

# ENVIRONMENTAL POLICY



**DCS**



Adapting to the Future

# Environmental Policy

## 1 Purpose

This policy demonstrates DCS's commitment to establishing an environmentally conscious and sustainable business model. The aim is to define core principles, strategies, and practices in environmental management to guide both internal stakeholders and external business partners in this domain.

DCS commits to minimizing environmental impacts across all operations, promoting the efficient use of natural resources, and ensuring full compliance with environmental regulations.

No element of this policy may contradict applicable legal regulations; compliance with all relevant legislation and regulations is a fundamental principle.

## 2 Scope

This policy applies to all DCS employees and encourages environmental sensitivity among business partners, suppliers, and other stakeholders affected by or contributing to the company's operations.

The policy aims to instill environmental responsibility wherever applicable and to embed this consciousness as an integral part of corporate culture. DCS is committed to taking all necessary steps to reduce environmental impact in its business processes and ensure continuous improvement

## 3 Definitions

**UN:** United Nations.

**UN Global Compact (UNGC):** A non-binding UN initiative encouraging companies worldwide to adopt sustainable and socially responsible practices. It aims to spread a common culture of sustainable global development.

**Sustainable Development Goals (SDGs):** A universal call to action adopted by UN member states, aiming to achieve defined targets by the end of 2030.

**Environment:** A holistic living space formed by the coexistence of living and non-living entities, including natural resources, air, water, soil, and ecosystems.

**Sustainability:** Balancing environmental, social, and economic needs to meet today's demands without compromising the ability of future generations to meet their own.

**Environmental Impact:** The positive or negative effects of an activity on air, water, soil, wildlife, and human health.

**Carbon Footprint:** The total amount of greenhouse gases emitted into the atmosphere due to corporate or individual activities, typically expressed in CO<sub>2</sub> equivalents (CO<sub>2</sub>e).

**CBAM (Carbon Border Adjustment Mechanism):** A trade regulation by the European Union that imposes a carbon cost on imported products with high carbon emissions.

**Waste Management:** The entire process of minimizing, separating, recovering, reusing, and disposing of waste at its source.

**Natural Resources:** Renewable (solar, wind, biomass) or non-renewable (oil, natural gas, minerals) resources provided by ecosystems and used in human activities.

# 4

## Policy Statements

### 4.1. General

DCS bases its environmental management on international agreements, national legislation, and standards. Environmental sustainability is considered an integral part of all company operations.

Accordingly, DCS:

- Carries out initiatives in line with the UN Global Compact and Sustainable Development Goals (SDGs).
- Aims to minimize environmental impacts in its activities and increase efficient use of energy and natural resources.

Environmental management strategies, procedures, and standards are developed and implemented under the leadership of the Environmental Board within the company.

### Environmental Board Structure:

The Environmental Board operates under the Sustainability Committee, which functions as a subcommittee of the Board of Directors.

### Board Chair:

Sustainability and Compliance Manager

### Board Members:

- Sustainability and Carbon (CBAM) Compliance Specialist / Environmental Engineer
- Deputy Director of Corporate Communications
- Deputy Director of Human Resources and Support Services
- Administrative Affairs and Procurement Manager

### 4.2. Core Principles and Commitments

DCS adopts the following principles and commitments under its Environmental Policy:

- Full compliance with all national and international environmental legislation and regulations.
- Integration of scientific developments and innovative technologies in environmental management.
- Setting measurable targets for improving environmental performance, with regular monitoring and reporting.
- Taking concrete steps to combat climate change and transition to a low-carbon economy.
- Focusing on recycling, reuse, and resource conservation in waste management, in line with circular economy principles.
- Implementing measures to prevent, reduce, and manage environmental risks, with regular evaluations.
- Establishing metrics to monitor and assess the environmental impacts of the hybrid working model and preparing improvement proposals based on data.
- Supporting the Turkish Foundation for Combating Soil Erosion, Reforestation, and the Protection of Natural Habitats (TEMA).

# 5

## Responsibilities

### 5.1 Employees

DCS employees play a key role in achieving environmental sustainability goals. Accordingly, all employees are expected to:

- Act in accordance with the Environmental Policy and offer suggestions to improve environmental performance.

- Participate in DCS-organized training on environment and sustainability and apply the knowledge gained in practice.

## 5.2 Managers

- Ensure employees are aware of and comply with the DCS Environmental Policy.
- Inform, motivate, and guide employees on environmental responsibilities.
- Review and improve business processes to support environmental performance targets.

## 5.3. Sustainability and Compliance Directorate & Environmental Board

- Coordinate the implementation of the Environmental Policy and determine corporate environmental strategies.
- Monitor and report on environmental performance indicators and evaluate continuous improvement opportunities.
- Follow legal regulations and sectoral developments and propose policy updates.
- Audit environmental practices and report regularly to the Sustainability Committee.

## 5.4 Suppliers and Business Partners

- Work in harmony with the DCS Environmental Policy and adopt practices aimed at reducing environmental impact.
- Comply with current environmental legislation, regulations, and industry standards in their operations.
- Develop and document responsible practices in areas such as energy efficiency, waste management, use of hazardous chemicals, and natural resource consumption.
- Contribute to the prevention of environmental risks and the creation of a sustainable supply chain.
- Provide relevant environmental data, documents, and reports when required and participate in related cooperation processes.

# 6 | Training and Awareness

DCS is committed to implementing regular training programs to ensure all employees act consciously on environmental and sustainability issues.

- Environmental and sustainability training will be included as part of the onboarding process for new employees and will be periodically updated for current employees.
- The training programs aim to strengthen compliance with the Environmental Policy, enhance understanding of environmental impacts, and foster continuous awareness.

# 7 | Monitoring and Implementation

- The implementation of the policy is regularly monitored by the Environmental Board, and the results are reported to the Sustainability Committee.
- In cases where the policy conflicts with any local or international environmental regulations, the more restrictive regulation shall prevail.
- Business partners are expected to act in accordance with this Policy. DCS emphasizes environmental responsibility across all partnerships and will take necessary steps, including guidance and information sharing, to ensure compliance.

## 8 Breach of Policy

- DCS is aware that violations of the Environmental Policy can increase environmental impacts and therefore adopts a zero-tolerance approach to such cases.
- Any breach of the Environmental Policy by employees, managers, suppliers, or business partners will be evaluated according to internal procedures, and corrective/preventive actions will be taken as deemed necessary.
- In case of policy violations, the individuals or units involved are expected to take responsibility for resolving the non-compliance and preventing its recurrence.

## 9 Reporting and Whistleblower Protection

DCS provides mechanisms for employees, suppliers, and stakeholders to report environmental concerns confidentially and without fear of retaliation. Employees must report any misconduct or suspicious behavior, regardless of the status of the person involved, including managers or superiors.

Reports can be submitted to the Sustainability Committee via email at [sustainability@dscustoms.com.tr](mailto:sustainability@dscustoms.com.tr) or in person.

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

## 10 Review and Revision

To maintain its relevance and effectiveness, this policy is reviewed at least once a year from the date of enactment. The review process is coordinated by the Sustainability and Compliance Directorate and the Sustainability Committee.

The policy will be updated as necessary to reflect changes in relevant standards, legal regulations, and DCS business practices.

Other revision and change requests will be submitted to the Board of Directors with a justified proposal prepared by the Sustainability and Compliance Directorate following evaluation by the Sustainability Committee. Approved changes will take effect and be recorded and published via the corporate document management system.

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