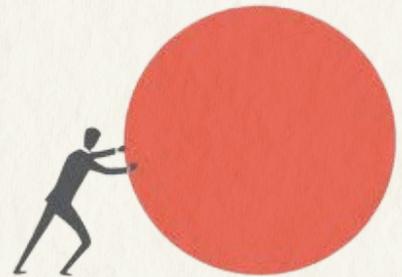


# **THIRD-PARTY RELATIONS PRINCIPLES AND RULES**



**DCS**



**Ethics and Compliance**

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# Third-Party Relations Principles and Rules

We bring together economic, environmental, and social sustainability in supply chain management.

DCS operates within the framework of the **Fundamental Business Ethics Principles, Code of Conduct**, and relevant **corporate policies** established by the explicit will and decisions of the DCS Board of Directors, expecting all internal and external stakeholders to act in accordance with the same ethical values and policies.

The Third-Party Relations Principles and Rules define DCS's approach to collaboration with third parties and set the ethical values and social responsibility standards that must be observed in all related business activities and processes.

Our goal is to ensure that all our stakeholders act in compliance with the same principles, rules, and values that we uphold internally and externally, creating a consistent ethical ecosystem.

For this reason, all third parties wishing to engage in business with DCS must commit to adhering to these Principles and Rules, which constitute a prerequisite for establishing or maintaining a business relationship with our company.



# DCS Sustainable Procurement Statement

DCS's global citizenship commitment covers all procurement and business partnership activities.

We are aware that our purchasing decisions have both social and environmental impacts, and we support conducting these decisions in a responsible and sustainable manner.

While prioritizing suppliers based on environmental and circular economy principles, DCS aims to build relationships with third parties based on transparency, honesty, and mutual trust, ensuring that all cooperation benefits both sides in a fair and sustainable way.

Accordingly, we expect our partners to adhere to high ethical standards and to take measures to prevent any form of non-compliance.

DCS's Sustainable Procurement Approach is based on, but not limited to, the following key principles:

## **Scope and Applicability**

These Principles and Rules apply to any individual or organization engaged in a business relationship with DCS, including all assigned personnel (such as subcontractors). All relevant parties must take necessary measures to ensure compliance with the Third-Party Relations Principles and Rules.

If DCS determines that these principles are not being followed or suspects a violation, the third party must promptly inform DCS, share relevant details, and provide clear information to remove or clarify the issue as soon as possible.

If a supplier fails to meet the requirements outlined in these rules, DCS reserves the right to review, suspend, or terminate the contract, and to exercise any legal rights arising from such a breach.

In this context, suppliers are expected to act in full compliance with DCS's ethical, legal, and sustainability standards throughout the contract period.

## **On-Site Audits**

DCS may, directly or through an independent third party authorized by DCS, conduct on-site audits to verify compliance with these principles, legal obligations, and contractual terms. During these audits, suppliers are required to provide full access to relevant facilities, documentation, and personnel to ensure transparent evaluation.

Any identified non-compliance must be promptly addressed through corrective and preventive action plans prepared in coordination with DCS.

## **Regulatory Compliance**

All third parties doing business with DCS must ensure that their operations comply with current laws, industry regulations, and applicable governance principles. Any violations or irregularities identified during business activities must be promptly communicated to DCS.

## **Procurement Integrity**

DCS acts with integrity throughout its procurement processes, ensuring that all goods and services are sourced ethically and responsibly.

In addition, all third parties working with DCS must acknowledge and adhere to **human rights and labor standards, environmental responsibility, anti-bribery and corruption, data privacy, and ethical commitments.**

# Supplier Risk Assessment

Risks related to suppliers and solution partners are systematically evaluated based on ethical compliance, legal conformity, information security, contractual obligations, and sustainability criteria.

Within this scope:

- The Third-Party Relations Principles and Rules are published on our website and are publicly accessible to all suppliers.
- Special procedures have been established to assess supplier risks, mitigate them, and take necessary precautionary measures.

