

Modern Slavery and Child Labor Statement

Table of contents

02	Objective
03	A. Highlights
03	B. About dormakaba
06	C. Human rights due diligence
06	C.1 Policies
10	C.2 Impact assessment
12	C.3 Responsibility and resources allocation
12	C.4 Prevention and mitigation
18	C.5 Access to remedy
20	C.6 Training
22	C.7 Tracking of performance
23	C.8 Communication of performance
23	C.9 Engagement with stakeholders
23	C.10 Grievance mechanism
24	D. Approval
24	Attestation

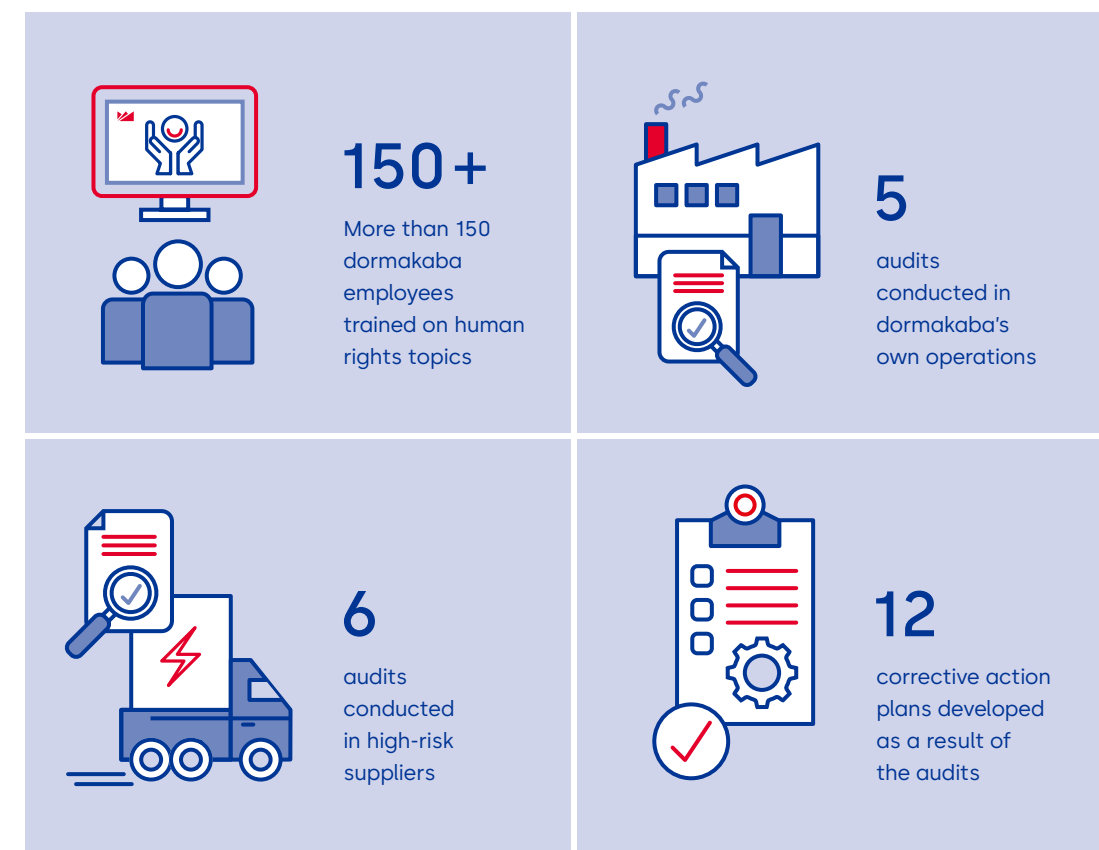
Objective

This Statement responds to the regulations on business and human rights being enacted in numerous countries, such as Switzerland, Canada, Australia, the Netherlands and the United Kingdom. Our document describes what we have done to ensure that modern slavery, in particular child labor and forced labor, are not taking place in our supply chains or in any part of our businesses.

We understand the importance of these regulatory changes and welcome their approach to eradicating forced, compulsory, and child labor from all

areas of life. We also acknowledge our responsibility to respect human rights in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Further, as our Statement of Commitment on Human Rights states, we are fully committed to upholding the UNGPs and keeping to our Group Directives covering human rights.

A. Highlights



B. About dormakaba

B.1 Activities

dormakaba Group ("we" or "dormakaba") is a leading provider in the access solutions market. We offer customers a broad, innovative portfolio of products, solutions, and services that easily fit into building ecosystems. We clearly split our global core businesses into Access Automation Solutions (door operators, sliding doors, and revolving doors); Access Control Solutions (connected devices and engineered solutions); Access Hardware Solutions (door closers, exit devices, and mechanical key systems); and Services. We are also a market leader for Key Systems (key blanks, key cutting machines, and automotive solutions such as transponder

keys and programmers), as well as Movable Walls, including acoustic movable partitions and horizontal and vertical partitioning systems.

We have a long tradition of innovation and engineering expertise. We strive to be an innovation leader that anticipates and fulfills customer needs through continual technological advancement, creating state-of-the-art solutions that add value for customers and end users alike. We are active in about 130 countries and are present in all relevant markets through production sites, distribution and service offices, and collaboration with local partners.



B.2 Structure

dormakaba Holding AG is the parent company of dormakaba Group, which was formed by the merger on 1 September 2015 of two unaffiliated enterprises: the family-owned German company Dorma Holding and the Swiss Kaba Group. After the merger, dormakaba Holding AG owns 52.5% of dormakaba Holding GmbH + Co. KGaA, an intermediate holding company that comprises all the Group's operating entities and is fully consolidated in the financial statements prepared by the parent company. Minority interests are shown separately as part of equity capital.

