



# dormakaba Code of Conduct

July 1, 2024 | Version: 2.0



# Content

	page		page
<b>A General information</b>	<b>5</b>	<b>C Code of Conduct</b>	<b>14</b>
A.1 Subject matter and purpose	5	<b>WE – What it means</b>	<b>16</b>
A.2 Scope of application	6	C.1 Compliance with the law and internal regulations	16
A.3 Validity	6	C.2 Human rights	18
A.4 Responsibility / contact person	6	C.3 Trust, respect, tolerance	19
A.5 Layout and languages	7	C.4 Health and safety	21
A.6 Communication and implementation	7	<b>ME – What it means</b>	<b>22</b>
<b>B Letter from the CEO, dormakaba Purpose and Behaviors</b>	<b>8</b>	C.5 Conflicts of interest	22
Letter from the CEO	8	C.6 Public relations and confidentiality	24
B.1 dormakaba – Purpose and Behaviors	10	C.7 Responsibility of each employee	27
		C.8 Misconduct and sanctions	28
		<b>US – What it means</b>	<b>30</b>
		C.9 Protection against corruption and bribery	30
		C.10 Fair competition and antitrust law	32
		C.11 Environment	34
		C.12 Supplier Code of Conduct	35
		<b>D Glossary</b>	<b>36</b>
		Shaping a sustainable future	42
		Legal notice	43



# A General information

## A.1 Subject matter and purpose

The dormakaba Code of Conduct (hereinafter also referred to as “the Code” or “the CoC”) is an expression of our company culture and our shared values, to which we are committed worldwide. As a company with a long history, we believe that conducting ourselves in accordance with such values and legal requirements will contribute to our success.

This Code of Conduct includes our dormakaba Purpose and Behaviors and aims at supporting every employee to take appropriate decisions consistent with laws and corporate regulations. It is supported by further rules and regulations.

“One fundament that has to be in place is integrity. That we are a company that can be trusted. That we are not moving into the grey zone of Compliance or where we are challenging or even bypassing the rules and regulations.”

Svein Richard Brandtzæg |  
Chairman of the Board, dormakaba Group

## A.2 Scope of application

The Code of Conduct applies to all our dormakaba employees, regardless of their function or position. The regulations set out in this Code are binding for every dormakaba employee. We regard somebody to be a dormakaba employee when he or she is working in a company of which the majority of shares are directly or indirectly held by dormakaba Holding AG (“dormakaba Group”). The Code of Conduct also applies to temporary employed personnel, if directly employed by dormakaba and the total working period is over six months. This Code addresses “you” when referring to dormakaba employees.

## A.3 Validity

This Code of Conduct came into force on July 1, 2016 and remains valid until further notice. The Board of Directors and the Executive Committee have approved this updated version 2.0, which came into effect on July 1, 2024. It applies throughout the dormakaba Group.

## A.4 Responsibility / contact person

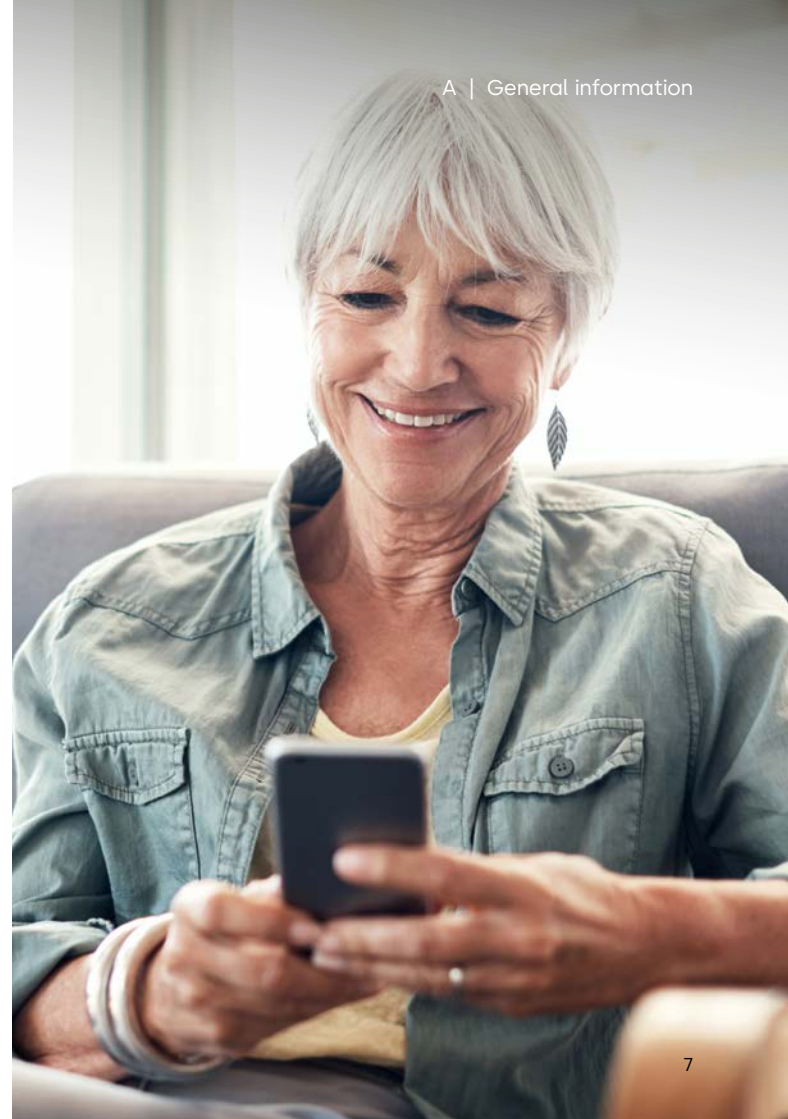
Global Compliance is responsible for the content of the Code of Conduct. All questions relating to its interpretation should be addressed to Global Compliance. If it is unclear whether the Code of Conduct applies, employees should consult their line manager, the Executive Committee member in charge and / or the Compliance Officer.