During procurement processes, operations are carried out in line with the **New Supplier Identification Procedure, Existing Supplier Evaluation Procedure, and Subcontractor and Supplier Management Procedures.**

Furthermore, business relations are not established with organizations that do not acknowledge and approve the Third-Party Relations Principles and Rules.

All approved suppliers are required to sign the following commitment documents:

- Supplier Explicit Consent Statement
- Supplier Information Notice
- Supplier Confidentiality Undertaking
- Third-Party Relations Principles and Rules
- Confidentiality and Personal Data Protection Agreement
- Ethics and Compliance Checklist (where applicable)

In addition, suppliers identified as high-risk are provided with the Ethics and Compliance Control Checklist for further evaluation.

This structured approach enables DCS to proactively identify potential supplier-related risks and to strengthen sustainable business partnerships through transparent and ethical practices.

# Human Rights and Labor Standards

## Human Rights

Within the scope of the DCS **Human Rights Policy**, we fully support international conventions ratified by Türkiye, as well as all relevant local and national legislation. We expect all third parties to respect and protect human rights — including employee rights — in all of their business activities.

## Ethical Employment

DCS conducts all its operations in line with the **Ethical Employment Policy**, promoting equal opportunities and a discrimination-free working environment.

DCS and its partners are strictly prohibited from employing child labor, engaging in forced labor, or exploiting workers in any form.

We expect all suppliers and partners to comply with ILO Conventions, the Universal Declaration of Human Rights, and the UN Global Compact Principles, adopting a zero-tolerance approach to slavery, human trafficking, and forced labor.

## Fair Pay and Employee Rights

DCS considers fair compensation based on employees' skills and contributions a fundamental principle.

Suppliers are expected to follow the same principle, ensuring that wages meet at least the minimum legal requirements and are paid on time in full compliance with applicable labor laws.

All overtime work must be voluntary, fairly compensated, and in accordance with legal requirements.

Workers must receive proper rest periods, and their working hours must never exceed statutory limits.

## Non-Discrimination and Anti-Harassment

DCS strictly prohibits any form of discrimination or harassment, and guarantees equal employment opportunities for all individuals regardless of:

- Race, language, religion, color, gender, gender identity, sexual orientation, age, disability, marital status, pregnancy, or any other status protected by law.

Under the DCS **Anti-Discrimination and Anti-Harassment Policy**, any form of harassment is strictly forbidden. DCS ensures that all working environments are free from intimidation or violence and that all employees are treated with dignity and respect.

We promote gender equality and the protection of women's rights as a priority, fostering an inclusive culture where diversity is embraced as a source of strength and enrichment.

## **Forced Labor**

Under the DCS Policy on the **Prevention of Child and Forced Labor and Youth Employment**, all forms of forced or compulsory labor — including bonded labor, involuntary prison labor, and labor under threat or coercion — are strictly prohibited.

In line with Türkiye's international obligations, DCS suppliers must not engage in or benefit from any form of forced labor.

Forced labor includes situations where workers are compelled to work against their will through coercion, threats, physical violence, or the withholding of identification, passports, or wages. Any employment involving restriction of movement, physical punishment, debt bondage, or other means of coercion is strictly classified as forced labor and is unacceptable.

## **Freedom of Association and Collective Bargaining**

DCS recognizes every employee's right to join or not join a union as a matter of personal choice.

Suppliers must respect their employees' rights to organize, form trade unions, and engage in collective bargaining. These rights must be upheld in accordance with national legislation and international labor standards.

## **Child Labor**

DCS upholds children's right to education and development. Therefore, no supplier may employ any child labor, whether part-time or full-time, under any circumstances.

Child labor includes employing anyone under the legal minimum age or compelling minors to leave education prematurely for work.

In line with ILO Conventions, suppliers must not employ children in any form of work that may harm their physical, mental, or emotional well-being.

For young workers (aged 15–18), suppliers must ensure compliance with legal regulations and the ILO Minimum Age Convention, guaranteeing that their work does not interfere with education or development.

