

# CHILD LABOR, FORCED LABOR PREVENTION AND YOUTH EMPLOYMENT POLICY

**DCS**



# Child Labor, Forced Labor Prevention and Youth Employment Policy

## 1 Purpose

The DCS Child Labor, Forced Labor Prevention, and Youth Employment Policy sets forth DCS's commitment to strictly prohibit child labor and forced labor in its own operations and throughout its entire supply chain.

DCS pledges to uphold international standards on children's and workers' rights and to take all necessary measures to ensure that neither its operations nor the practices of its suppliers involve child labor or forced labor.

This policy also serves as a guide for all individuals, institutions, and organizations (suppliers) from whom the company procures goods or services.

No provision of this policy may contradict the applicable laws to which the company is subject.

## 2 Scope

This policy applies to all company employees, contractors, suppliers, and business partners, regardless of their position or role within DCS. It covers all aspects of DCS operations, including recruitment, placement, employment practices, and supply chain activities.

It also includes all subcontractors and third parties involved in the provision of goods and services to DCS. All business processes and procedures are to be developed, implemented, and audited in accordance with this policy.

## 3 Definitions

**Child Labor:** Any form of work that deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development. It includes work that is mentally, physically, socially, or morally dangerous and interferes with schooling.

**Young Worker:** An individual who has completed 15 years of age but has not yet reached 18 years of age.

**Minimum Employment Age:** The minimum legal age for employment as defined by local labor laws and International Labour Organization (ILO) conventions. The minimum employment age in DCS operations and supply chain shall be 15 or the higher age stipulated by local law.

**Hazardous Work:** Work that is inappropriate for individuals under 18 and involves risks of physical or psychological abuse, work in underground, high-altitude, or confined spaces, operation of dangerous machinery, lifting heavy loads, or exposure to high vibration, heat, or noise.

**Forced Labor:** Any work or service that is extracted from an individual under threat, coercion, or without consent, regardless of whether compensation is provided. It includes work performed under penalty, denial of legal rights, or off-the-record employment.

## 4 Policy Statements

### 4.1 Prohibition of Child Labor

DCS strictly prohibits child labor in all its operations and across its supply chain. Individuals below the legal minimum working age must not be employed under any circumstances by DCS or by its suppliers or business partners.

Even if local legislation allows exceptions, DCS does not permit children to work in hazardous or harmful job types that could negatively affect their health, safety, or physical, mental, and social development.

## 4.2 Prohibition of Forced Labor

DCS strictly prohibits all forms of forced labor in its own operations and supply chain. The company supports and upholds not only legal compliance but also dignified working conditions. This principle applies equally to DCS's suppliers and business partners.

Examples of forced labor include:

- Employment through debt bondage (working to repay debt);
- Creating situations where an individual cannot refuse or leave work freely;
- Employing individuals off-the-record or in violation of legal rights (wages, leave, social security, etc.);
- Employment of prisoners or convicts unless proven otherwise by court decision and under direct supervision of public authority.

## 4.3 Youth Employment

A young worker is above the legal child labor age but under 18. If within the scope of education, youth employment may be allowed outside of school hours.

Young workers must not be employed in hazardous work that could negatively impact their safety, health, or development. If the nature of the job is classified as "hazardous," no young worker may be employed under any condition.

- Young workers or interns at the company or its suppliers must be properly registered as required by local law.
- A rest break of 30 minutes is mandatory for jobs lasting more than 2 but less than 4 hours; a one-hour break is required for jobs lasting between 4 and 7.5 hours.
- Daily working hours for young workers must allow for 14 consecutive hours of rest within a 24-hour period.

## 4.4 Supplier and Business Partner Responsibilities

All suppliers, subcontractors, and business partners must comply with DCS's strict standards on child labor and forced labor. This includes adherence to local labor laws and international standards set by organizations such as the ILO and the United Nations.

Suppliers must not employ any individual below the legal minimum employment age. They must also ensure that young workers (typically aged 15–18) are not assigned to hazardous tasks.

Suppliers must acknowledge their understanding of this policy's principles and standards, commit not to employ child labor or implement forced labor practices, and adhere to national legislation and the principles of this policy for youth employment.

Suppliers must implement robust age verification procedures to ensure compliance and prevent underage employment.

## 4.5 Age Verification

DCS and its suppliers must apply rigorous age verification procedures during hiring to ensure that no children are employed. These processes should include checking identity documents, birth certificates, and other legal records confirming age.

Suppliers are responsible for maintaining accurate records of employee ages and must provide access to these records during audits and evaluations conducted by DCS.

## 4.6 Remediation and Support for Child Workers

If child labor is identified within DCS operations or the supply chain, immediate action will be taken to remove the child from the workplace. Where possible, the child will be supported through access to education, vocational training, and necessary rehabilitation services.