#### **A.5 Layout and languages**

The Code is available in different languages, on dormakaba Inside.

#### **A.6 Communication and implementation**

Every employee is provided with this Code of Conduct. New employees will receive the Code of Conduct together with their employment contract and are asked to sign a copy confirming that they will comply with the Code at all times. The Code of Conduct is published on dormakaba Inside. All employees will be notified if any major changes are made to the Code. Furthermore, every manager must ensure that their employees are aware of the Code of Conduct, understand it and adhere to it.



## B Letter from the CEO



**Dear dormakaba Colleagues,**

Our culture at dormakaba is shaped by many factors, such as our Purpose, Vision, or our Behaviors. The latter are especially important, as they define how we work together and how we act towards our customers and colleagues. The six

specific Behaviors which we focus on are aligned to and underpinned by a consistently legal and ethical approach in all matters and are of essential importance for our sustainable corporate success, and that is why we are asked to adhere to them regardless of nationality and culture.

The same applies to our dormakaba Code of Conduct, which provides a binding framework for each and every employee in their daily work. Structuring our Code of Conduct, we take different perspectives looking at “we” (dormakaba as a company), “me” (the individual dormakaba employee), and “us” (dormakaba and business partners).

In doing so, our Code of Conduct focuses on twelve essential aspects and contains guidance on how to behave relating to specific areas which are critical to our sustainable corporate success. It provides guidance for everyone from top management down to each individual employee. It places an obligation on us all to act responsibly in our dealings with business partners, customers, and the general



public, as well as our own people within the Group. You can find it on the Global intranet Inside and a copy is given to all new employees to sign upon their arrival.

We each have a responsibility to uphold our company's reputation. Breaching the Code not only damages the company's standing and brand but can also have serious direct legal and financial consequences. Over our long history, we have established an outstanding reputation for ourselves over the past 160 years, and our aim is to maintain and build on this foundation as we move forward. Trust and credibility are built over many years but can be lost in a moment – our Code of Conduct is a vital tool to help us keep on track and uphold the high level of trust placed in us

Therefore, I kindly ask all of you to take the time to read this Code of Conduct carefully and to be guided by it in your daily work. In particular, I ask that you comply with the Code as you apply yourselves to your professional duties and that you deal with any breaches in a spirit of openness and transparency.

Yours sincerely,



Till Reuter  
CEO

## B.1 dormakaba Purpose and Behaviors

**“For every place that matters.”**

This is our Purpose at dormakaba. It's all about why dormakaba exists and contributes to society at a higher level – the reason why we get up in the morning, full of dedication, and serve our customers with energy and passion.

We are where our communities come together. We are in all the places that matter to our life in society. In those places reliable, complex and customer-friendly solutions are required to let our communities lead self-determined lives. We play a crucial role in ensuring safe, secure, sustainable, and seamless access. This is the basis of our aspiration to be our customers' trusted partner for all these places.

The way we work together and how we act towards our customers and colleagues supports us on this journey.



### In short, these are our Behaviors:

- We make things simple for the customer.
- We are courageous and play to win.
- We act as ONE global team.
- We are respectful and communicate openly.
- We develop ourselves.
- We celebrate successes.

The shared six Behaviors make our company unique and bind it closely together, creating a corporate identity that transcends national borders. They provide clarity and a sense of common purpose in our dealings with one another and our stakeholders, thereby enhancing communication.

The dormakaba Purpose and Behaviors together with the Mission, Strategic Pillars and Brand form the dormakaba Big Picture, which displays all key elements of our journey to achieve our Vision.

## Growing the Business

### We make things simple for our customers:



- We want to provide our customers with the best possible experience by delivering to their needs and making them our priority. We use our expertise to find pragmatic solutions tailored to their individual requirements. Their satisfaction is our benchmark: We always give our best, consistently deliver on our promises, and settle issues through collaboration and commitment.



### We are courageous and play to win:

- We want to be the best in our industry. That is why we strive for excellence and continuously improve the way we work. To achieve our goals, we are curious to experiment with new ideas and processes. Our willingness to take initiative means we do not wait for things to happen but deliver customer-centric solutions that help us grow our business.



## Growing together

### We act as ONE global team:



- We can only deliver our best performance when we act as a team, supporting each other. Our expertise, our strengths, and our diversity contribute to our success. By working together across departments and borders, we grow stronger and more powerful every day and win as a team.