In general, children under 18 must:

- Not perform hazardous work.
- Not work at night or under unsafe conditions.
- Receive adequate rest and protection of their physical and mental health.

Suppliers are responsible for proving that young workers operate in environments that are physically, mentally, and emotionally safe, ensuring they are not exposed to any harmful or exploitative conditions.

## **Working Environment**

Under the DCS Workplace Safety Policy, we uphold the fundamental human right to healthy and safe working conditions.

Third parties must ensure a lawful, safe, and decent working environment for all employees.

At a minimum, suppliers are expected to:

- Fully comply with all applicable occupational health and safety laws and regulations in their workplaces.
- Refrain from assigning workers to hazardous tasks without proper protection.
- Provide personal protective equipment (PPE) and appropriate training for its correct use.
- Comply with all legal requirements and standards related to construction safety, fire prevention, and alarm systems.
- Ensure adequate lighting and ventilation across all facilities.
- Store all hazardous materials in safe locations and handle them securely and in a controlled manner.
- Maintain and properly service all machinery and equipment.
- Keep all facilities related to dining, rest, and accommodation clean, safe, and hygienic.

## **Emergency Preparedness**

Suppliers must be adequately prepared for emergencies. This includes having clear reporting and evacuation procedures, regular emergency training and drills, proper first-aid equipment, effective fire detection and suppression systems, and sufficient emergency exits.

Suppliers must also provide regular training to employees on emergency planning, response, and medical care, and conduct periodic drills to ensure readiness.

## **Service Quality and Reliability**

DCS prioritizes working with suppliers that are ethical, local, deliver high-quality products and services, support women's entrepreneurship, build inclusive supply chains, and embrace circular economy principles. These relationships are based on long-term trust and collaboration.

Procurement decisions are made considering criteria such as durability, quality, material selection, repairability, interchangeability of parts, and recyclability. This approach aims to improve efficiency, reduce costs, minimize waste, and maintain a sustainable balance between price and performance.

All products and services provided by suppliers must fully comply with applicable legal regulations, quality and safety standards, and DCS's ethical principles and policies.

# Environment

As part of its environmental and sustainability policies, DCS conducts its operations in line with Environmental, Social, and Governance (ESG) values — aiming to contribute to a sustainable future and create long-term value for all stakeholders.

We act with environmental awareness in all our procurement processes.

Suppliers are expected to identify, minimize, and control potential environmental risks arising from their operations and to implement or adapt effective environmental management systems, policies, or declarations accordingly.

This system is expected to focus on measuring, monitoring, and continuously improving environmental performance.

DCS evaluates suppliers and third parties based on their ability to make conscious choices, reduce environmental impact, and adopt low-impact solutions.

Within this scope, third parties are expected to:

- Actively take measures to prevent pollution and minimize material consumption.
- Ensure that chemicals and hazardous substances are handled, stored, and disposed of in ways that prevent environmental harm.
- Ensure that volatile organic compounds (VOCs), aerosols, solvents, particulates, and ozone-depleting substances are properly identified, monitored, and controlled in compliance with applicable regulations.
- Manage wastewater, solid waste, and sanitary waste systems responsibly, ensuring safe disposal or treatment before discharge.
- Ensure that materials and products are recyclable or reusable whenever possible.
- Participate in employee training programs designed to raise environmental awareness and promote sustainable practices.

# Anti-Corruption

## Anti-Corruption

DCS's **Anti-Bribery and Anti-Corruption Policy** explicitly prohibits all forms of bribery and corruption. The policy defines responsibilities for DCS employees, suppliers, and business partners regarding the prevention, detection, and reporting of such practices.

No DCS employee, supplier, or business partner shall, directly or indirectly, offer, promise, authorize, or give any payment, gift, or advantage to any government official, public institution representative, political party, or private company employee to obtain or retain business or gain an improper advantage. DCS adopts a **zero-tolerance** approach to all forms of bribery and corruption and will not condone any behavior contrary to this principle.