Suppliers found to employ child labor must take immediate corrective action. This includes halting the employment of underage workers, providing support to affected children, and reviewing employment practices to prevent recurrence.

DCS will collaborate with local authorities, NGOs, and relevant organizations to protect affected children and provide them with educational and developmental opportunities.

#### **4.7 Supplier Compliance and Contractual Obligations**

DCS includes specific provisions in all supplier contracts requiring compliance with this policy. These provisions outline consequences of non-compliance, including potential contract termination.

Suppliers must extend the requirements of this policy to their own suppliers and subcontractors to ensure the prohibition of child labor and forced labor throughout the supply chain.

DCS reserves the right to terminate relationships with suppliers found to be in violation of this policy.

#### **4.8 Training and Awareness**

DCS is committed to providing regular training to its employees, contractors, and suppliers to prevent child labor and forced labor. These trainings cover applicable legal regulations, ethical standards, and relevant provisions of this policy.

Training under this policy is mandatory for all DCS managers and employees. Suppliers and business partners are also encouraged to gain the awareness and knowledge required to act in accordance with these principles.

#### **4.9 Continuous Improvement**

DCS is committed to continuously improving its practices to prevent child labor and forced labor. This includes regular review and updates of this policy and collaboration with industry groups, NGOs, and other stakeholders to share best practices and strengthen supply chain standards.

Suppliers are encouraged to adopt a proactive approach by conducting self-assessments, improving employment practices, and engaging in dialogue with DCS to address concerns and eliminate child labor and forced labor.

## **5 Responsibilities**

### **5.1 Employees and Contractors**

- Fully understand and comply with the DCS Child Labor, Forced Labor Prevention, and Youth Employment Policy in all areas of responsibility.
- To report any concern, suspicion, or violation related to child labor or forced labor without delay to the Human Resources and Support Services Directorate and the Ethics and Compliance Function.
- Regularly participate in training and awareness programs related to this policy.

### **5.2 Managers**

- Ensure employees are informed of and comply with this policy.
- Monitor business activities for potential risks and address any arising issues.
- Support employees in raising and reporting concerns, ensuring all reports are taken seriously and investigated promptly.

### **5.3 Suppliers and Business Partners**

- Comply with the DCS Child Labor, Forced Labor Prevention, and Youth Employment Policy and apply similar standards within their own operations.
- Ensure all employees meet the minimum legal employment age and are not assigned to hazardous tasks if classified as young workers.

- Cooperate with DCS in audits and evaluations and take immediate corrective action if child or forced labor is detected.

#### 5.4 HR and Support Services Directorate & Ethics and Compliance Function

- Oversee the implementation of this policy and ensure DCS practices align with international child labor prevention standards.
- Conduct regular audits and evaluations across DCS operations and supply chains.
- Investigate reported incidents of child or forced labor and oversee the remediation process.

## 6 | Monitoring and Compliance

DCS will monitor compliance with this policy through regular audits and evaluations of both its own and its suppliers' operations.

Any violations of this policy will be investigated, and appropriate corrective measures will be taken, including termination of supplier contracts or disciplinary action for employees.

Evaluation of this policy is an integral part of regular compliance reporting.

## 7 | Breach of Policy

Non-compliance with this policy may result in serious consequences, including termination of employment or contractual agreements. In cases of child labor, DCS will work with local authorities to ensure the protection of the child's rights and implementation of appropriate legal measures.

## 8 | Reporting and Whistleblower Protection

DCS provides mechanisms for employees, suppliers, and other stakeholders to report concerns related to child labor and forced labor confidentially and without fear of retaliation. Employees must report any misconduct or suspicious behavior, regardless of the offender's position.

Reports can be submitted to the Ethics and Compliance Function via the email address:  
[etik@dcscustoms.com.tr](mailto:etik@dcscustoms.com.tr).

DCS allows anonymous reporting and treats all reports with equal seriousness. All reports are handled confidentially in accordance with the **Whistleblowing, Consultation, and Anti-Retaliation Policy**, ensuring protection for the whistleblower.

DCS is committed to promptly and fairly investigating all reported violations of this policy. If a violation is confirmed, appropriate corrective actions will be taken, and efforts made 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 Human Resources and Support Services Directorate and the Ethics and Compliance Function.

The policy will be updated as needed to reflect changes in international labor standards, legal requirements, and DCS's business practices.

Other amendments and revisions are prepared by the Ethics and Compliance Function as a justified proposal, based on the evaluations of the Human Resources and Support Services Directorate. These proposals are submitted to the Board of Directors and, upon approval, come into effect and are recorded through document management software.

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**Compliance  
Program**