### We are respectful and communicate openly:



- We treat each other in a fair and honest way and invite the sharing of experiences and opinions. We enable an atmosphere of trust and appreciation by communicating openly and focusing on finding solutions. We value and respect one another and show empathy and understanding for others' situations and opinions.

## Growing ourselves

### We develop ourselves:



- We aspire to grow every day by seeking opportunities to learn. Giving and receiving constructive feedback and support provides us with the chance to better ourselves and to advance on our career path. We do not judge but treat mistakes or setbacks as a possibility to reflect on ourselves and to improve our skills.

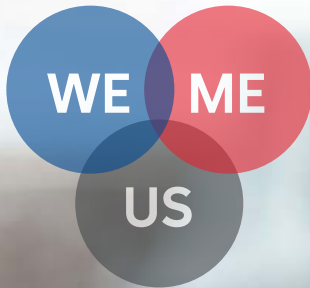
### We celebrate successes:



- We take the time to appreciate what we have achieved. We are proud of what we do, celebrate a job well done, and share our learnings with others, helping us grow as people, as a team, and as a company.

# C Code of Conduct

Structuring our Code of Conduct, we considered different perspectives and named the respective parts of our Code accordingly: What do you have to know from a WE perspective, from a ME viewpoint, and from a US point of view? But first of all, whom exactly do we mean by **WE**, **ME**, and **US**?





## WE

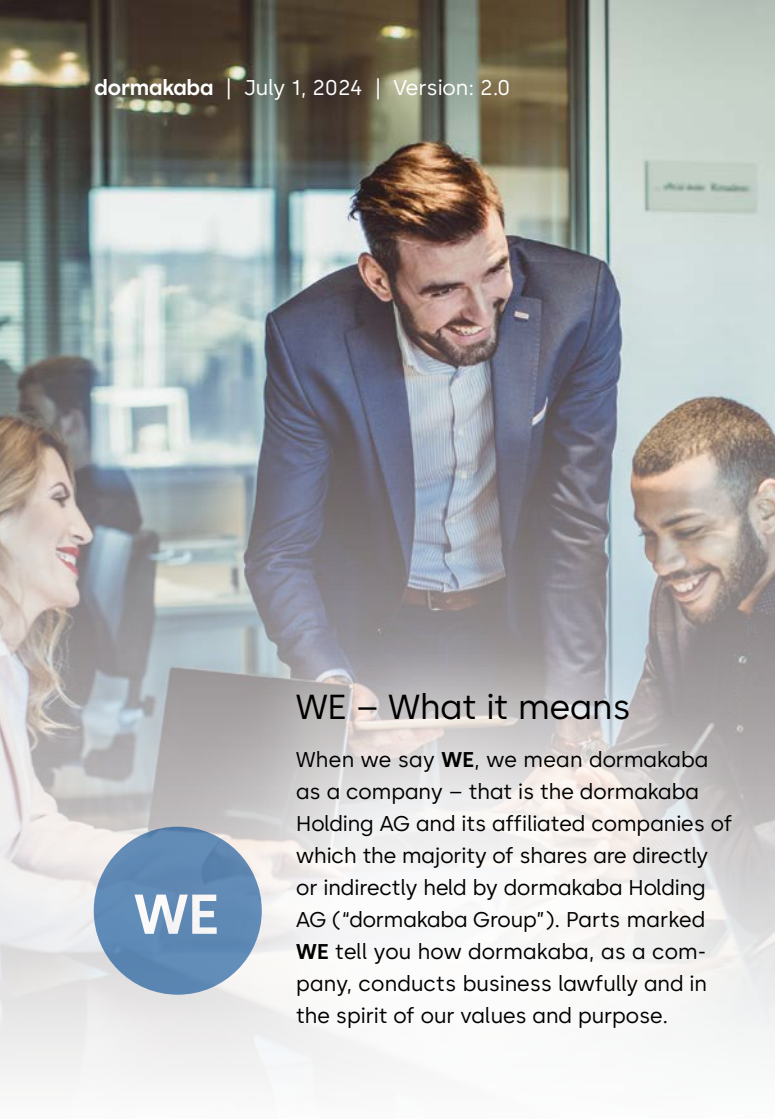
When we say **WE**, we mean dormakaba as a company – that is dormakaba Holding AG and its affiliated companies of which the majority of shares are directly or indirectly held by dormakaba Holding AG (“dormakaba Group”). Parts marked **WE** tell you how dormakaba, as a company, conducts business lawfully and in the spirit of our values and purpose.

## ME

When we say **ME**, we mean the individual: each and every one of dormakaba's full- and part-time employees and temporary staff at all our business locations around the world. Parts marked **ME** tell you how you, as an individual, are responsible for behaving with integrity, regardless of your role.

## US

Speaking of **US**, we mean dormakaba and its business partners, customers, sub-contractors and suppliers, shareholders, communities, governments, and other stakeholders. Parts marked **US** tell you how we have to act within our working environment.



## WE – What it means

When we say **WE**, we mean dormakaba as a company – that is the dormakaba Holding AG and its affiliated companies of which the majority of shares are directly or indirectly held by dormakaba Holding AG (“dormakaba Group”). Parts marked **WE** tell you how dormakaba, as a company, conducts business lawfully and in the spirit of our values and purpose.

