

# ETHICAL EMPLOYMENT POLICY

**DCS**



# Ethical Employment Policy

## 1 Purpose

The purpose of the DCS Ethical Employment Policy is to adopt an approach based on ethical values in all employment processes. Within this scope, recruitment, working conditions, career development, and termination processes are carried out in a manner that is respectful of human dignity, fair, transparent, inclusive, and in compliance with international standards.

DCS is committed to providing its employees not only with a work environment but also with a system in which their rights are protected, equal opportunities are guaranteed, and an employment approach based on ethical principles is implemented.

Accordingly, the employment policy is based on the principles of placing the right person in the right job, the principle of equal pay for equal work, merit-based achievement, and providing equal opportunities for all. Respect for human and labor rights lies at the center of all human resources processes.

This approach not only increases DCS's efficiency but also enables its employees to grow and develop in a fair, inclusive, and sustainable work environment.

This policy is implemented in integration with DCS's Code of Business Ethics and Conduct and related policies. It aims to ensure that employees are informed and kept up to date about ethical risks such as conflicts of interest, misconduct, or abuse of authority. At the same time, it serves as a guarantee that the principles and rules are understood and that commitment to compliance with them is secured.

## 2 Scope

This policy applies to all employees of DCS, including Members of the Board of Directors, as well as candidates in the recruitment process.

The policy covers all stages of employment, including recruitment, promotion, training, remuneration, career development, and termination.

Ethical employment responsibilities concerning suppliers and business partners are separately regulated under the DCS Human Rights Policy and the Supply Chain Code of Conduct.

There are no exceptions to this Policy. All employees and managers are obliged to fully comply with the principles and provisions of this policy.

## 3 Principles of Ethical Employment

DCS undertakes to comply with all applicable labor laws and regulations.

The Policy is also implemented within the framework of:

- The United Nations Global Compact (UNGC) Principle 6 (elimination of discrimination in respect of employment and occupation),
- GRI 401–406 standards (employment, labor–management relations, training, diversity, and non-discrimination).

DCS is committed to the following principles to ensure ethical employment:

- All employment processes are conducted in an open, transparent, and fair manner.
- Merit, competence, and performance are taken as the basis in recruitment and career development.
- The principle of equal pay for equal work is observed; fairness is ensured in remuneration and benefits.
- Diversity and differences are embraced as a richness of corporate culture, and no tolerance is shown to discrimination in any form.

- Employees' freedom of association and collective bargaining rights are guaranteed.
- Training and development opportunities are offered equally to all employees.
- Providing a healthy, safe, and inclusive working environment is a fundamental part of ethical employment.
- In the case of re-employment of a former employee, the condition is that their employment contract was not previously terminated due to a violation of the Fundamental Principles of Business Ethics and Code of Conduct.

The Ethical Employment Policy is implemented in conjunction with the following policies:

- Human Rights Policy
- Anti-Discrimination and Anti-Harassment Policy
- Conflict of Interest Prevention Policy
- Child Labor, Forced Labor, and Young Employment Policy
- Workplace Safety Policy

## 4 Responsibilities

### 4.1. Board of Directors

- Approves the Policy; allocates necessary resources and authority for its implementation; oversees periodic reports.

### 4.2. Managers

- All company managers are responsible for ensuring that the principles and provisions of this policy are reliably implemented within their areas of responsibility. In cases of non-compliance, they are to ensure that necessary steps are taken promptly, fairly, and decisively.
- Prevent discriminatory practices in recruitment decisions.
- Ensure that recruitment, orientation, performance, and disciplinary processes are carried out in accordance with the Policy and maintain confidentiality.

### 4.3. Human Resources and Support Services Directorate

- Regularly reviews ethical employment practices and updates them in line with legislative changes and international standards.
- Develops fair and transparent practices in recruitment and employment processes.
- Conducts compliance verification steps (reference/background checks) in accordance with legislation.
- Manages processes related to employee candidates and existing employees in line with the Statement of Compliance with the Principles of Business Ethics and Code of Conduct Instruction.

### 4.4. Ethics and Compliance Function

- Provides guidance and consultation on the Policy and the Fundamental Principles of Business Ethics and Code of Conduct.
- Proposes corrective/preventive actions in cases of non-compliance.

### 4.5. Employees

- Provide accurate and complete information in recruitment and employment processes (CV, diplomas, certificates, etc.) and refrain from misleading statements.
- Conduct all business activities in compliance with DCS's Principles of Business Ethics and Code of Conduct and applicable legislation.
- Comply with rules relating to equal opportunity, non-discrimination, prohibition of harassment and mobbing, and maintaining a respectful and safe work environment.
- Declare potential conflicts of interest or situations that may create such perceptions before they arise and support the implementation of necessary preventive measures.

## 5 | Training and Awareness

- As part of the recruitment process and regular refresher programs, DCS provides training on ethical employment principles, equal opportunity, prohibition of discrimination, prevention of harassment and mobbing, conflict of interest, protection of personal data and confidentiality, reporting channels, and prevention of retaliation.
- Training is provided to new employees during the orientation program and is updated and implemented annually as mandatory training for all employees.

## 6 | Data Protection and Confidentiality

All information related to company employees and recruitment/hiring processes is confidential and under the protection of the company.

When a former employee applies for a new job and a potential employer requests a reference, such request must be in writing. Responses must not include any information regarding the employee's private life, religious beliefs, ethnic origin, cultural or political views, or sexual orientation.

## 7 | Monitoring and Compliance

- DCS conducts regular audits and assessments to ensure compliance with this Policy and to identify potential risk areas.
- Recruitment and promotion records, job postings, interview notes, and evaluation forms are reviewed for equal opportunity and impartiality.
- Compliance indicators (e.g., training completion rates, number of reports, and closure times) are periodically monitored and reported to senior management.
- Root cause analysis is conducted for identified violations, and preventive/corrective controls are incorporated into processes.

## 8 | Non-Compliance with the Policy

The implementation of this policy is measured and monitored through periodic surveys, audits, compliance assessments, and self-assessment tools. The results obtained are evaluated by relevant functions for the purpose of continuous improvement.

Violation of this Policy may result in sanctions under the Disciplinary Regulation, including warnings up to termination of employment. For candidates, it may result in termination of the recruitment process.

Depending on the nature of the violation, necessary steps may be taken in accordance with applicable laws, including recourse to legal authorities.

Process and training updates are carried out to prevent recurrence of improper practices.

## 9 | Reporting and Protection of Whistleblowers

DCS provides mechanisms for employees and candidates to report concerns related to violations of this Policy confidentially and without fear of retaliation.

Employees are obliged to report any misconduct or suspicious situation they encounter, even if the individuals involved are their managers or superiors.

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

DCS grants employees and candidates the right to submit reports anonymously and treats anonymous reports with the same seriousness. All reports are handled confidentially in accordance with the Whistleblowing, Consultation, and Non-Retaliation Policy, ensuring measures to protect the reporting individual against retaliation.

DCS is committed to investigating all reports of violations of this policy promptly and fairly. In the event of confirmation of a violation, the company will take appropriate corrective measures and work to remedy any harm caused.

## 10

### **Review and Revision**

This policy shall be reviewed at least once a year from the date of entry into force for compliance with local and international law. The review process is carried out in coordination between the Human Resources and Support Services Directorate and the Ethics and Compliance Function.

Amendments and revisions are prepared to reflect applicable laws, international standards, and changes in DCS's business practices. Prepared amendments are submitted to the Board of Directors, and upon approval, they enter into force and are recorded through the document management system.

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**Compliance  
Policy**