

dormakaba Statement of Commitment on Human Rights

This Statement of Commitment on Human Rights formalizes and specifies the commitment of dormakaba to support and respect human rights for all people, as outlined in the dormakaba Code of Conduct.

Subject matter and objective

The objective of this Statement of Commitment is to provide a common framework for the company's responsibility to respect human rights that is globally valid and underlies all its business activities and partnerships. It shall introduce a more effective and proactive management approach on human rights for the Group.

This Statement of Commitment clarifies:

- the relevant international human rights frameworks that dormakaba subscribes to
- the company's salient human rights issues
- the company's human rights due diligence framework describing the appropriate policies and processes to implement its human rights commitment.

Purpose

As stated in its Code of Conduct, dormakaba supports and respects the protection of internationally proclaimed human rights and labor standards. The company fully respects the personal dignity, privacy and individual rights of its employees, customers, suppliers and other stakeholders.

dormakaba aspires to play a leading role in responsible business conduct. Respecting human rights is an integral part of responsible business and builds on **trust**. The company wants to maintain the trust of all our stakeholders by treating people conscientiously and with dignity.

dormakaba acknowledges that all companies can potentially have an impact on human rights: either directly through their operations or via business relations. dormakaba recognizes the importance of human rights and already expressed its position in its annual Communication on Progress as a member of the UN Global Compact since 2013. For dormakaba, respecting human rights means doing the right thing and continuously

putting efforts into ensuring that day-to-day business decisions contribute to upholding and do not infringe human rights.

Framework of reference

dormakaba is committed to high standards of business ethics and integrity including the support and respect of internationally proclaimed human rights and labor standards as outlined in international human rights frameworks such as:

- Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- ILO Core Labour Conventions
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- Ten Principles of the UN Global Compact (UNGC)
- UNICEF's Children's Rights and Business Principles (CRBP)
- Responsible Business Alliance Code of Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- ISO 45001 Occupational Health and Safety Management (OHS) Standard

dormakaba also adheres to environmental conventions, in acknowledgement that a clean, healthy, and sustainable environment is a human right. These include but are not limited to the:

- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

dormakaba complies with the laws and regulations in the markets it operates. Where local laws are less stringent than the company policies and the above named internationally recognized human rights and employment standards, dormakaba is guided by the more stringent policies and standards and encourages its suppliers and business partners to follow these standards and principles.

Focus and salient human rights issues

dormakaba is committed to respecting internationally recognized human rights and does not attribute more importance to one human right over another. However, for the implementation of its human rights commitment, dormakaba prioritizes human rights issues that are most salient to the business – identified via a formal human rights saliency assessment conducted in accordance with the UNGPs.

Among the broader human rights issues identified, dormakaba commits to focus on the following salient human rights issues (in alphabetical order):

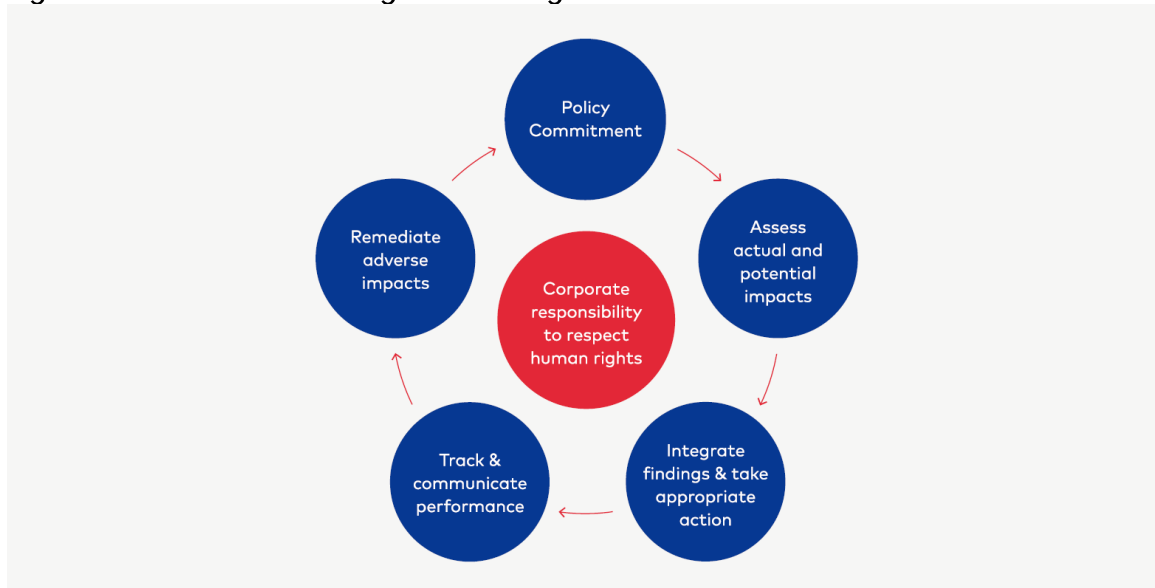
- Child labor
- Contributing to conflict
- Customer safety
- Environmental issues impacting human rights
- Migrant workers (forced labor)
- Outsourced services
- Occupational health & safety

In prioritizing these issues, dormakaba recognizes that for certain groups negative human rights impacts may be particularly severe due to their vulnerability or marginalization. dormakaba recognizes that the evaluation of the severity of potential impacts may change and that other issues may grow in importance over time. It will therefore regularly reevaluate the salient issues based on further assessments and regular dialogues with internal and external stakeholders.