**WE**

## C.1 Compliance with the law and internal regulations

Given that we are a company with operations in over 50 countries around the world, it is a matter of course for us to comply with applicable law and legal regulations at the local, national and international level. Compliance with laws and regulations is a key factor for the sustainable success of our business.

Besides complying with applicable law and legal regulations, you, as an employee of dormakaba, are expected to internalize the dormakaba Big Picture, the company Behaviors and the further ethical and moral requirements of this Code of Conduct. The Code of Conduct sets a mandatory minimum standard within the overall organization and provides guidance of the highest standing. Individual chapters may be supplemented by dormakaba rules and regulations.



If compliance with the CoC or underlying rules and regulations would lead to a breach of statutory regulations, the latter take precedence. Global Compliance must be informed of any and all such conflicts.

If you are a manager, you are expected to acquire a basic knowledge of applicable law and the corporate regulatory framework in your area of responsibility.

Finally, while dormakaba feels strongly committed to the values and content defined in this Code of Conduct, it shall also respect local customs and cultures.



## C.2 Human rights

We support and respect internationally proclaimed human rights and labor standards, including the “UN Universal Declaration of Human Rights” and the ILO Declaration on “Fundamental Principles and Rights at Work.” We recognize that responsible employment and recruitment are critical to protecting workers and their human rights, and we are committed to protecting all workers from any form of abuse or exploitation, paying special attention to the rights of more vulnerable workers.

This especially includes our commitment to eliminate all forms of forced and compulsory labor, and to abolish child labor from our value chain. You can find more information about our commitment in our Directive Responsible Labor and our Directive Zero Recruitment Fees.

“dormakaba respects human rights everywhere – as all human beings are born free and equal in dignity and rights.”

Stephanie Ossenbach | Group Sustainability Officer

We are committed to Diversity, Equity and Inclusion. We take action to ensure equal opportunity for all applicants and employees without regard to age, race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status, or other legally protected characteristics.

We conduct annual human rights due diligence to proactively assess, identify, prevent, and mitigate actual and potential adverse human rights impacts on rightsholders across our value chain as outlined in the dormakaba Statement of Commitment on Human Rights. Additionally, we commit to providing rightsholders with access to grievance mechanisms and access to remedy.

## C.3 Trust, respect, tolerance

We treat others as we expect to be treated by them.

We trust in our own abilities and will always act with integrity and transparency. We try to understand and respect our counterpart's values and requirements by adopting a benevolent attitude. We do what we say. Knowing that accountability cannot be delegated, we strive to delegate responsibility to the lowest reasonable level in order to empower and encourage decision-makers to take reasoned and effective decisions.

**"With this Code of Conduct we strive to empower and encourage all decision-makers to take reasoned and effective decisions."**

Michael Vorhold | Group Compliance Officer

We value respect, politeness, and tolerance. dormakaba aims to offer an attractive work environment to all of you where you can develop your talents and fulfill your potential. As we strive to foster excellence in each individual, you as an employee are entitled to fair, respectful, and dignified treatment. We do not tolerate any kind of discrimination, neither within the company nor related to any customer, contractor, or supplier. Similarly, we reject any form of harassment, bullying, or intimidation.

We operate fully within established company guidelines, and we adhere to and respect the equality of people and cultures, ethics, morals, and legal standards within the markets that we serve and operate in.



## C.4 Health and safety

The health and safety of our employees is at the heart of everything that we do. Our people are our number one asset, and we at dormakaba are committed to ensuring a safe working environment both physically and mentally for all of our employees.

dormakaba is ingraining a culture of health and safety to protect our people. We aim to identify and eliminate workplace hazards through proactive safety reporting methods, adequate job hazard analysis, engineering controls, and adequate safety training programs. All our team members are provided adequate personal protective equipment for their respective job duties, as well as visitors and contractors within our sites.

**“We are committed to fostering a working environment where our team members can learn, grow, perform, and most importantly, return home to their families and loved ones safe and healthy.”**

Katie Henry | VP Quality, HSE & Change Management

Finally, to increase transparency and monitor the safety performance across our sites, we encourage every employee to bring forth their health and safety observations, near misses and incidents, and address these within a timely manner. We ensure adequate implementation of corrective action and leverage global read across to ensure every site benefits from the corrective actions, not just the impacted facility.



## ME – What it means

When we say **ME**, we mean the individual: each and every one of dormakaba's full- and part-time employees and temporary staff at all our business locations around the world. Parts marked **ME** tell you how you, as an individual, are responsible for behaving with integrity, regardless of your role.

## C.5 Conflicts of interest

A "conflict of interest" occurs when your interest interferes, or even appears to interfere, in any way with the interests of dormakaba. Such situations should be avoided, or if unavoidable, resolved in the best interests of dormakaba.

If you are, or appear to be, in a conflict of interest, you must make this situation transparent by informing your direct manager, a higher-level manager, or, if there is a problem with that route, your Human Resources representative or the Compliance Officer so that an appropriate response can be determined. Having reported to one of the above-mentioned representatives, you and the representative will develop a viable approach to deal with the conflict. Please resolve such matters through proactive intervention, for example by finding someone else to deal with the business in question. The result of the consultation between you and the respective representative must be minuted in summary form and submitted to the Compliance Officer.

