

Classification: Public

January 2023

## Rules of Procedure for Complaints

In accordance to the Lieferkettensorgfaltspflichtengesetz (LkSG) [German Supply Chain Due Diligence Act]

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## Foreword

As of January 1, 2024, dormakaba will be obliged to implement the provisions of the German Supply Chain Due Diligence Act (LkSG). Based on the LkSG, dormakaba applies due diligence in our operations to ensure that its own business activities and the supply chain are responsible regarding human rights and environmental matters. Compliance with the LkSG is a top priority at dormakaba. Potential violations of the law must be identified at an early stage in order to be able to initiate appropriate mitigating measures and prevent possible harm to vulnerable groups in our supply chain, our customers and other business partners, our employees, our company, as well as other stakeholders.

Therefore, dormakaba has already established a central complaints process in 2019 and has now adapted it to the requirements of the LkSG to fairly and appropriately follow-up on reports and complaints on human rights and environmental risks as well as violations of human rights and environmental obligations in the dormakaba supply chain. For employees, dormakaba has defined reporting channels and the corresponding procedure for reports in chapter eight "Misconduct and Sanctions" of the dormakaba Code of Conduct.

All complaints and reports received are reviewed confidentially and whistleblowers are provided with feedback. dormakaba ensures protection from retaliation or discrimination for whistleblowers who submit complaints in good faith.

In addition, the identity of the individual and the information provided will be protected to the fullest extent permitted by law. Confidentiality of the identity also applies to persons mentioned in and the subject of a complaint, as well as to other persons named therein. Legal and official obligations to provide information and notification are excluded from the principle of confidentiality.

dormakaba strives to make the whistleblowing tool accessible. For that reason, dormakaba ensures the possibility of reporting potential violations in multiple languages. Language selection is decided based on relevance to the workforce and the regions where dormakaba has the greatest presence.

**1. Does dormakaba have a group-wide procedure?**

dormakaba operates a group-wide, publicly accessible, and standardized complaint procedure. Every report and complaint are carefully reviewed by dormakaba. All reports and complaints are handled neutrally and objectively, taking into account the presumption of innocence.

**2. Who can submit complaints and reports?**

The procedure of complaints is accessible to everyone. Both persons and organizations outside dormakaba, such as business partners and their employees, as well as employees of dormakaba can submit complaints and reports.

**3. What kind of complaints or reports can be submitted?**

The complaints procedure is used to process reports or complaints about actual or possible violations of laws or internal regulations as well as possible human rights and environmental violations in dormakaba's supply chain.

**4. How can whistleblowers submit complaints or reports?**

dormakaba offers various reporting channels that can be used for complaints or reports.

Reports and complaints can be submitted anonymously at any time via dormakaba's externally operated whistleblowing tool. The whistleblowing tool is accessible via the internet, available in nine languages and can be found on the dormakaba website. Disclosure of identity is voluntary and not required. By setting up a postbox in the tool, anonymous communication between whistleblowers and the Compliance department is possible.

In addition, complaints and reports can also be submitted by e-mail to [compliance.global@dormakaba.com](mailto:compliance.global@dormakaba.com)

**5. What information should a report or complaint include?**

In order to adequately process and investigate a report, it is important to provide detailed information about the facts of the case. It is helpful to consider the following questions: Who? What? When? How? Where? and, if applicable, Why?

This information facilitates the proper processing of a report or complaint. However, it is not a prerequisite for processing that a report or complaint contains information on all of the above points.

If helpful for the further handling, documents can be submitted along with the report. When submitting documents, please make sure that own anonymity or the anonymity of others is not jeopardized, e.g. in the meta data in electronic files.

**6. Who will process my complaint or report?**

dormakaba's Compliance department is the central point of contact at dormakaba. It handles complaints and reports - regardless of which of the above-mentioned reporting channels have been used.

**7. What happens after the report or complaint has been submitted?**

Depending on the selected reporting channel, receipt of the complaint will initially be confirmed in writing or electronically, provided that the contact details have been submitted.

As soon as a complaint or report with contact details has been received by the dormakaba Compliance department - after seven days at the latest - whistleblowers will receive a confirmation of receipt.

**8. How will my report be followed-up?**

In a first step, the Compliance department examines all incoming complaints and reports to determine whether there are sufficient grounds for initial suspicion of a breach. Complaints and reports within the LkSG's scope of application are processed according to the provisions of these rules of procedure.

If the information provided in the report or complaint is not sufficiently specific, the Compliance department will check whether the person who provided the report can be contacted. If so, whistleblowers will be asked further questions and given a reasonable period of time to answer the questions in order to specify the facts and, if necessary, to substantiate a possible initial suspicion. If the report or complaint is not sufficiently specific even after expiration of the set period, the Compliance department will inform whistleblowers - as far as possible - that the proceedings will be discontinued due to a lack of sufficiently specific initial suspicion. The proceedings are thus closed.

If the investigation reveals that the complaint or report is sufficiently substantiated and falls within the scope of the procedure, an investigation will be initiated. Whistleblowers will receive a notification on the outcome of the preliminary investigation and the further steps of the procedure.

**9. What are the follow-up measures?**

If a suspected situation is assumed or if violations of human rights or environmental obligations are confirmed at a business partner, the Compliance department, where appropriate in collaboration with other departments, examines which follow-up actions are appropriate, necessary and reasonable in each individual case. Possible follow-up measures include business partner meetings to develop a plan to end a violation, up to and including termination of business relationships. If reports or complaints relate to internal dormakaba matters, follow-up actions may take the form

of process changes, training, disciplinary action (e.g., such as termination, warning, transfer) or other remedial action, such as risk management to bring the violation to an end.

#### **10. How are whistleblowers protected?**

Retaliation of any kind against whistleblowers will not be tolerated by dormakaba. Anyone who submits a complaint or report in good faith will be protected by dormakaba from negative consequences. If whistleblowers feel that they or another person have been subject to retaliation for submitting a complaint, dormakaba encourages whistleblowers to immediately notify the Compliance department through one of the Company's reporting channels.

To protect against the fear of consequences, you have the option of submitting observations anonymously via dormakaba's externally operated whistleblowing tool. Only the Compliance department has access to this tool and there is no possibility to discover the identity of the whistleblower as long as this is not divulged by the whistleblower him- or herself.

#### **11. How are complaints or reports closed?**

Whistleblowers and the business partners concerned will be informed in text form about the closing of the procedure. The results of the investigation and the follow-up measures are documented in an internal final report.