

ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

DCS



Anti-Discrimination and Anti-Harassment Policy

1 Purpose

The purpose of the DCS Anti-Discrimination and Anti-Harassment Policy is to provide all employees with a work environment where they are treated with dignity, respect, and fairness. DCS is committed to providing a workplace free from discrimination, harassment, and mobbing, where each individual has the opportunity to contribute fully to the company's success.

2 Scope

This policy applies to all DCS employees, contractors, applicants, and other individuals associated with DCS, regardless of employment status. It covers all aspects of employment, including recruitment, promotion, training, compensation, and other terms and conditions of employment.

3 Definitions

Discrimination: Any unfair or unequal treatment of an individual or group based on characteristics such as race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, marital status, veteran status, or other characteristics protected by applicable laws.

Harassment: Unwelcome conduct based on a protected characteristic that creates a hostile, intimidating, or offensive working environment. This includes, but is not limited to, verbal, physical, or visual behavior that belittles an individual or expresses hostility or hatred toward them.

Sexual Harassment: A specific type of harassment involving unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, where submission to or rejection of such conduct affects an individual's employment, unreasonably interferes with work performance, or creates an intimidating, hostile, or offensive work environment.

Mobbing: Malicious, intentional, and negative attitudes and bullying behavior in the workplace carried out by one or more individuals against another over a period of time in a systematic manner. It aims to demoralize, isolate, discourage from work, or push the target away from their job. It harms the victim's dignity, professional status, social relationships, or health.

4 Policy Statements

4.1 Non-Discrimination

DCS is an equal opportunity employer. Employment decisions are based on merit, qualifications, and business needs. Discrimination against any employee or applicant on the basis of protected characteristics such as race, color, language, ethnicity, national origin, religion, political opinion, gender, sexual orientation, gender identity, disability, veteran status, age, marital status, pregnancy, or maternity status is strictly prohibited.

All employees have the right to work in an environment free from discrimination and respectful of human rights. DCS will not tolerate discrimination of any kind in the workplace.

The principles adopted by DCS to ensure a workplace respectful of human rights are detailed in the Human Rights Policy.

4.2 Anti-Harassment

DCS is committed to providing a workplace free from harassment, including sexual harassment. No form of harassment will be tolerated.

Harassment may manifest as offensive jokes, insults, name-calling, physical assaults or threats, intimidation, ridicule, humiliation, offensive or disturbing objects or visuals, and interference with job performance.

Examples of conduct that may be considered harassment include, but are not limited to:

Verbal harassment: spreading rumors, making ugly or disturbing jokes, name-calling, swearing, physical harassment—invading personal space, unwanted physical contact, etc.

Sexual harassment: whistling, making sexual comments or innuendos, commenting on someone's body or clothing, persistent sexual or romantic advances, unwanted sexually explicit communications (such as emails or photos)

Psychological harassment: deliberately excluding someone, belittling or humiliating them, consistently opposing a particular person, intimidating, gaslighting (causing someone to question their reality and mental health), mobbing, micromanagement.

Persistent stalking behaviors such as tracking, monitoring, or spying on a person in physical or digital environments, or insistently and disturbingly contacting them, also qualify as harassment under this policy. All forms of harassment are prohibited.

Any employee who believes they have been subjected to harassment or who witnesses harassment should immediately report it to their manager, the Human Resources and Support Services Directorate, and/or the Ethics and Compliance Function.

4.3 Sexual Harassment

Sexual harassment in the workplace is illegal at DCS and strictly prohibited. This includes quid pro quo harassment, where submission to sexual advances is tied to employment decisions, as well as hostile work environment harassment where the behavior creates an intimidating or offensive workplace.

Examples of sexual harassment include, but are not limited to, unwanted sexual advances, inappropriate touching, sexually suggestive or obscene comments, displaying sexually explicit materials, and offensive jokes or remarks about someone's gender or sexual orientation.

4.4 Mobbing

DCS prohibits all forms of mobbing among employees regardless of their seniority or position. For a behavior to be considered mobbing, it must:

- Occur in the workplace
- Be carried out systematically
- Be repeated with persistent frequency
- Be intentional
- Aim to intimidate, neutralize, or remove the person from their job
- Harm the victim's personality, professional status, or health

Mobbing can be practiced by superiors against subordinates, subordinates against superiors, or among peers.

Negative attitudes and behaviors toward a person may be either overt or covert.

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Responsibilities

5.1 Employees

- Treat all colleagues, clients, and partners with respect and refrain from any discriminatory or harassing behavior
- To report any incident of discrimination, harassment, or retaliation to the Ethics and Compliance Function.
- Fully cooperate in any investigations related to discrimination or harassment complaints

5.2 Managers

- Ensure employees understand and comply with this policy
- Take immediate and appropriate action upon becoming aware of any discrimination or harassment
- Support employees in reporting concerns and ensure that reports are taken seriously and addressed promptly

5.3 Human Resources and Support Services Directorate and Ethics and Compliance Function

- Provide training and resources to employees and management on preventing workplace discrimination and harassment
- Conduct comprehensive and impartial investigations into all reported cases of discrimination, harassment, and mobbing
- Ensure implementation of corrective actions and monitor their effectiveness.

6 | Monitoring and Compliance

DCS will regularly monitor the workplace to ensure compliance with this policy and to prevent discrimination and harassment.

Any violations of this policy will be addressed promptly, and corrective measures will be taken as necessary.

Evaluation of this policy is part of regular compliance reporting.

7 | Policy Violation

Violation of this policy, including cases of discrimination, harassment, or mobbing, may result in various disciplinary actions up to and including termination of employment or contract.

DCS may also take legal action against individuals engaging in unlawful discrimination or harassment.

8 | Reporting and Whistleblower Protection

Employees are encouraged to report any incident of discrimination or harassment as soon as it occurs. Reports can be made to a manager or submitted directly to the Human Resources and Support Services Directorate and/or the Ethics and Compliance Function.

DCS provides mechanisms for employees, suppliers, and other stakeholders to report concerns about violations of this policy confidentially and without fear of retaliation. Employees should report any misconduct or suspicious behavior, even if it involves their manager or any higher-level staff.

Reports can be submitted to the Ethics and Compliance Function via the email address:

etik@dcscustoms.com.tr.

DCS allows employees to report anonymously and treats such reports with the same seriousness. All reports are handled confidentially and with appropriate protections against retaliation, in accordance with the **Reporting, Consultation, and Non-Retaliation Policy**.

DCS is committed to promptly and fairly investigating all reports of policy violations. If a violation is confirmed, the company will take appropriate corrective action and work to remedy any harm caused.

9 | Review and Revision

This policy is reviewed at least once a year from its effective date to ensure compliance with local and international laws. The review process is carried out under the coordination of the Ethics and Compliance Function and the Human Resources and Support Services Directorate. The policy is updated as needed to reflect changes in applicable laws, standards, and DCS's business practices.

Other amendments and revisions are prepared by the Ethics and Compliance Function as a justified proposal based on the company's assessments related to the associated risks. These proposals are submitted to the Board of Directors and, upon approval, come into effect and are recorded through document management software.

DCS

**Compliance
Program**