**Conflicts of interest may occur in, but are not limited to, the following cases:**

1. Conflicts arising from your knowledge as an insider (prohibition of insider dealings). For more details, please refer to the Directive Insider Trading.
2. You have, or a member of your family or a close personal relation of you has, a direct or indirect ownership interest or other significant financial interest in, or obligation to, an actual or potential competitor, supplier or customer of dormakaba.
3. You are or will be working closely together with a member of your family or someone with a close personal relationship.
4. You or a member of your family, or a close personal relation directly or indirectly accepted benefits of significant value and now are in the position of giving something in return (e.g., signing a new contract, agreeing to new conditions). For more details, please refer to the Group Directive Anti-Corruption and Bribery.
5. You are buying from or selling to family members or close personal friends.
6. You are engaged in or wish to enter into secondary employment. Depending on extent and nature of this employment, a conflict of interest could occur. For more details, please contact your local HR department.

### How to handle a (presumed) conflict of interest



**Make it transparent:**

1. Inform your direct manager about the conflict of interest or (if not possible)
2. Inform HR / Group Compliance
3. Develop a viable approach to deal with the conflict together with your direct manager (or HR, or Group Compliance)
4. Minute the results of the consultation and submit the minutes to Group Compliance



## C.6 Public relations and confidentiality

We keep sensitive information confidential and seek approval as described below before we communicate with the media.

We handle confidential information with care. No sensitive information or material may be disclosed to unauthorized persons, be they third parties or other dormakaba employees. This also applies after the termination of your employment.

Before confidential information is given to third parties (e.g., consultants, freelancers, due diligence lawyers), a non-disclosure agreement must be signed by the recipient. During telephone calls in public, the information disclosure level must be kept to a minimum, avoiding the mentioning of names of persons or companies, projects, product descriptions, figures and any other sensitive information.



Media requests for interviews, statements or articles may only be answered after consultation with Global Communications & Brand – External Communications. Any visit of media companies to dormakaba sites and facilities must be announced in advance and authorized by Global Communications & Brand. Access to dormakaba sites shall be refused to employees of radio or television stations, newspapers or magazines who arrive without invitation or prior notice.

When you present facts and figures about dormakaba in public (e.g., at seminars, conferences and trade fairs), slideshows or documents may only disclose information that is publicly available on our external website or in official company brochures and other information material.

Finally, we are aware that, as a stock listed company, dormakaba is obliged to comply with the legal provisions stipulated by the Swiss stock exchange (SIX Swiss Exchange). This includes Article 53 of the Listing Rules ("LR") and the Directive ("DAH") issued under that rule on ad hoc publicity. The aim of the ad hoc publicity provisions is to ensure that all current and potential market participants have equal opportunity to access potentially price-sensitive information (ad hoc publicity). This is meant to ensure maximum transparency and equal treatment of market participants.

Further information can be found in the Group Directive "Ad hoc" and the Directive Media / Public Relations and Marketing Communications.



## C.7 Responsibility of each employee

You are expected to read and understand the dormakaba Code of Conduct. Furthermore, you are expected to comply with the Code both in letter and in spirit.

Personal integrity is the core qualification we require. By complying with applicable legal regulations, you are acting in the interest of dormakaba, even if management staff gives instructions to the contrary.

**“Integrity and Compliance are ingrained in our corporate culture. It's part of a bigger culture and mindset around doing the right thing and acting in a responsible manner.”**

René Peter | CFO dormakaba Group

We are aware that we are representatives of dormakaba and will be recognized by our actions as such. By following our values and the Code of Conduct, we will help ensure that dormakaba continues to be seen in a positive light.

Finally, if you are a manager, you bear a special responsibility. You are a role model and shall encourage your employees to act in compliance with this CoC. Every line manager bears a responsibility for the employees who are entrusted to them. Managers are expected to lead according to dormakaba standards of ethical conduct and to demonstrate their commitment to the Code of Conduct.