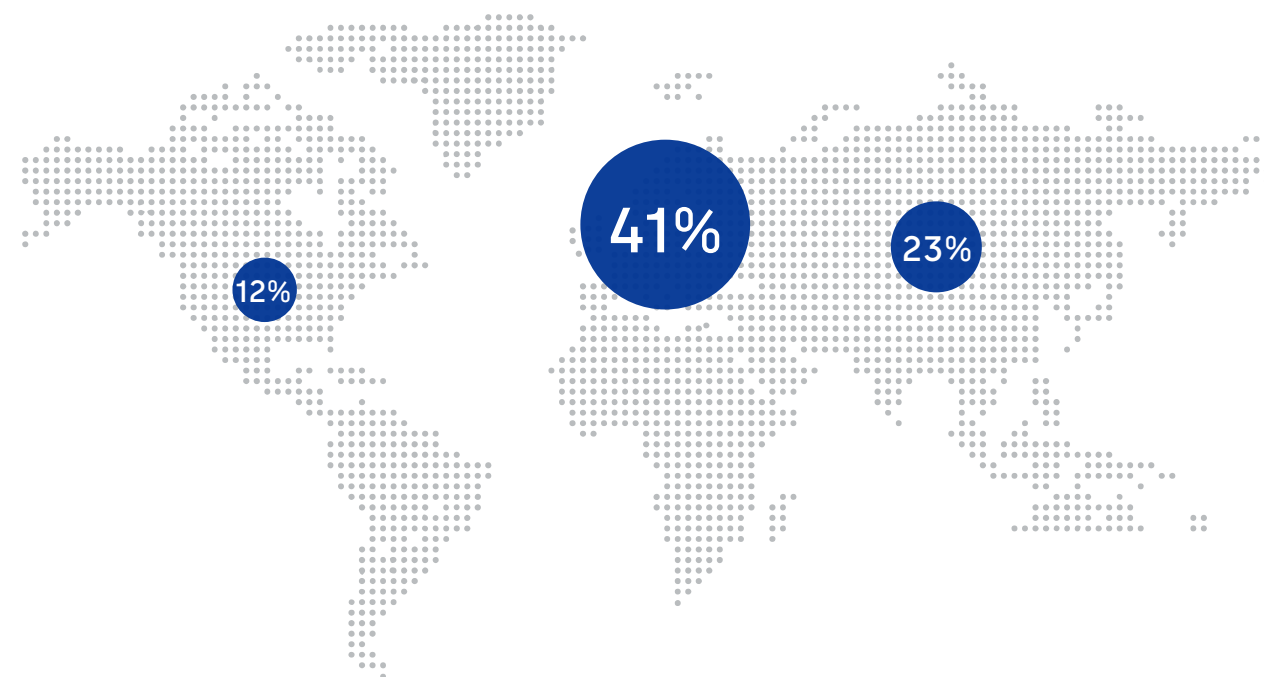
As at 30 June 2025, the total workforce in the scope of this report consisted of 15,967 employees, based on headcount. 44.9% of the employees in this scope are covered by collective bargaining agreements. In addition, dormakaba engaged 328 apprentices, trainees, and interns, and employed 1,749 contract workers at the sites in scope.

B.3 Supply chain

Our global supply chain is large and complex, which poses a challenge in terms of sustainability management. Our global procurement volume with external vendors corresponds to about 49% of total net sales. The number of active suppliers for goods and services is approximately 12,300, with spend focused in Europe (41%), Asia (23%), and the Americas (12%). The most used raw material types include brass, zinc, aluminum, nickel silver, high-alloy special steels, and glass. Indirect spending is mainly on capital goods and services.

In the FY 24/25, we continued our efforts to consolidate and reduce the supplier base in order to leverage synergies, build strong supplier relationships, and support better due diligence.

12,300 active suppliers



Most used raw material types



brass



zinc



aluminium



nickel
silver



high-alloy
special steels



glass

C. Human rights due diligence

The UNGPs is the framework that underpins our Human Rights Due Diligence Strategy.

We have found that forced and compulsory labor as well as child labor are salient issues for us.

C.1 Policies



C.1.1 dormakaba Code of Conduct

Our core values and principles are defined in the dormakaba Code of Conduct. The Code also contains rules and requirements on human rights and forced, compulsory, and child labor, as well as compliance with all applicable laws and legal regulations. The following sections are the most relevant to these topics:

Section C.1: Compliance with the law and internal regulations
Section C.2: Human rights
Section C.3: Trust, respect and tolerance
Section C.4: Health and safety
Section C.12: Supplier code of conduct



C.1.2 dormakaba Statement of Commitment on Human Rights

In line with the "Protect, Respect, Remedy" framework provided by the UNGPs, we recognize our role in supporting and respecting the human rights of all people, as stated in the dormakaba Code of Conduct. The Statement of Commitment introduces a proactive approach to human rights risk management for the Group that underpins all our business activities and partnerships.

The Statement of Commitment clarifies: the relevant international human rights frameworks we subscribe to; our salient human rights issues; our Human Rights Due Diligence Strategy describing the appropriate policies and processes that implement our human rights commitment.

The Statement also pledges adherence to prominent international human rights frameworks, such as the Universal Declaration of Human Rights (UDHR); the International Covenant on Civil and Political Rights; the International

Covenant on Economic, Social and Cultural Rights; the Core Conventions of the International Labour Organization (ILO); and the OECD Guidelines for Multinational Enterprises.

The Statement was one of the major outcomes of the Human Rights Saliency Assessment we undertook in 2019. It encompasses the perspectives of more than 20 internal and external stakeholders and experts consulted before it was drafted. Among the broader human rights issues identified, we commit to focusing on the following salient human rights issues (in alphabetical order): child labor, contributing to conflict, customer safety, environmental issues impacting human rights, migrant workers (forced labor), outsourced services and occupational health and safety. The commitments apply to the whole Group. Should there be conflicts with local standards, the stricter rule applies.

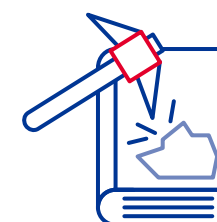


C.1.3 dormakaba Supplier Code of Conduct

We are committed to leveraging our purchasing power to the benefit of those partners and suppliers that align most closely with our values and sustainability goals. The dormakaba Supplier Code of Conduct (SCoC) sets out our requirements on human rights, fair working conditions, environmental responsibility, and business ethics that suppliers and business partners must uphold if they wish to do business with us or any of our

controlled entities. In addition, the SCoC includes a pass-on-clause that requires suppliers to cascade our requirements down their own supply chains.

