

Labour & Human Rights Policy

INTRODUCTION AND PURPOSE

DTC employees are of great value and the key to our success. The company must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the company.

The purpose of this policy is to define the labour and human rights standards to which all employees in DTC are entitled.

SCOPE

This policy applies to the management, employees and contract workers of all entities in DTC.

REQUIREMENTS

1) Non-discrimination

DTC does not tolerate any form of discrimination against our employees based on race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or other distinguishing characteristics.

Any employment-related decisions, from hiring to termination and retirement, must be based solely on relevant and objective criteria.

2) Freely Chosen Employment

Forced, unfair bonding (including debt bondage) or indentured labour or involuntary prison labour: slavery or trafficking of persons shall not be tolerated. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threats, force, coercion, abduction or fraud for the purposes of exploitation. All work must be contractually agreed work, and worker shall be free to leave work at the legally stipulated/allowed duration. Employees must not be required to surrender any government-issued identification, passports or work permits as a condition of employment. Excessive fees are unacceptable and all fees charges to employees must be disclosed.

3) Child Labour

DTC does not tolerate the hiring of child labour under any circumstances. The minimum age for full-time employment must be 16 or the legal minimum age for employment, whichever is greater. We must not hire workers under the age of 18 for positions requiring hazardous work that could jeopardise health, safety or morals.

4) Freedom of association and collective bargaining

DTC must respect employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.

Employees shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

5) Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees: nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to employees.

6) Working hours, benefits and wages

DTC must adhere to all applicable laws or industry standards, whichever may be more stringent, relating to wages, working hours, overtime and benefits.

Employees must not be required to work more than 60 hours a week, including overtime, on a regular basis (or more than the limits on regular hours and overtime allowed by local laws and regulations). Wages for overtime must be paid in legal tender on a regular basis. Employees shall be allowed at least one day off per seven-day week.

Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees shall be compensated for overtime at pay rates greater than their regular hourly rates. Employee benefits shall follow the local labour laws stipulated. Deduction from wages as a disciplinary measure shall not be permitted. The basis on which employees are being paid is to be provided in a timely manner via pay stub or similar documentation.

In the event of major layoffs, DTC must, as a minimum, satisfy applicable laws and industry standards.

7) Training & development

DTC must be committed to continuously develop employee skills and capabilities, and to provide opportunities for career advancement. All employees must attend minimum 10 hours of training annually.

8) Leave

DTC must ensure that all employees have the right to sick leave and annual holiday, as well as parental leave for employees who have to care for a new-born or newly adopted child as provided by national legislation. Employees who take such leave must not face dismissal or threat of dismissal.

9) Employee Contracts/letter

All employees must be provided with a written, understandable and legally binding employment contract/letter. New confidentiality clause in contract...

10) Healthy and safe workplace

We provide our employees a safe and healthy workplace in compliance with all applicable laws and regulations. The work environment shall always be kept safe, hygiene and promote good health.

11) Privacy

We consider the right to privacy of employees a core value. Employee data is confidential and therefore protected. We also communicate to our employees the importance of confidentiality when dealing with third parties.

12) Supply Chain Management

DTC expects its suppliers to uphold the policies of DTC concerning compliance with all applicable laws, and respect for human rights. They must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in their companies. Refer to Supplier Code of Conduct for more information.

13) Respecting human rights of stakeholders

We will respect human rights of all stakeholders associated with our business activities, including suppliers and customers. We will prevent and reduce indirect adverse influence on human rights of our stakeholders. Should there be any abuse of human rights, DTC will address it immediately and adequately.

14) Promotion of human rights in global markets

DTC strives to comply with the laws and regulations of the countries and regions where our business operations and value chains are based. At the same time, we will operate our business by taking into account the local culture and customs, as well as the environment and society in accordance with the expectations of stakeholders, and take into consideration local human rights issues. DTC will conduct the highly transparent business and contribute toward economic and social development and creation of social values of local communities.

15) Corporate Social Responsibility

DTC World is committed to good causes. We strongly believe in doing good besides doing well. We get involved in events and activities that promote benefits and impacts to the community.

ROLES AND RESPONSIBILITIES

Person in Charge	Roles & Responsibilities
CEO	Responsible for policy approval
Managing Director	Owens, endorses and ensure the implementation of the policy.
General Manager	Responsible for ensuring that this policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. Ensure local compliance with the policy including adequate control measures to eliminate or reduce risks to express behaviours in breach with the policy.
HR Executive	Drives the implementation of the policy, provides specific advice on labour and human rights issues and dilemmas, and ensures that labour and human rights issues are identified and addressed. Audits, reviews, measures and reports on labour and human rights performance.
Management, employees and contract	Comply with the letter and spirit of the policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the policy.

DEVIATIONS

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION

This policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It can be amended with the approval of CEO.