## C.8 Misconduct and sanctions

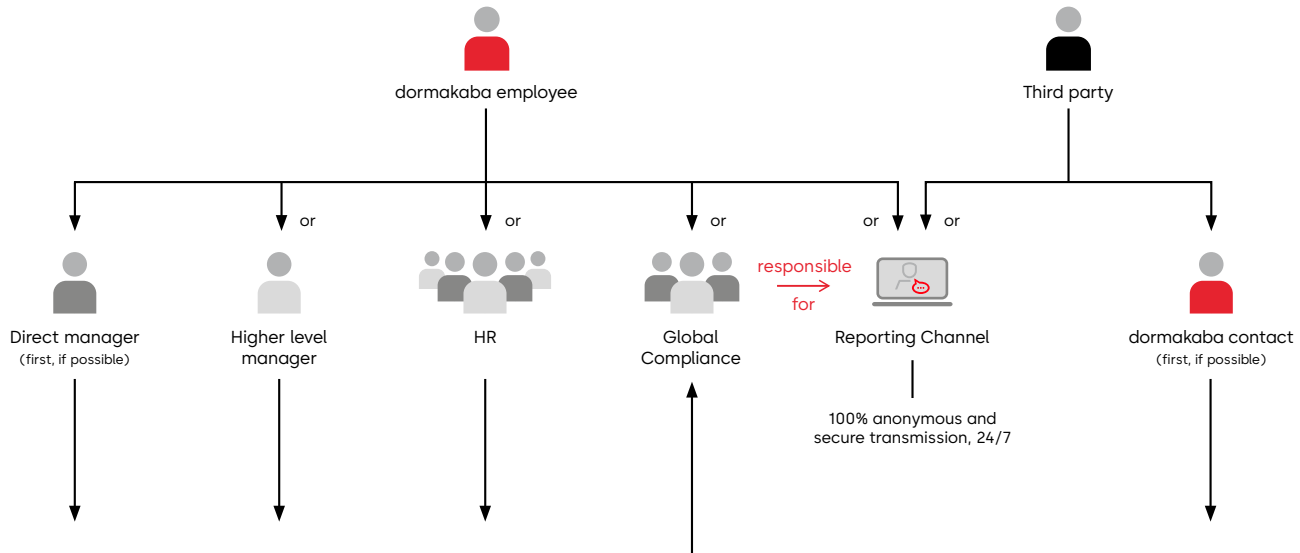
The provisions included in this Code of Conduct reflect the core values established at and for dormakaba. They set out a minimum standard that has to be maintained. All cases where these core requirements are not satisfied or appear to have been contravened must be reported. Regardless of whether you yourself are affected or whether you observe other employees breaching this Code – a report has to be filed.


The person reported to (generally your direct manager) will decide on the appropriate action. In case of doubt, advice may be sought from a higher line manager or Global Compliance. The recipient of such a report must inform the Compliance Officer / Global Compliance about all proven breaches of this Code of Conduct directly. The report recipient must also send a list of all countermeasures taken to the Compliance Officer / Global Compliance no later than six months after the breach was initially reported.

In addition to the aforementioned reporting process, dormakaba also offers an anonymous, publicly accessible reporting channel on its website, which can be used by all employees, as well as third parties, to report possible compliance incidents.


Confidentiality is maintained to the fullest extent practicable. All reports are investigated and the person raising the issue will receive feedback. Retaliation or victimization of any employee who reports a concern in good faith will not be tolerated and will itself be subject to disciplinary action. The same applies to any abuse of these reporting processes.


We will not hesitate to take action against any employee should they violate governing law or this Code of Conduct. Misconduct may lead to severe sanctions, including termination of employment. Legal sanctions may also ensue, including monetary fines or civil or criminal prosecution in particularly serious cases.




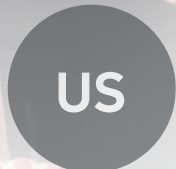
 **Global Compliance**

- information about proven breaches (immediately)
- list of countermeasures (within six months)

 Confidentiality to the fullest extent practicable

 All reports will be thoroughly investigated

 Person raising the issue will receive feedback if requested



## US – What it means

Speaking of **US**, we mean dormakaba and its business partners, customers, sub-contractors and suppliers, shareholders, communities, governments, and other stakeholders. Parts marked **US** tell you how we have to act within our working environment.

## C.9 Protection against corruption and bribery

Corruption is contrary to fair competition and harms the company's economic standing and reputation. By standing up to and rejecting corruption in all its forms, we protect our reputation and secure the basis for future business.

We adhere to legal requirements and, therefore, no kind of corruption is tolerated. All illegal benefits to third parties, whether directly or indirectly, to public authorities or in the private business sector, are prohibited. The same applies to receiving such benefits. Facilitation payments are also forbidden.

**Generally, the giving and granting of benefits is only allowed if the following principles are followed:**

- Social Adequacy Principle
- Transparency Principle
- Principle of Separation
- Documentation Principle
- Approval

If a benefit is to be granted to an employee of a business partner or a public authority, this benefit has to be socially adequate according to local standards and customs (Social Adequacy Principle). According to the Principle of Separation, any (even apparent) connection between granting / receiving the benefit and a business decision must be avoided. If you fulfill the above-mentioned principles, you might grant / receive a benefit when acting within the private business sector. In contrast, benefits to public authorities must be handled very restrictively.

Depending on the kind of benefit being granted / received (e.g., entertainment, travel, gift, meal), its business relation (plant visit, closing dinner), and its value, you will have to obtain prior approval from a direct manager and / or the Compliance Officer. The rules and assessment criteria of this section of the Code of Conduct and the Group Directive Anti-corruption and Bribery may not be circumvented, for example by private invitation, through donations or sponsorships or by involving third parties. For more details, please refer to the Group Directive Anti-corruption and Bribery or consult the Compliance Officer.



## C.10 Fair competition and antitrust law

dormakaba aims to be a trusted global partner and believes our customers' interests are best served by strict adherence to all applicable laws. In this respect, we support a free market and regard fair competition as the best basis for our own growth and corporate success.