The SCoC is integrated in the online supplier onboarding and bidding systems. It is also part of the new standard contracts. We created a user-friendly, explanatory document to help us communicate the Code to our supplier base.



C.1.4 dormakaba Statement of Commitment on Responsible Minerals Sourcing

As a company procuring electronic components, we acknowledge our responsibility to take action to increase transparency in our mineral supply chains, in particular regarding potential human rights violations during the mining of certain minerals. This is why, during the FY 2023 / 2024, we adopted the Statement of Commitment on Responsible Minerals Sourcing to provide our entities with the framework they need to source responsibly from conflict-affected and high-risk areas, while creating the enabling conditions

for constructive engagement with suppliers. The document lays out our commitments on responsible sourcing of minerals, the main elements of our due diligence policy, and the obligations of suppliers of products or materials that contain conflict minerals or cobalt. In FY 2024 / 25, we reviewed the Statement to assess the need to update it to ensure compliance with Regulation (EU) 2023 / 1542 on the marketing of batteries and waste batteries.



C.1.5 Group Directive Sustainable Procurement

In the FY 2022 / 23, we adopted the Sustainable Procurement Directive. The Directive formalizes the processes and systems we have long set for ensuring the sustainable management of our supply chain. Prominent examples are the supplier preference system, the sustainability contractual agreements, the sustainable purchasing factors, and the escalation process for cases of non-participation or non-compliance. The Directive aligns our internal purchasing practices with our

external human rights commitments. In doing so, it prioritizes and provides commercial incentives for suppliers that demonstrate a commitment to social responsibility and human rights due diligence. During FY 2024 / 25, the Directive has been updated to further clarify processes and requirements, particularly as regards labor risk, collecting carbon emissions data from suppliers, and requirements for applying life cycle costing to energy consuming goods.



C.1.6 Group Directive Responsible Labor

We recognize that responsible employment and recruitment are critical to the protection of workers and their human rights. Apart from laying out obligations and procedures in areas like freely chosen employment, working hours, wages and benefits, and humane treatment, the Responsible

Labor Directive imposes an absolute ban on employing people below the age of 15, prescribes a rigorous set of protective measures for young workers and working students, and sets out a comprehensive remediation process for child labor victims.



C.1.7 Group Directive Zero Recruitment Fees

The Zero Recruitment Fees Directive states that no worker may be required to pay fees for their recruitment or employment by us or by any labor agent, sub-agent, or intermediary acting on our behalf. The document also contains tailored prescriptions for internal and foreign migrant workers. It specifies the fees that migrant workers must never be asked to pay (e.g., transport fees), as well as their rights to be informed of the working conditions and to receive their employment contract before

leaving their home country. Through this set of rules, we aim to mitigate the risks of forced labor that often result from paying employment fees, in particular in the case of migrant workers.

Thanks to our commitments, we set out clear standards to be followed by our business partners while driving internal alignment and accountability. The first four above-named documents are accessible on our website in different languages.





C.2 Impact assessment

C.2.1 General impact assessment

We ran a process to define the material topics of our sustainability strategy. This focused on the results of a research-based impact assessment of sustainability topics along our value chain. Our aim was to concentrate efforts where we could have the greatest impact on sustainable development. The analysis included data from procurement, sales, production, and human resources. The data was then overlaid with over 50 risk indicators from social hotspot databases, the World Bank, and the Organisation for Economic Co-operation

and Development (OECD). The assessment showed we had high impact potential on human rights across the value chain. Moreover, forced, compulsory, and child labor were evaluated as high in the steps "own operations," "raw materials," and "sourced goods."

Geographically, the general risk was seen as high in China, India, and Taiwan. However, the industry exposure along the value chain was lower than the average risk.

C.2.2 Child labor impact assessment

During the saliency assessment process, we mapped the risks of child labor present in our value chain, taking into consideration our own operations, the supply chain, distribution, products, clients, end users, and end of life. The resulting data showed that the risk of child labor mainly occurs in the extraction of certain raw materials in some of our products. The risks occurred in areas of the value chain far removed from our daily business operations. Even so, we have developed tailored due diligence actions and specific projects to better manage the child labor risks identified (see section on remediation).

assess any actual or potential risk of child labor that may exist in other areas of the value chain.

Examples of our efforts are the inclusion of child labor in our Human Rights Risk Management System; our close collaboration with industry experts and civil society organizations such as Save the Children, the Centre for Child Rights and Business, ELEVATE, and the Responsible Business Alliance; and the embedding of child labor risk assessments in regular and particular operating processes such as in our Internal Audit and Mergers & Acquisitions functions.

Apart from acting on the findings of the saliency assessment, we strive to continually identify and

C.2.3 Annual impact assessments

Own operations

Following the requirements of the German Supply Chain Due Diligence Act, we have designed and implemented a Human Rights Risk Management System that allows us to systematically identify and prioritize the human rights risks in our own operations.

The system is based on internal and external social Key Performance Indicators (KPIs), ranging from country risk indexes provided by Verisk Maplecroft to working hours records, whistleblowing reports and injury incident rates. Each KPI is weighted based on the likelihood, scope, severity, and remediability of the associated human rights risks. A final risk score is derived for each site. Sites are then classified on a four-level risk scale: very high, high, medium, and low priority. This scale, in turn, serves as a basis for prioritizing sites for extra due diligence measures, such as on-site auditing cycles, mandatory training tailored to the risks identified, and one-to-one support. We update the risk scores on an annual and event-based basis.

Supply chain

We have defined a target group for sustainability assessments based on identified sustainability risk factors – such as origin country and the material content of the goods procured, or potential labor risks for outsourced services.

