

HUMAN RIGHTS POLICY

DCS



Human Rights Policy

1 Purpose

The DCS Human Rights Policy demonstrates the company's commitment to respecting and promoting human rights in all aspects of its business operations.

DCS is committed to:

- The Universal Declaration of Human Rights (1948)
- UN Guiding Principles on Business and Human Rights (2011)
- United Nations Global Compact (2000)
- ILO Declaration on Fundamental Principles and Rights at Work (1998)
- OECD Guidelines for Multinational Enterprises (2011)
- Women's Empowerment Principles (WEPs) (2011)
- ILO Convention No. 182 on the Worst Forms of Child Labour (1999)
- Supporting the principles set out in national labor law and relevant legal regulations, and integrating decent work practices that honor human dignity into all its business processes.

This policy also serves as a guideline for all individuals, institutions, and organizations (Suppliers) with whom the company engages in the procurement of goods or services.

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

2 Scope

This policy applies to all DCS employees, contractors, suppliers, and business partners. It covers all aspects of DCS's operations, including interactions with employees, customers, suppliers, and the communities in which it operates.

All business processes and relevant procedures are prepared, implemented, and audited in accordance with this policy.

3 Definitions

Human Rights: Universal and inalienable entitlements inherent to all individuals simply by being human, protected by legal frameworks. These include, but are not limited to, the right to work, fair remuneration, non-discrimination, freedom of association, and a safe and healthy environment.

Forced Labor: Work performed involuntarily under threat, coercion, or without proper consent, regardless of whether compensation is provided. It includes denial of legal rights or undocumented labor under duress.

Child Labor: As defined by ILO standards, work that deprives children of their childhood, potential, 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.

Discrimination: Any distinction, exclusion, or preference based on race, color, sex, religion, political opinion, national or social origin, or any other status that impairs equality of opportunity or treatment in employment or occupation.

Women's Empowerment Principles (WEPs): A joint initiative by UN Women and the UN Global Compact, providing seven principles that guide businesses in promoting gender equality and empowering women through policies, practices, and reporting.

4

Policy Statements

4.1 Commitment to Human Rights

DCS is committed to respecting and protecting human rights in all business operations. This includes treating all employees and stakeholders with dignity and respect and safeguarding their fundamental rights.

DCS will not engage in or support any activity that violates human rights, including forced labor, child labor, human trafficking, or any form of exploitation.

4.2 Non-Discrimination and Equal Opportunity

DCS is committed to providing a workplace free from discrimination, harassment, and retaliation. All employment decisions, including recruitment, compensation, promotion, and termination, will be based on merit, qualifications, performance, and business needs, regardless of race, color, religion, gender, sexual orientation, national origin, age, disability, or other protected attributes.

DCS supports equal opportunities for all employees and promotes workplace diversity and inclusion.

DCS ensures compliance with all legal regulations concerning working hours, overtime, breaks, weekends, and annual paid leave, prioritizing employee well-being.

The principles adopted in this context are detailed in the **Anti-Discrimination and Harassment Policy**.

4.3 Prohibition of Forced and Child Labor

DCS strictly prohibits forced labor, including bonded labor, involuntary prison labor, or labor under threat of penalty. All work must be voluntary, and workers must be free to leave their jobs at any time.

DCS is committed to eliminating child labor in its operations and supply chain. The company will not employ individuals below the minimum working age as defined by local laws and ILO conventions. Any work performed by young workers must be safe, non-hazardous, and must not interfere with their education.

These principles are further outlined in the Policy on **Prevention of Child Labor, Forced Labor, and Youth Employment**.

4.4 Freedom of Association and Collective Bargaining

DCS respects the rights of all employees to form, join, or not join trade unions of their choice. DCS will engage with employee representatives in good faith and respect the right to peaceful assembly.

Employees will not face discrimination, harassment, or retaliation for exercising their rights to freedom of association.

4.5 Health and Safety

DCS is committed to providing a safe and healthy working environment for all employees and contractors. This includes compliance with applicable health and safety laws and regulations, and implementation of best practices to minimize workplace hazards.

DCS will regularly assess and mitigate health and safety risks and will ensure all employees are informed and trained in safety protocols.

Within this scope, the fundamental principles of DCS's occupational health and safety are set out in detail in the **Workplace Safety Policy**.

4.6 Supplier and Business Partner Responsibilities

DCS expects all suppliers and business partners to comply with the high human rights standards outlined in this policy. Suppliers must comply with all applicable labor and employment laws and regulations.

DCS will conduct due diligence and regular assessments of suppliers and partners to ensure compliance. Any supplier found to violate these standards may be subject to corrective actions, including termination of the business relationship.

4.7 Social Impact

As a responsible corporate citizen, DCS is aware of the social impact of its operations and relationships. The company aims to contribute positively to society and lead sectoral improvements. When necessary, DCS will engage with associations, municipalities, and civil society organizations to address and improve human rights impacts.

4.8 Continuous Improvement

DCS is committed to continuously improving its human rights practices. This includes regularly reviewing and updating the policy, sharing best practices, and working with industry groups, NGOs, and other organizations to enhance supply chain standards.

Suppliers are encouraged to adopt a proactive approach to preventing human rights violations, including conducting self-assessments, improving employment practices, and engaging in dialogue with DCS.

5

Responsibilities

5.1 Employees and Contractors

- Understand and comply with the DCS Human Rights Policy
- To report suspected human rights violations or concerns to the Ethics and Compliance Function.
- Participate in DCS-provided human rights training and related education

5.2 Managers

- Ensure employees are aware of and comply with the DCS Human Rights Policy
- Monitor business activities for potential human rights risks and address emerging issues
- Encourage employees to raise concerns and ensure all reports are taken seriously and investigated promptly

5.3 Suppliers and Business Partners

- Comply with this policy and adopt similar standards in their operations
- Ensure all employees work under conditions that are legally compliant and dignified
- Cooperate with DCS in audits and assessments and take immediate corrective actions if violations are identified.

5.4 HR and Support Services Directorate & Ethics and Compliance Function

- Provide guidance and training on human rights standards and ensure effective implementation of the DCS Human Rights Policy
- Identify training needs and plan and track employee training on human rights
- Conduct regular assessments of human rights risks and work with management to address identified issues
- Investigate reported human rights violations and oversee the remediation process

6 | Training and Awareness

DCS will provide regular training to employees, contractors, and suppliers on human rights, including how to identify and prevent violations.

Training will be included in the onboarding process and will be refreshed periodically to maintain awareness and compliance.

7 | Monitoring and Compliance

DCS will conduct regular audits and evaluations to monitor compliance with this policy and identify areas for improvement.

Policy evaluation is part of regular compliance reporting.

8 | Breach of Policy

Failure to comply with this policy may result in disciplinary action, including warning, training, reassignment, or termination of employment, depending on the severity of the case. Where possible, non-compliances are first addressed through corrective measures. However, serious violations may lead to termination of employment or contractual relations, and legal action may be initiated in accordance with the circumstances.

9 | Reporting and Whistleblower Protection

DCS provides mechanisms for employees, suppliers, and stakeholders to report human rights concerns confidentially and without fear of retaliation. Employees must report misconduct or suspected violations involving anyone, including managers or superiors.

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

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

DCS is committed to promptly and fairly investigating all human rights complaints. If a violation is confirmed, appropriate corrective measures will be taken, and all damages will be remediated.

10 | Review and Revision

This policy will be reviewed at least once a year from its effective date to ensure compliance with local and international laws. The review process will be carried out in coordination with the Human Resources and Support Services Directorate and the Ethics and Compliance Function.

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

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

DCS

**Compliance
Program**