All employees are subject to a robust induction process which covers the Company's Anti- Corruption and Bribery Policy, and all employees who are required are subject to formal Disclosures & Barring Service checks during their probation and then at regular intervals to ensure the integrity of their background and suitability for employment.

Through ISO27001 internal and external audits, the Data Protection Policy is regularly reviewed with all staff being trained annually on the requirement to protect personal data.

DCS ensures that monetary values are checked under the responsibility of the CCO with a prior check by the Finance Director.

DCS will continue to audit our suppliers to ensure they are ethically trading and not involved in any unethical practices.

#### Measurement

All DCS employees go through rigorous checks on induction including proof of citizenship and DBS checks where required which reduces our exposure to risk of corruption.

Audited accounts are verified by external auditors each year and submitted to Companies House. DCS has not been involved in any legal cases, rulings or other events related to bribery and corruption..

# Contact Us

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