To determine the sustainability risk factors on a country level, we used an impact assessment and hotspot analysis as a baseline. The hotspot analysis identified child labor and forced labor as being among the sustainability topics of highest relevance in our supply chain. For these high-impact topics, we include any supplier from countries listed as high-risk in the sustainability target group for assessment. During FY 2024 / 25, we updated the target group based on the latest available full-year data and new high-risk categories identified.

C.3 Responsibility and resources allocation

The dormakaba Sustainability Charter identifies the staff involved in the decision-making processes related to human rights due diligence, with the Human Rights function reporting to the Group Sustainability Officer. In addition to staffing subject matter experts on corporate level, we are steadily building the capacities of other relevant functions – such as HR, Procurement, and Internal Audit – for them to be adequately equipped to play a central role in achieving our Human Rights Roadmap.

Corporate Sustainability holds regular meetings where functions and stakeholders linked to human rights due diligence share their progress and difficulties. Also, the Group Sustainability Officer regularly briefs the Executive Committee and the Board of Directors about our progress in implementing the Human Rights Due Diligence Strategy. These regular interactions mean that stakeholders and levels of management are

engaged and aligned with our human rights goals. Whenever tensions arise between the human rights strategy and other policies or business imperatives, we remain faithful to our commitments and find solutions that fit the needs of the business and those of human rights due diligence.

Regarding resource allocation, we assign adequate resources to identifying and managing human rights risks. Examples include the recent creation of specialized job functions (particularly a human rights specialist and regional supplier sustainability specialists), the allocation of sufficient budget for conducting social audits in the company's operations and high-risk suppliers, and for remediation efforts and to pay the membership fees for multistakeholder organizations.

C.4 Prevention and mitigation

C.4.1 Own operations

To prevent and mitigate modern slavery risks and impacts, we have set a system of controls and assessments that range from thorough identity checks during the hiring process, to access systems that require personal identification, self-assessment questionnaires, on-site external and internal audits, and capacity-building exercises. We have also set strict requirements and processes to ensure that young workers and students are kept away from any hazardous tasks and their rights to education and development are respected.

In FY 24 / 25, we conducted five audits to identify actual or potential human rights risks and abuses in facilities classified as of high or very high priority by our Human Rights Risk Management System. We engaged ELEVATE, an industry leader in Environmental, Social and Governance (ESG) and supply chain services, to conduct the on-site audits. The audits were conducted according to the ERSAs 3.0 standard, which is in line with local law in addition to the International Labour Organization (ILO) Conventions and industry protocols including RBA, ETI, BSCI, SEDEX SMETA, and IETP.

Each initial audit is followed by the development of a comprehensive corrective action plan that addresses the findings and builds the capacity of the different stakeholders to prevent the same human rights issues from recurring. To ensure complete objectivity and best practice in developing corrective actions, ELEVATE guides the identification of root causes and the development of corrective action plans.

With a view to tackling the root causes of modern slavery and preventing the precarious situations that force people to stay in a job against their will or send their children to work, we refrain from offering excessively low wages ("wage dumping"). Moreover, we are a Living Wage Employer in some sites and strive to meet this standard worldwide.



As part of our initial audits, the São Paulo facility in Brazil received a **B rating**, with minor Health & Safety non-conformities that are currently being addressed. The Tocancipá facility in Colombia was rated **C**, with corrective actions needed in **Health & Safety** and **working hours**.

The audit of the **Suzhou facility in China** identified several areas for improvement, including **working hours, rest days, Health & Safety, and termination practices**. Similarly, the **Greater Noida facility in India** showed issues related to **working hours, rest days, Health & Safety, and wages**.

A **closure audit** at the **Chiayi facility in Taiwan** showed strong progress, with the site earning a **perfect score of 100/100**. All previous non-compliances were resolved, and, in line with the **Employer Pays Principle**, migrant workers were fully reimbursed for recruitment and ongoing fees, thanks to the proactive efforts of local management.

C.4.2 Supply chain

To increase our leverage in the commercial relationship, we strive to foster long-lasting, trust-based relations with most of our supplier base, providing incentives for those commercial partners that collaborate and behave responsibly. If the supplier refuses to participate in the assessment or implement our required corrective actions, we follow a governance system comprising steps that range from active communication to supplier offboarding.

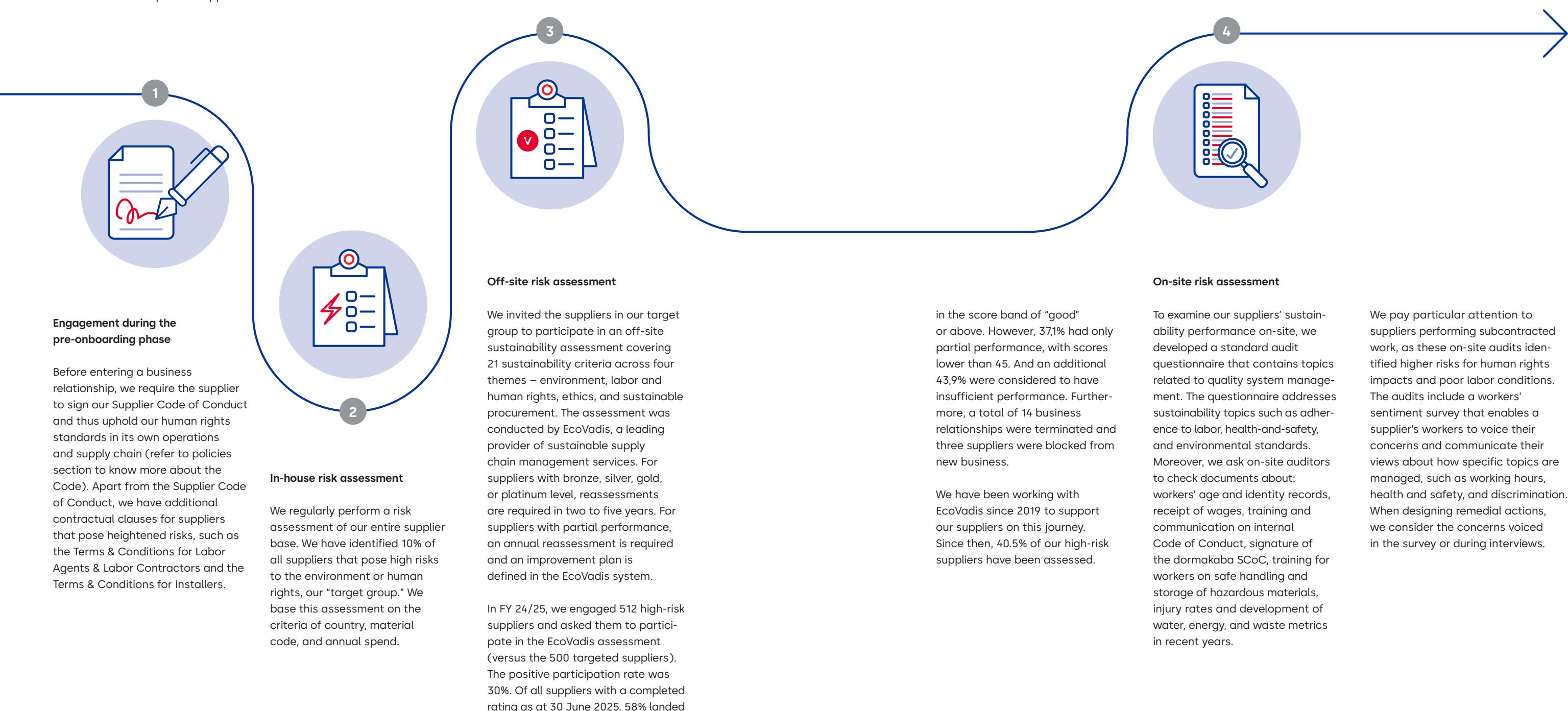
To help safeguard the interests and wellbeing of workers, we refrain from immediately leaving business relationships with suppliers where

