

FAIR COMPETITION POLICY

DCS



Fair Competition Policy

1 Purpose

The purpose of DCS's Fair Competition Policy is to ensure that all commercial activities are conducted in a manner that promotes fair competition, complies with antitrust and competition laws, and preserves market integrity.

This policy reinforces DCS's commitment to ethical business practices.

2 Scope

This policy applies to all DCS employees, contractors, consultants, and third-party stakeholders. It covers all business activities, including interactions with competitors, customers, suppliers, and other stakeholders.

3 Definitions

Fair Competition: Conducting business in a way that does not distort or restrict competition. This includes complying with laws that prohibit monopolistic practices, price-fixing, market allocation, bid rigging, and other anti-competitive behavior.

Antitrust Laws: Regulations designed to promote fair competition and prevent unlawful monopolies, cartels, and unfair trade practices. These laws vary by jurisdiction but generally aim to protect consumers and provide a level playing field for businesses.

Market Allocation: An illegal agreement between competitors to divide markets based on geography, customers, or product type.

Price-Fixing: An illegal agreement between competitors to set prices at a certain level instead of allowing market competition to determine pricing.

4 Policy Statements

4.1 Commitment to Fair Competition

DCS is committed to competing in the marketplace based on merit, quality, and innovation. The company will not engage in or tolerate any practices that undermine fair competition or violate antitrust laws.

Employees must act with integrity and ensure all competitive practices comply with legal and ethical standards.

4.2 Prohibition of Anti-Competitive Practices

Price-Fixing: DCS strictly prohibits any formal or informal agreement with competitors to fix, raise, lower, or stabilize prices.

Market Allocation: DCS employees must not enter into agreements with competitors to divide markets, territories, or customers. Market allocation is illegal and contradicts DCS's commitment to fair competition.

Bid Rigging: DCS prohibits any form of bid rigging, including secret agreements with competitors to manipulate the outcome of tenders or bids. All proposals submitted by DCS must be genuine, competitive, and based on an honest assessment of the bid requirements.

Boycotts: DCS employees must not organize or participate in any group boycott that aims to restrict competition or coerce market participants into specific behavior.

4.3 Interactions with Competitors

Employees must exercise caution when engaging with competitors, whether in formal meetings, industry associations, or informal settings. Discussions with competitors must avoid topics such as pricing, market strategies, or customer allocation that could be perceived as anti-competitive.

All interactions with competitors must be conducted transparently, in compliance with the law, and with a legitimate business purpose.

4.4 Compliance with Antitrust Laws

DCS will comply with all applicable antitrust and competition laws in the jurisdictions where it operates. This includes understanding and adhering to specific legal requirements in different regions.

Employees involved in activities that may affect competition—such as pricing, marketing, or partnerships—must be knowledgeable about relevant antitrust laws and seek legal advice when in doubt.

5 Responsibilities

5.1 Employees

- Conduct all business activities in a way that promotes fair competition and complies with this policy
- Avoid any discussion, agreement, or behavior that could be perceived as anti-competitive or in violation of antitrust laws
- To report all concerns and potential violations to their managers or the Ethics and Compliance Function.

5.2 Managers

- Ensure that employees understand and comply with the Fair Competition Policy and relevant antitrust laws
- Monitor business activities for potential competitive risks and address any issues that arise
- Encourage employees to report concerns and ensure that all reports are taken seriously and addressed promptly

5.3 Ethics and Compliance Function

- Provide guidance and training on antitrust laws and fair competition practices
- Review business practices and contracts to ensure compliance with competition laws
- Investigate reported violations and take appropriate corrective actions

6 Training and Awareness

DCS will provide training on fair competition and antitrust laws as part of the onboarding process and through regular refresher courses.

Employees will be informed about the risks of anti-competitive practices and the importance of maintaining a fair marketplace.

7 Monitoring and Compliance

DCS will conduct regular audits and assessments to ensure compliance with this policy and identify potential risk areas.

Evaluation of this policy is part of regular compliance reporting.

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Violations of the Policy

Violations of this policy may result in various sanctions, including termination of employment or contracts. Depending on the seriousness of the incident and the circumstances involved, legal action may be taken against individuals or entities found to have violated antitrust laws.

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Reporting and Protection of Whistleblowers

DCS provides mechanisms for employees, suppliers, and other stakeholders to report concerns regarding violations of this Policy confidentially and without fear of retaliation. Employees must report any misconduct or suspected misconduct, regardless of the position of the individual involved, even if they are managers or superiors.

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

etik@dcscustoms.com.tr.

DCS also allows anonymous reporting and treats such reports with the same seriousness. All reports are handled in accordance with the **Policy on Reporting, Consultation, and Protection Against Retaliation**, ensuring confidentiality and safeguards against retaliation.

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

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Review and Revision

This policy is reviewed at least once a year from the date it comes into effect, to ensure compliance with local and international laws. The review process is carried out under the coordination of the Ethics and Compliance Function. The policy is updated when necessary to reflect changes in applicable laws, standards, and DCS's business practices.

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

DCS

**Compliance
Program**