## Financial Integrity

All financial records, statements, and reports must be accurately and truthfully documented. Any transactions related to DCS or its contracts must be properly recorded and supported by verifiable documentation. Oral or undocumented agreements should be avoided.

Documents must not be altered, falsified, or signed by unauthorized persons. No entries or records may be made with the intent to misrepresent or conceal any transaction related to DCS operations.

Financial statements must accurately reflect the company's assets, liabilities, and transactions in accordance with applicable laws and accounting standards. Misleading or false entries are strictly prohibited.

## Prevention of Tax Evasion and Fraudulent Activities

DCS, its employees, suppliers, and business partners must not engage in or support any form of tax evasion, fraud, or misrepresentation.

All declarations and invoices must be truthful, accurate, and fully compliant with applicable laws.

Suppliers are expected to avoid any behavior that may constitute tax evasion or fraudulent activity and to refrain from submitting or accepting false or misleading information or documents.

# Ethics

## **Conflict of Interest**

The term “**conflict of interest**” refers to any situation that may raise doubts about an individual’s ability to act impartially in matters concerning DCS’s interests.

Under the **Conflict of Interest Prevention Policy**, DCS employees and third parties must remain independent from any personal or financial interests that could conflict with the company’s business.

Conflicts of interest may arise in various ways. Employees must disclose to DCS any potential or existing conflicts of interest involving themselves or those they are associated with.

## **Gifts and Business Courtesies**

In line with the **Gift and Hospitality Policy**, any expenses or gifts given to or received by DCS personnel or representatives must be reasonable, lawful, and appropriate to the nature of the business relationship. Such gestures must never be intended or perceived to improperly influence a business decision.

Under no circumstances should employees offer or accept gifts, hospitality, or advantages that could compromise professional judgment. Any business-related gift or entertainment must comply with applicable laws and DCS’s internal policies.

When uncertain about the appropriateness of a gift or invitation, employees must consult with their manager or the Ethics and Compliance Function.

## **Fair Competition**

In accordance with the Fair Competition Policy, DCS strictly prohibits any form of cartelization, market manipulation, or unfair competition.

We comply fully with the laws and regulations of Türkiye and all countries in which we operate. These laws generally prohibit agreements or practices that restrict fair competition, such as price fixing or market division. DCS upholds these principles in all business relationships.

## **Political Activities**

DCS and its employees must act with integrity, transparency, and fairness in all interactions with government authorities, regulatory agencies, and public institutions.

Employees must not engage in political activity during work hours or represent DCS in any political capacity.

While DCS respects employees’ personal political beliefs and activities, the company remains strictly neutral and does not support any political parties, candidates, or organizations through financial or other means.

# Confidentiality

## Information Security and Data Protection

Suppliers must comply with all applicable laws and regulations on confidentiality and information security.

Within the scope of DCS's **Information Security and Data Protection Policy**, partners are expected to take the necessary technical and administrative measures to prevent unauthorized sharing or disclosure of confidential or private information.

Suppliers must not, under any circumstances, disclose, share, or use any information obtained through their business relationship with DCS in an inappropriate manner or for personal gain. The use of internal information for any kind of transaction (including financial gain) is strictly prohibited.

Confidential information and trade secrets protected under confidentiality standards must be stored securely and shared only with authorized employees on a need-to-know basis.

Confidential information may include, but is not limited to, marketing and sales plans, competitive analyses, business strategies, pricing policies, contracts, financial statements, operational processes, or employee data.

## Personal Data Protection

DCS handles the personal data of employees, customers, and business partners with great care and only processes such data in accordance with legal requirements.

Suppliers are responsible for storing and processing personal data in compliance with the Law No. 6698 on the Protection of Personal Data (KVKK) and the EU General Data Protection Regulation (GDPR), ensuring the necessary administrative and technical security measures.