nonconformances have been found, with the exception of Zero Tolerance findings. Instead, we take the time and make the effort to work with suppliers in putting things right. We believe this better protects the interests and wellbeing of workers, vulnerable groups, and local communities than immediately closing the business relationship.

Our activities to prevent and mitigate human rights impacts in the supply chain include the following:

“By conducting multi-layered assessments, we proactively identify and evaluate the risks of modern slavery within our supply chain. This approach empowers us to take decisive action, ensuring our existing and prospective suppliers align with globally recognized ethical standards.”

Stephanie Ossenbach | VP Group Sustainability Officer Sustainability





Cobalt traceability efforts

The extraction and processing of cobalt is often linked to human rights violations, including child labor. As a responsible company that procures electronic components, we have set a target to ensure supply chain traceability for minerals having high risk of child labor until 2027.

Since 2022, we have engaged directly with suppliers to gain greater insight into the upstream portions of our high-risk mineral supply chains. These conversations aim to assess the maturity of suppliers' conflict minerals and cobalt management systems, support improvements, and explore opportunities for deeper collaboration.

We select suppliers for engagement based on their responses to the Conflict Minerals Reporting Template (CMRT) or Extended Minerals Reporting Template (EMRT) from the RMI. These tools help us identify high-risk smelters further up the supply chain (Tier 2 and beyond), as well as the Tier 1 suppliers connected to them.

Insights from engagement in the first half of the financial year – combined with learnings from past years – led us to refine our strategy. Instead of broadly engaging all high-risk suppliers, we now focus on those who either failed to respond to our CMRT/EMRT requests or submitted weak disclosures, especially if they are linked to multiple components in our products. Our goal is to maximize transparency and help these suppliers improve their due diligence practices and reporting quality.

As part of this targeted approach, we conducted three additional dialogues in the second half of the financial year with suppliers that had provided incomplete or low-quality submissions. These discussions helped clarify the steps required to strengthen future disclosures.

Ultimately, we aim to build supplier capability and mobilize broader support across our supply chain to increase pressure at critical chokepoints – such as at smelters and refiners.

In FY 24/25, we continued to work with Assent Compliance in the U.S., reaching out to over 1,000 suppliers to gather CMRTs (excluding non-production and service providers). We also expanded our efforts in Germany with Assent Compliance and launched an automated outreach campaign, while manually engaging a risk-based selection of suppliers in other regions. Across all areas, 63% of suppliers submitted CMRTs. Of these responses:

- 60% reported no intentional use of 3TGs (tungsten, tantalum, tin, gold),
- 29% indicated strong compliance programs,
- 11% revealed weak conflict minerals procedures.

We also broadened our focus on cobalt and mica due diligence by requesting EMRTs. In total, 247 suppliers were contacted, yielding a response rate of 44%. Among respondents:

- 27% confirmed the use of cobalt or mica in their products,
- 12% had robust due diligence programs,
- 18% showed notable gaps in responsible sourcing.

We are also an active member of multistakeholder organizations like the United Nations Global Compact, and the Responsible Minerals Initiative, and we regularly collaborate with several others, such as the ILO Child Labour Platform. Indeed, we are often invited to share experiences and best practices in multistakeholder discussions, such as the webinar series on Child Labour Due Diligence organized by SECO International Labour Affairs (Swiss State Secretariat for Economic Affairs) and the UN Global Compact (Swiss network). Furthermore, we have published an in-depth study of the cobalt supply chains to raise awareness among industry peers and society in general about the complexities in the extraction, handling and transport of cobalt and its links to child labor. The study, by the University of St. Gallen, includes contributions from various sustainability and supply-chain professionals, who shared those practices they believed could improve labor standards and prevent human rights violations in cobalt supply chains.

Despite all the above efforts, we know it is virtually impossible to permanently maintain conflict-free supply chains for certain minerals. This is why we have begun a 10-year partnership with Save the Children Switzerland to establish a ground-breaking project that will effectively help child labor victims of small-scale mines in the Democratic Republic of the Congo (DRC). You can read more about this project in the following section.

In FY 2024/25, we conducted on-site audits at six subcontractor facilities.

In **Taiwan**, two closure audits showed significant improvement since the initial assessments. However, further progress is needed in key areas such as **migrant worker recruitment practices** and **health & safety standards**.