We are aware that operations conducted in different countries bring employees into contact with antitrust laws of jurisdictions other than, and in addition to, those of their own country. Even though the purpose of competition law – to protect the competitive market system – seems to be quite simple, antitrust and fair competition law is a complex matter. You should never hesitate to contact Global Legal in the event of queries or when in need for advice. Further detailed information is provided in the Group Directive Antitrust.

Notwithstanding the above, you must be aware of the following antitrust basics and minimum requirements:

A distinction is to be made between unilateral conduct and bilateral agreements (horizontal and vertical agreements). Unilateral conduct, in particular, forbids the abuse of a dominant market position. Within bilateral agreements, antitrust law intends to protect competition by prohibiting all agreements between two or more companies, decisions by associations of companies and concerted practices which restrict competition.

To protect yourself and dormakaba from the consequences of an infringement of antitrust laws, especially the all of the following actions are forbidden (non-exhaustive list):



**Unilateral conduct (if applicable):**

- charging unreasonably high prices
- depriving smaller competitors of customers by selling at artificially low prices they cannot compete with
- obstructing competitors in the marketplace (or in another related market) by forcing consumers to buy a product which is artificially related to a more popular, in-demand product
- refusing to deal with certain customers or offering special discounts to customers who buy all or most of their supplies from the dominant company
- making the sale of one product conditional on the sale of another product

**Bilateral conduct:****Horizontal agreements between competitors**

- Cartels: Price fixing, market and customer sharing
- Exchange of information

**Vertical agreements within the supply chain**

- Resale price maintenance
- Resale restrictions (regions, customers)
- Online sale restrictions

**Special topic: sensitive information (including in association meetings)**

- Sharing market-relevant information that can reduce the risk of “secret competition” between companies, e.g.:
  - Quantities, turnover, sales figures
  - Current prices, price elements (e.g., discounts), terms and conditions of sale and payment terms
  - Contemplated price increases, development of gross margins
  - Costs, capacities
  - Investments and market strategies
  - Marketing plans
  - Customer lists, results of customer meetings
  - Business risks
- As a rule of thumb, any information that you would want from your competitors for your own business and would not, in turn, provide to them can be presumed to be sensitive information.

## C.11 Environment

The environment builds the natural living conditions of all beings. We recognize that environmental responsibility is integral to producing world-class products. In manufacturing operations, we strive to minimize adverse effects on the community, environment, and natural resources to safeguard the health and safety of the public. As outlined in the Directive Environment, we are committed to improving our management of environmentally related processes, monitoring and reducing our energy consumption, carbon emissions, and water consumption, and increasing our recycling rates. Adopting a life-cycle perspective, we continually aim at improving the environmental performance of our products and services while increasing material efficiency and adhering to materials restrictions regulations.

**"The environmental protection and acting sustainably is not only a great value in itself. It is also important for dormakaba to remain competitive in the years to come."**

Stephanie Ossenbach | Group Sustainability Officer

dormakaba encourages its employees to contribute to sustainable development along the entire value chain in line with our economic, environmental, and social responsibilities toward current and future generations. We seek an open, transparent dialogue with stakeholders to define strategies and actions based on clear targets and continuous improvement, while actively reporting on progress. All employees should be familiar with the Sustainability Charter, which establishes the sustainability governance and organization framework required for successfully achieving the

company's vision in regard to sustainability. It embeds the principles of corporate responsibility and sustainability into the business and defines the responsibilities for delivering on related goals at global, regional, and local levels. This approach allows us to walk the talk, sustainably create value, and earn the continued trust of dormakaba stakeholders.

## C.12 Supplier Code of Conduct

We are committed to leveraging our purchasing power to benefit those partners whose values align most closely with the standards this Code of Conduct sets, and to make more sustainable choices in the goods that we procure.

### **We are committed to:**

- Prioritizing suppliers who have embedded sustainable and ethical practices within their organization and who drive such practices within their own supply chain
- Identifying areas of higher risk and influence within our supply chain and engaging with suppliers, discontinuing business relationships with those suppliers that choose not to engage, and providing training and development support for those that do
- Selecting environmentally preferable goods and materials to the maximum extent possible

Our expectations in this regard are detailed in the Directive Sustainable Procurement. Suppliers are subject to contractual obligations to meet these expectations which are laid out in the Supplier Code of Conduct, the Sustainability Agreement, and special Terms and Conditions for Labor Agents and Contractors.

## D Glossary

Term	Explanation
Ad hoc publicity	<p>As a stock listed company, dormakaba is obliged to comply with the regulations stipulated by the SIX Swiss Exchange. This includes Article 53 of the Listing Rules (“LR”) and the Directive (“DAH”) issued under that rule on ad hoc publicity. The aim of the ad hoc publicity provisions is to ensure that all current and potential market participants have equal opportunity to access potentially price-sensitive information (ad hoc publicity). This should ensure maximum transparency and equal treatment of market participants.</p> <p>For more details, please refer to the Group Directive “Ad hoc” within “dormakaba Rules &amp; Regulations”.</p>
Harassment	<p>The act of systematic and / or continued unwanted and annoying actions of one party or a group, including threats and demands.</p>
Bribery	<p>The offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official or other person in the discharge of their duties.</p>
Directives	<p>A directive is a formal and mandatory executive order or official decision on a procedure. It describes a fixed, step-by-step sequence of activities which must be followed.</p>

Term	Explanation
Discrimination	Treating a person or particular group of people differently, especially in a worse manner than others are treated, because of their skin color, sex, sexuality, etc.
Facilitation payment	A small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement.
Fair competition	Competition deemed reasonable in view of the interests of those competing and the public and not involving practices condemned by law as harmful to the public interest. By contrast, unfair competition is competition based on the abuse of near-monopoly powers, predatory pricing, etc.
Group Directives	A Group Directive (GD) is a set of basic rules by which the organization is guided. GDs supplement the CoC by disclosing more detail and providing further instructions. GDs are not limited to one specific task or working group and will generally address a majority of the employees.