Human rights due diligence

dormakaba conducts its human rights due diligence (HRDD) throughout its business to proactively assess, identify, prevent and mitigate actual and potential adverse human rights impacts on potentially affected rightsholders across its value chain. dormakaba also uses HRDD to identify where it can better support and promote individuals' ability to live and exercise their fundamental human rights.

Figure: Process of Human Rights Due Diligence



A. Policy commitment

As outlined in this Statement, dormakaba recognizes the important role the company has in respecting human rights, in line with the "Protect, Respect, Remedy" framework provided by the UNGPs, which defines:

- the state duty to **protect** against human rights abuses by third parties, including business;
- the corporate responsibility to **respect** human rights; and
- greater access by victims to effective **remedy**, both judicial and non-judicial.

The company's commitment to respect human rights also extends to all individuals throughout the value chain, and dormakaba uses its relationships with co-manufacturers, independent suppliers, and other business partners to encourage and promote the principles of this Statement throughout its network. dormakaba believes that it can influence others through leading by example and therefore communicates proactively about its commitment.

Human rights related standards are embedded in further internal and public policies including:

- dormakaba Code of Conduct
- Supplier Code of Conduct
- Environment Directive
- Responsible Labor Directive
- Zero Recruitment Fees Directive

- Sustainable Procurement Directive
- Health & Safety Directive

Particularly regarding employment and fair labor practices, the Responsible Labor Directive and the Zero Recruitment Fees Directive stipulate minimum standards for own and contract workers in terms of freely chosen employment, working hours, wages and benefits, child labor, freedom of association, fees and costs associated with recruitment and workers accommodation.

B. Assess actual and potential impacts

dormakaba identified its most salient human rights issues in accordance with the UNGPs and will regularly re-assess its human rights risks based on internal and external stakeholder feedback and expert judgments, recognizing that salient human rights issues may change over time.

Through this process, the company focuses on proactive stakeholder engagement as a tool to identify and mitigate potential risks and develop positive opportunities for impacted individuals. Salient issues and expected high risk areas are analyzed on an annual basis in more detail in order to identify appropriate measures to prevent and mitigate risks.

C. Integrate findings & take appropriate action

Based on the human rights-related risks and impacts identified, dormakaba develops prevention and mitigation measures integrated into company operations, training programs, policies and management systems. This is achieved through the development and implementation of a human rights roadmap approved by the Executive Committee. The roadmap assigns clear responsibilities to related initiatives and is monitored, updated and revised annually.

dormakaba is committed to a continued dialogue with internal and external stakeholders to continuously improve its HRDD. Where the company's ability to influence potential human rights issues is limited, it strives to enhance leverage through (industry) collaboration and partnership with key stakeholders, including employees, suppliers, civil society organizations and businesses partners to prevent or mitigate negative human rights impacts.

D. Track & communicate performance

dormakaba tracks the effectiveness of its actions and influence to ensure human rights are respected in its value chain through a system with clearly defined targets and key performance indicators monitoring the implementation of the human rights roadmap.

Where possible, dormakaba strives to measure the actual impacts of its actions on the human rights of potentially affected rightsholders.

Respect for human rights is an integral part of the global sustainability strategy and the company transparently reports on the progress of its efforts in its annual sustainability report as well as on its website to publicly account for how human rights issues are addressed.

E. Remediate adverse impacts

Access to grievance

dormakaba attaches great importance to an open corporate culture, where every employee is encouraged to speak up if they become aware of compliance risks. This includes issues as relates to human rights. Employees are encouraged to make use of the reporting channels outlined in the Code of Conduct. In addition, dormakaba ensures employees and external third parties, such as business partners or suppliers, access to an anonymous, confidential, and safe process for investigating grievances by means of a whistleblowing system which is operated by an independent third party. It is available for all individuals across the company's value chain. dormakaba encourages its suppliers and business partners to use their own effective grievance mechanisms and to inform their employees that the dormakaba [whistleblowing tool](#) is available for their use. dormakaba does not retaliate or permit retaliation against anyone who raises questions or concerns in good faith about corporate activities. The company is committed to investigating these issues thoroughly and providing appropriate responses and remedies.

Access to remedy

When adverse human rights impacts are uncovered due to the company's business activities or from linkages to its operations, dormakaba is committed to taking timely and transparent action to remediate in a fair and equitable manner in line with the UNGPs. Where dormakaba finds impacts directly linked to its business relationships, it will use its influence to encourage suppliers and business partners to respect human rights, whether through corrective action plans or termination on a case-by-case basis.

Scope of application

The Statement covers fully consolidated operations of dormakaba Holding AG worldwide, including those of direct and indirect subsidiaries and applies to all

dormakaba employees and managers, including part-time and temporary workers as well as casual workers (e.g. day labor workers).

Validity

The Statement comes into force from August 26, 2019 onwards and remains valid until further notice.

Responsibility

This Statement is written by Corporate Sustainability. All questions related to the content may be addressed to the e-mail address sustainability@dormakaba.com. Corporate Sustainability bears the responsibility for keeping this Statement updated. This Statement will be reviewed periodically and updated as required to amend it to changed business processes, regulatory requirements as well as political and societal expectations.

Communication and Implementation

This Statement is made publicly available on the dormakaba corporate website for the company's external stakeholders, suppliers and business partners. It is also made available on the company's internal communications channels. Furthermore, every manager must ensure that dormakaba employees become aware of this Statement, understand it and adhere to it. The authors' department is responsible for implementing the Statement into workflows and to provide trainings for employees as appropriate.

Approval

Svein Richard Brandtzæg
Chairman, dormakaba Group
01 May 2023