In **China**, two initial audits identified non-compliances related to **working hours, wages and benefits**, and **health & safety**. A historical case of underage work was also found. The individual involved was a relative of the company owner, who had helped during school breaks to gain life experience. Following consultation with the auditing firm and the Responsible Labour Initiative (RLI), it was determined that remediation was not required, as there was no risk to the child and no

ongoing concern. Both facilities received targeted support from **ELEVATE** to develop corrective action plans. All remaining issues have either been resolved or are being actively managed by local teams and our sustainable procurement specialist. Measures have also been implemented to prevent any future cases of underage work.

In **India**, audits at two subcontractor facilities uncovered issues related to **business integrity, working hours, wages and benefits, health & safety**, and **environmental management**. Both sites had **zero-tolerance violations**, leading to a suspension of orders and payments in line with our policy. Each facility worked with ELEVATE to create and implement corrective action plans. Some issues have already been addressed, while others are being resolved under the joint oversight of local management and our sustainability team.

C.5 Access to remedy

As stated in our Code of Conduct, we are committed to providing rightsholders with access to remedy.

C.5.1 Remediation process should child labor be found in our operations

The child labor remediation process detailed in the Responsible Labor Directive is a prominent example. The process says that any child found working on our premises must have access to medical checks, financial support to complete their compulsory schooling, and the maintenance of their income until they become eligible to work. If legally and practically possible, the child must be transferred to a workplace learning program. Following the [ILO-IOE Guide for Business](#), we strive to ensure the

child's best interest by replacing the lost family income and accompanying the child through the recovery process. Labor agents and subcontractors must also adopt the above remediation process. Regarding the rest of the supplier base, we expect all our suppliers to provide adequate remedial help for any child laborer found in their own operations or supply chain.

C.5.2 Remediation for migrant workers

Another example of our remediation efforts is the reimbursement process in the Zero Recruitment Fees Directive, which responds to the risks related to migrant workers identified during our Human Rights Saliency Assessment. Migrant workers are known to be a particularly vulnerable group in today's value chains. They often face unequal treatment, discrimination, and abusive and fraudulent recruitment processes such as deception about the nature of the job, retention of passports, illegal wage deductions, and unethical business practices by recruitment agencies, which sometimes charge high recruitment fees and related

costs set up as loans they must repay. Until workers can pay their debt, they are de facto trapped in debt bondage, a form of forced labor.

We have not only translated our commitment to remediation into practical processes, but applied it to real-life situations. As an example, the on-site audit of our own operations in Taiwan in FY 23 / 24 found that migrant workers had paid recruitment fees to their labor agent. All fees paid by the migrant workers have been reimbursed, including the monthly fees and those paid over a decade ago.



C.5.3 Remediation of child labor victims in the Democratic Republic of the Congo

In a landmark project, we have joined forces with Save the Children Switzerland and The Centre for Child Rights and Business (The Centre) to address the pervasive issue of child labor in small-scale mining communities in the DRC.

We recognize that any company sourcing electronic components cannot be sure that the cobalt in its products does not come from the DRC, where 70% of the cobalt mined worldwide originates and which is well-known for high levels of child labor. The project – to which we are committed for ten years – supports affected children and young people in mining centers in the DRC and provides long-term remediation. Children and young people working in cobalt mines are reintegrated into school or vocational training programs to give them new opportunities. The project offers monthly living stipends, covers all educational and possible medical costs up to the age of 16, and provides each child with a case manager who supports the family and looks after the child's interests.

Each child is given a unique plan tailored to their specific needs, ensuring a holistic approach to the remedial help they get. For some children,

adequate help means reintegration into the school system, while for others it also requires extensive psychological support. This individualized care is critical in helping these children overcome their difficult circumstances. By working closely with local organizations and practitioners, our external partners – Save the Children Switzerland and The Centre – ensure that the interventions are culturally sensitive and more likely to succeed. This community approach uses local knowledge and expertise. It fosters the creation of a network of support that helps current victims and prevents children falling into the same circumstances in future. Presently, 23 children are onboarded into the remediation program thanks to our contribution. We are committed to boosting the impact of this initiative by encouraging other companies that use cobalt to join it. This will drive broader change and contribute to the larger-scale fight against child labor in cobalt supply chains.



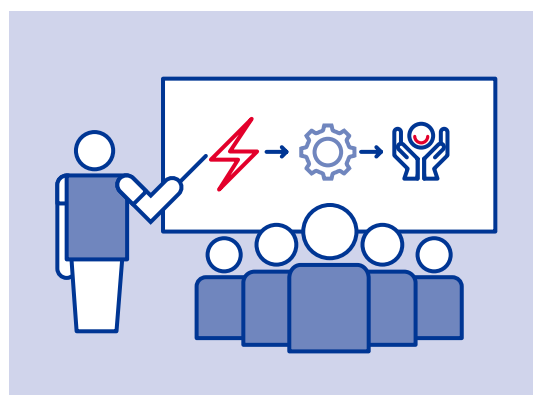
C.6 Training

C.6.1 Own operations

We strive to build the capacity of our functions and our overall organization to identify and manage human rights risks and violations. To raise awareness and increase the knowledge among our relevant functions, we regularly organize workshops on diverse topics related to social responsibility.

To ensure that capacity-building efforts reach beyond particular functions, since July 2024 all our employees have access to 12 micro-training

modules that cover aspects of responsible labor and the Group's standards, such as responsible recruitment of migrant workers, due diligence measures for preventing child labor, working hours, and fair wages. The modules include case studies and practical examples. They are mandatory for the HR managers of sites identified as high-risk for the specific topic that each training module covers.



Workshop provided by focusright



Access to 12 micro-training modules

The modules are also fundamental to our Human Rights Good Practices Hub. The Hub serves as a "one-stop-shop" for local managers to find out about the Group's human rights standards and applicable regulations, and lessons learned by their peers, as well as readily available assets to help them communicate and fulfill their obligations.