Suppliers must act in line with DCS's Personal Data Protection Policy, treating all personal data lawfully, fairly, and transparently.

Likewise, DCS employees are obliged to ensure that personal data belonging to themselves and others is processed only when necessary and with explicit consent where required.

## Intellectual Property

DCS respects the intellectual property rights of others and expects its business partners to do the same.

Suppliers must never use DCS's or another company's intellectual property, including designs, patents, technology, or other proprietary materials, without proper authorization.

DCS and its suppliers must protect intellectual property with the same level of diligence and ensure that such assets are not copied, shared, or misused in any way.

# Reference Sources

DCS's Third-Party Relations Principles and Rules have been established in line with legal regulations, company policies, and implementation principles, ensuring full compliance with international regulations and standards.

Below are the main sources forming the foundation of these commitments and guidelines:

## Company Policies and Implementation Principles

- Code of Ethics and Business Conduct
- Sustainability Policy and Strategy
- Environmental Policy
- Human Rights Policy
- Ethical Employment Policy
- Child Labor, Forced Labor Prevention, and Youth Employment Policy
- Anti-Discrimination and Anti-Harassment Policy
- Anti-Bribery and Anti-Corruption Policy
- Conflict of Interest Prevention Policy
- Fair Competition Policy
- Occupational Health and Safety Policy
- Information Security and Data Protection Policy
- Personal Data Protection Policy
- Whistleblowing, Consultation, and Non-Retaliation Policy

## International Regulations, Principles, and Policies

- United Nations Global Compact (UNGC)
- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Women's Empowerment Principles (WEPs)
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- ILO Convention No. 182 on the Worst Forms of Child Labour
- OECD Guidelines for Multinational Enterprises
- ISO 37001 Anti-Bribery Management System Standard
- ISO 14001 Environmental Management System Standard
- ISO 45001 Occupational Health and Safety Management System Standard

## Legal Regulations

Suppliers are expected to fully comply with these principles, relevant legal requirements, and international agreements, and must not engage in any behavior, practice, or initiative that contradicts or undermines these standards.

# Reporting Non-Compliance

Any behavior, process, or practice that may be inconsistent with the DCS Third-Party Relations Principles and Rules can be reported without fear of retaliation.

DCS ensures that all reports made under the Code of Ethics and Business Conduct, the Third-Party Relations Principles and Rules, and related policies are handled confidentially, fairly, and promptly under its open-door policy.

Reporting violations is the responsibility of every individual. DCS guarantees that all reports will be treated with confidentiality and fairness under the **Whistleblowing, Consultation and Non-Retaliation Policy**, and that necessary investigations will be conducted in a timely manner.

Suppliers can report their concerns directly to DCS representatives or via email at [etik@dcscustoms.com.tr](mailto:etik@dcscustoms.com.tr).

## SUPPLIER COMMITMENT

We, as a supplier to DCS, hereby commit to fully comply with all requirements of the DCS Third-Party Relations Principles and Rules, as well as the confidentiality and data protection agreements specified in our supply contracts and purchase orders.

We undertake to immediately inform DCS of any actual or potential violations of the above-mentioned principles and rules. We accept DCS's right to take the necessary corrective or disciplinary actions in accordance with its internal policies and standards if we are found to be in breach.

By signing this statement, we also agree to allow DCS or its authorized representatives to conduct audits or investigations when necessary to verify our compliance with these rules and principles.

Place and Date:

Company Name:

Authorized Person – Name, Surname:

Title:

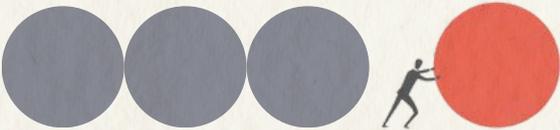
Company Stamp and Signature:

# Revision History

The Third-Party Relations Principles and Rules were established on 09.08.2017 and have been revised on the dates indicated below.

<b>Revision</b>	<b>Date</b>
No1	18.12.2020
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No2	03.11.2025

**DCS**



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