Term	Explanation
Insider	Please refer to the "Directive Insider Trading".
International Labor Organization	The International Labor Organization (ILO) is devoted to promoting social justice and internationally recognized human and labor rights, pursuing its founding mission that social justice is essential for universal and lasting peace. <a href="http://www.ilo.org/global/lang--en/index.htm">http://www.ilo.org/global/lang--en/index.htm</a>
Corruption	Corruption is the abuse of entrusted power for private gain.
Human Rights	Human rights are rights inherent to all human beings, irrespective of nationality, place of residence, sex, national or ethnic origin, skin color, religion, language or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Term	Explanation
Bullying	<p>Bullying is an intentional act that causes harm to others, and may involve verbal harassment, verbal or non-verbal threats, physical assault, stalking, or other methods of coercion, such as manipulation, blackmail, or extortion. It is aggressive behavior that intends to cause fear, distress or harm to another person's body, emotions, self-esteem or reputation. An imbalance of power between the aggressor and the victim is often involved. Bullying can also occur in groups (group bullying).</p>
Sustainability	<p>Sustainability consists of fulfilling the needs of current generations without compromising the needs of future generations, while ensuring a balance between economic growth, environmental care and social well-being.</p>

Term	Explanation
Public sector	The government and its decentralized units and agencies — including the police, military, public roads and transport authorities, schools and the public healthcare system — that use public funds and provide services based on the motivation to improve citizens' lives rather than to make a profit.
Rules and Regulations	Umbrella term for Code of Conduct, Group Directives, Directives and Other Rules within the dormakaba regulatory framework.
Stakeholder	A stakeholder is anyone with an interest in, or claims on, an undertaking. These can be internal or external persons who are affected, directly or indirectly, by the present or future activities of the undertaking in question. In keeping with the stakeholder approach, such persons have a right – similar to that of shareholders (owners / proprietors) – to represent, defend and assert their interests vis-à-vis said undertaking.



Term	Explanation
Transparency	Characteristic of governments, companies and individuals that involves openly and honestly disclosing information, rules, plans, processes, and actions. Essentially, corporate management and Board members have a duty to act visibly, predictably and understandably to promote participation and accountability and to enable third parties to easily recognize what actions are being undertaken and why.
UN Global Compact	A voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals. <a href="https://www.unglobalcompact.org/">https://www.unglobalcompact.org/</a>
Confidential information	Information which is only intended for certain, specially selected persons. dormakaba has a number of Directives concerning confidential information. These include our Ad hoc, Information Security, Insider Trading and Antitrust Directives. Please refer to those directives for further information.

# Shaping a sustainable future

**We put sustainability at the core of our vision, which underlines our long-term commitment to shaping a more sustainable industry and future.**

In our new sustainability framework we focus on three Pillars: People, Planet, and Partnerships. These are supported by over 30 concrete targets

**People: We empower our people so that they can unlock their full potential.**

We create a fair, inclusive, and safe culture which enables our employees to thrive. We provide a workplace where they can continuously grow, openly contribute with their ideas, and feel proud of their achievements.

**Planet: We open the doors wide to a low-carbon and circular economy.**

We develop innovative and resource-efficient solutions for the circular economy and do our part to ensure a climate-resilient future. We offer durable and energy-efficient products that help our customers achieve their own sustainability goals.

**Partnerships: We collaborate to promote sustainable development beyond our own doors.**

We lead by example and engage with our partners to drive more eco-friendly practices and support the protection of human rights. Through our secure access solutions, we also contribute to people's health and safety. We work with partners to raise awareness on safe operating practices of our products.

**CHF 2.8 billion**  
turnover in 2022/23

**130 countries**  
served with global partners

**160 years**  
of experience

**16,000 employees**  
worldwide **1,800 + patents**  
driving innovation

## Legal notice

### **Publisher**

dormakaba  
International Holding AG,  
Rümlang (Switzerland)  
[www.dormakabagroup.com](http://www.dormakabagroup.com)

### **Editor**

dormakaba,  
Global Compliance

### **Design and Layout**

ORT Medienverbund GmbH  
[www.ort-online.net](http://www.ort-online.net)

EN, 07/2024  
Subject to technical modifications



[dormakabagroup.com](https://dormakabagroup.com)

**dormakaba**  
**International Holding AG**  
Hofwissenstrasse 24  
CH-8153 Rümlang  
T +41 44 818 90 11  
[info@dormakaba.com](mailto:info@dormakaba.com)  
**[dormakabagroup.com](https://dormakabagroup.com)**