We have a dedicated training on our Statement of Commitment on Responsible Sourcing of Minerals that covers the human rights risks and violations prominent in supply chains of minerals like the 3TGs and cobalt – such as child labor and forced labor – and conveys the main elements of our strategy to mitigate those risks. The training includes tests and is mandatory for our procurement

leadership team and for purchasing managers who deal with materials related to high-risk minerals. In FY 24/25, 25 procurement employees were trained on our responsible minerals sourcing commitments. To accompany the roll-out of the updated version of the Sustainable Procurement Directive, we also launched a refresher training in June 2025 with 37 procurement staff participating. Follow-ups will take place until all procurement employees have completed it.

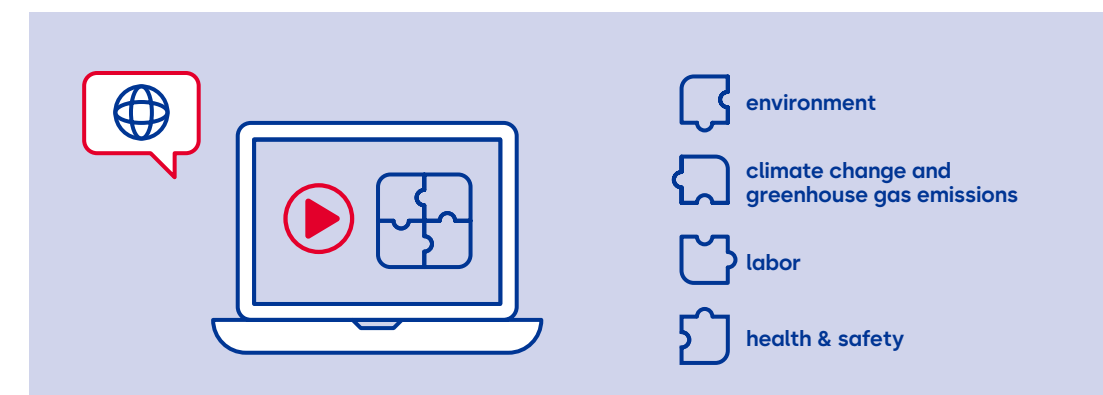
Lastly, the Human Rights Specialist continually works on building the capacity of high-risk sites and relevant functions through regular calls, workshops on specific topics, and general advice.

C.6.2 Supply chain

In pursuing our commitment to contribute to positive change in global supply chains, we finance training for suppliers assigned with high-priority corrective actions. The training is provided by ELEVATE via the EiQ platform. This delivers modules in an accessible manner, including case studies and examples of practical actions to be taken. The program includes four learning plans: environment, climate change and greenhouse gas emissions, labor, and health and safety. These training modules are available in several languages. Completing the training modules assigned is a mandatory corrective action for the selected suppliers. Any suppliers that refuse to participate in the program face the usual escalation process and may be offboarded. Of the 250

suppliers with high-priority corrective actions that have been invited to participate in the training, 23% have complied by the end of FY 24/25.

To further mitigate our salient human rights risks, we developed e-learning that lays out our requirements on ethical recruitment. These include freely chosen employment, zero recruitment fees, and mandatory pre-departure information. The training aims to protect prospective migrant workers and reduce their risk of being trapped into forced labor. The training was launched in early FY 24 / 25 and 100% of recruitment agencies from both sending and receiving countries have completed it.



Training for suppliers provided by ELEVATE via the EiQ platform

C.7 Tracking of performance

C.7.1 Own operations

Our recently implemented Group-wide Human Rights Risk Management System consolidates and standardizes our monitoring processes and tracks the performance of our measures to prevent and mitigate the risks of forced labor and child labor at site level. As explained in previous sections, we rely on on-site social audits to ascertain the management of risks related to forced labor, child labor, and employment abuse in sites identified as of high and very high priority, as well as to assess the effectiveness of the mitigation measures we set at Group level. Each initial on-site audit is followed by a root-

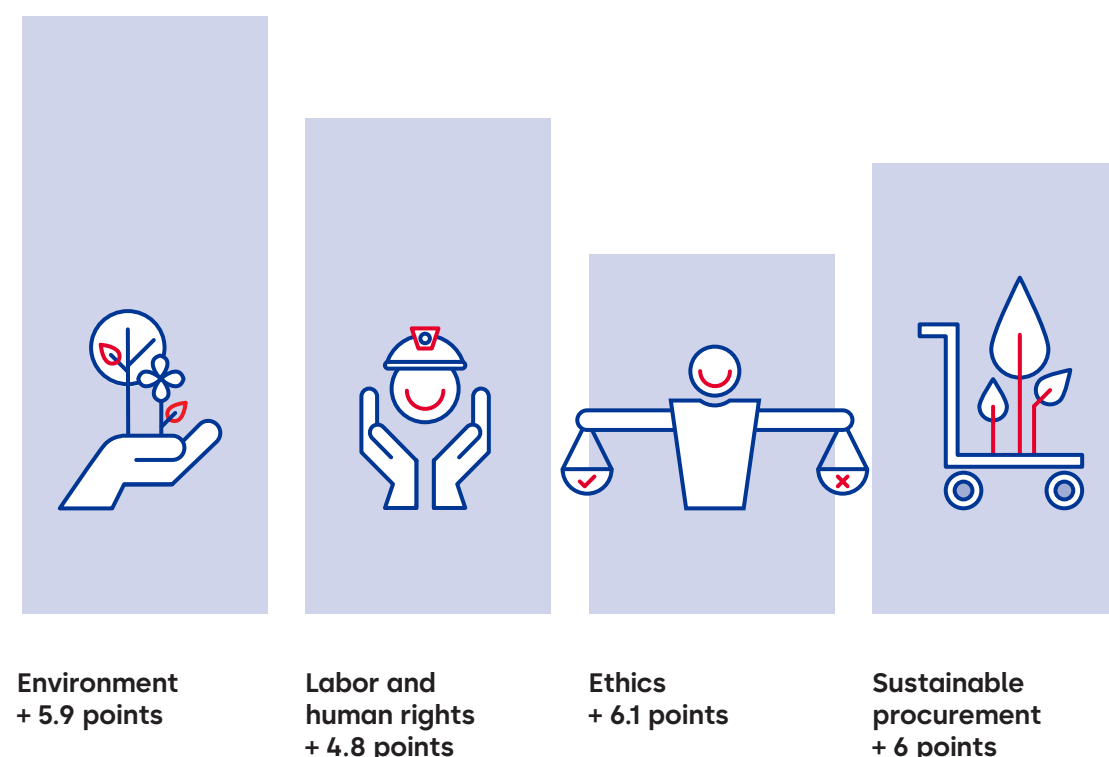
cause analysis by a specialized third-party auditing firm, and a corrective action plan. Our Human Rights Specialist receives the external audit results and tracks progress on corrective actions while also fostering continual dialogue with local managers.

Regarding the effectiveness of our awareness-raising efforts, we track participation of our employees in the training modules on human rights and sustainable procurement that are available.

C.7.2 Supply chain

For suppliers participating in the off-site assessment, reporting and statistics – including key strengths and areas of improvement as well as corrective action status – are visible on the EcoVadis platform. They are tracked by members of our Expert Group Supplier Sustainable Development.

Since we began cooperation with EcoVadis, 56% of all assessed suppliers have undergone a follow-up reassessment. Of those which had undergone a reassessment in FY 24/25, 77% improved their score, with an overall improvement of 5.6 points. Among those that improved, the average supplier improvements per pillar were:



The majority of reassessed suppliers exhibited either good (45%) or advanced (41%) performance. The proportion of suppliers with partial performance decreased from 18% to 10%. In FY 25/26 we will focus on better communication with our suppliers and monitoring improvements to increase the number of completed corrective actions.

Regarding the on-site audits among our sub-contractors, they are followed by a root-cause analysis by a specialized third party, who also designs tailored corrective action plans. Their performance is tracked by looking at their completion of the corrective actions.

Apart from the off-site and the on-site assessments, we give substantial effort to building the capacity of our high-risk suppliers so that they learn how to manage risks to human rights

in their own operations and supply chains. We recommend suppliers to undertake specific training based on gaps in their sustainability performance. We measure performance by tracking their completion rates.

We strive to communicate to all our high-risk suppliers the standards on responsible labor that they must follow if they wish to continue doing business with us. To that end, we require our high-risk suppliers to sign specific contractual clauses that state grounds for terminating the relationship if they do not respect our communicated standards. To ensure the strategy's effectiveness, we track the number of suppliers that sign the different contractual clauses, as well as the ones we offboard because they refuse to sign these documents.

C.8 Communication of performance

We transparently communicate our performance on human rights due diligence and our efforts to eradicate forced labor, child labor, and other

forms of modern slavery from our value chain in our annual Sustainability Report and in this Statement.

C.9 Engagement with stakeholders

In developing and implementing our human rights due diligence program, we continually engage with representatives from different functions at local level, external experts, and civil society organizations.

As part of our ongoing efforts, we work with a range of expert organizations and initiatives, including the **Responsible Business Alliance (RBA)**, **Responsible Minerals Initiative (RMI)**, **Responsible Labor Initiative (RLI)**, **Centre for Child Rights and Business**, **Save the Children**, and the **UN Global Compact (UNGC)**. We also collaborate closely

with **ELEVATE** and other consultancy firms to guide and strengthen our approach.

Our due diligence practices are widely recognized, and we are often invited to present them as examples of best practice at international forums. We actively engage in global platforms, including UNGC-led meetings, where we share both our challenges and the progress we've made in promoting responsible business conduct.

The public may also send feedback and questions directly to sustainability@dormakaba.com

C.10 Grievance mechanism

Our whistleblowing tool is for any internal or external stakeholder to use and is accessible in nine languages. This global grievance mechanism is legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continual learning, and dialogue-based. We have recently updated the tool to create a

specific category for human rights violations. We successfully closed all cases reported in FY 2023/24. In FY 24/25, 0 cases related to human rights were communicated via the grievance mechanism. We took appropriate action in both and have closed the cases.

D. Approval

We are committed to building on this approach in the coming years in view of our responsibilities as a good corporate citizen.



Till Reuter

Chief Executive Officer, dormakaba Group
3 September 2025

E. Attestation

In line with Canada's enactment of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular its section 11, I attest that I have reviewed the information in the report for all dormakaba entities, including dormakaba Canada Inc. and Skyfold Inc. Based on my

knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind dormakaba Canada Inc. and Skyfold Inc.



Svein Richard Brandtzæg

Chairman of the Board, dormakaba Group
3 September 2025

The information in this Statement has been approved by the Board of Directors of dormakaba Group and relates to the 2024 / 25 financial year. The scope included in this Statement covers fully-consolidated operations world-wide, including those of direct and indirect subsidiaries.



Our Sustainability Commitment

We are committed to foster a sustainable development along our entire value chain in line with our economic, environmental and social responsibilities toward current and future generations. Sustainability at product level is an important, future-oriented approach in the field of construction. In order to give quantified disclosures of a product's environmental impact through its entire life cycle, dormakaba provides Environmental Product Declarations (EPD), based on holistic life cycle assessments.

www.dormakaba.com/sustainability



Our offering

Access Automation Solutions

Entrance Automation
Entrance Security



Access Control Solutions

Electronic Access & Data
Escape and Rescue Systems
Lodging Systems



Access Hardware Solutions

Door Closers
Architectural Hardware
Mechanical Key Systems



Services

Technical Support
Installation and commissioning
Maintenance and Repair



Key & Wall Solutions

Key Systems
Movable / Sliding Walls



Safe Locks

Electronic Safe Locks
Mechanical Safe Locks
Boltworks and Accessories



Glass systems

Manual door systems
Glass fittings
Horizontal Sliding Walls



dormakaba
International Holding AG
Hofwissenstrasse 24
8153 Rümlang
Switzerland
T +41 44 818 90 11
sustainability@dormakaba.com
dormakabagroup.com/en



dormakaba.com