

dormakaba UK Modern Slavery Act 2015 Statement

This statement is made pursuant to Section 54, Part 6 of the UK Modern Slavery Act 2015 and sets out the steps dormakaba has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

As part of the dormakaba group, dormakaba is fully committed to uphold the principles of and adherence to our group policies covering human rights, forced, compulsory or child labour, environmental responsibility and business ethics.

Due to the complexity of our supply chain it is challenging for us to meet all our targets in the short term. It is within our suppliers' own responsibility to take all necessary steps to eradicate slavery and human trafficking in their own businesses and supply chains. Nevertheless, dormakaba will continue to update its policies and procedures as required to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

Our core values and principles are defined in our dormakaba Code of Conduct (see Attachment I). Our dormakaba Code of Conduct serves as a rule for ethical behavior in our daily business. The dormakaba Code of Conduct contains rules and requirements regarding human rights, forced, compulsory or child labour and Compliance with all applicable law and legal regulations in the following sections:

- I. Section C1: Compliance with the law and internal regulations
- II. Section C2: Human Rights
- III. Section C3: Trust, respect and tolerance
- IIII. Section C12: Supplier code of conduct.

Our group supplier code of conduct (see Attachment 2) has recently been developed and in the UK and Ireland our centralised purchasing department will use this to further develop its processes in the selection of suppliers along with our supplier appraisals processes. Our supplier code of conduct includes three main sections of specific relevance namely:

- Section I: Human rights
- Section II: Fair Labour Conditions
- Section III: Procurement by Supplier.

Furthermore, our internal business processes are subject to rigorous yearly internal audits by fully trained internal auditors as a result of our ISO management systems, which themselves are regularly audited for compliance by external 3rd party auditors. We also have access to group resources to aid us in the auditing of our suppliers should we require it.

Finally, it is our belief in dormakaba UK and Ireland that sustainable supply chains are ones which ensure the wellbeing of the people and environments we operate in, while seeking to grow our business and develop efficient supply chains through ethical and legal business practices.

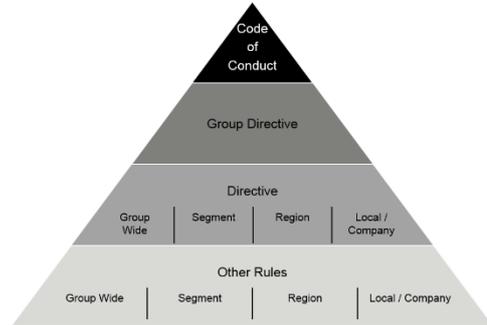


Stephen Bewick
Senior Vice President, UK, Ireland Access Solutions EMEA

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Classification of regulation

Code of Conduct



Title **dormakaba Code of Conduct**

Author / Contact Person Group Legal / Group Compliance

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A. GENERAL INFORMATION

A.1 Subject matter and objective

The dormakaba Code of Conduct (also hereinafter referred to as “the Code” or “the CoC”) is an expression of our company culture and our shared values to which we commit ourselves 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 mission statement, explains our values and aims at supporting every employee to take appropriate decisions consistent with laws and corporate regulations. It will be supported by further rules and regulations.

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 for 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 comes into force from July 1st, 2016 and remains valid until further notice.

A.4 Responsibility / contact person

Group Compliance is responsible for the content of the Code of Conduct. All questions relating to the interpretation should be addressed to Group Compliance.

If it is unclear whether the Code of Conduct applies, employees should consult their supervisor, the Executive Committee member in charge and/or the Compliance Officer.

A.5 Layout and Languages

The Code is available as document in different languages.

A.6 Communication and Implementation

Every employee receives 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 our dormakaba inside. In case of major changes of the CoC all employees will be informed. Furthermore, every manager must ensure that employees become aware of the Code of Conduct, understand it and adhere to it.

B. LETTER FROM CEO, MISSION STATEMENT AND VALUES

B.1 LETTER FROM CEO

Dear dormakaba Colleagues,

The dormakaba mission is to make access in life smart and secure. This can only be realized if we all work together based on our five values Customer First, Curiosity, Performance, Courage and Trust – the latter also being our overlying brand promise. These values aligned to and underpinned by a consistently legal and ethical approach in all matters, 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.

This Code of Conduct brings together in a single document not only values which unite us now and will continue to do so in the future, but also important core rules which provide a binding framework for each and every employee in his daily work.

It provides guidance for everyone from senior 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.

The dormakaba Code of Conduct contains guidance relating to specific issues such as corruption, conflicts of interest, tolerance, antitrust and competition law, and misconduct. It is available on the Group intranet Inside, with a copy given to all new employees to sign on their arrival.

We each have a responsibility to uphold our company's reputation. Anyone who breaches the Code will be seen as being disloyal. Such action not only damages the company's standing and brand but can also have serious direct financial consequences. The former Dorma and Kaba companies have established an outstanding reputation for themselves over the past 150 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 – this is something we have successfully prevented until now, and where this Code of Conduct will help us to continue in this positive tradition.

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,

Riet Cadonau
CEO

B.2 DORMAKABA MISSION STATEMENT AND VALUES

“We make access in life smart and secure.” This is the dormakaba mission driving our entire business activity. It reflects the ethos and commitment to entrepreneurship that defines our company. To help us deliver it in our daily work, we have come up with a number of joint values to serve as our compass:

- Customer First
- Curiosity
- Performance
- Courage
- Trust

The four values Customer First, Curiosity, Performance and Courage all contribute to the fifth value Trust, which at the same time is our brand promise.

These shared values 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. They apply to all employees of the dormakaba Group. Needless to say, they are no replacement for the law of the land; they are just there to provide guidance to people in their daily work, duly supplemented by this Code of Conduct, directives and country laws.

Each employee is part of a pyramid whose various levels represent the governance model of the Group. At the apex is our ambition which drives our desire to become the “Trusted Industry Leader.” This aspiration is underpinned by our corporate values which are, in turn, driven by regulations, guidelines and directives. Our Code of Conduct provides a binding tool, with relevant national and international law at the base of the construct. All pyramid levels are interconnected, although each is valid in its own right and can be regarded as a single, self-contained entity.

The formerly independent Dorma and Kaba companies had a long history of very similar values, a tradition that the dormakaba Group has followed in developing its own business principles. These are really a refinement of those maxims that brought success to the former companies. However, as they are not quite identical, here we provide more detail on each of these headings:

OUR DORMAKABA VALUES

CUSTOMER FIRST

Do we deliver added value for our customers?

- Deliver added value along the entire lifecycle of our access solutions
- Active listening to customers' needs
- Keep commitments, keep promises
- Ask for customer feedback, measure it, accept it
- Live professional integrity (ethical, moral and legal standards)

CURIOSITY

Are we open, and eager to learn?

- Be interested in others' opinions/know-how
- Ask questions, even if they feel stupid
- Show empathy and respect, care for each other
- Understand and respond to others' needs
- Live non-judgmental attitude

PERFORMANCE

Do we outperform the market with our offering of smart products, solutions and services?

- Win the market place, reach the set goals
- Always strive to find a smart, sustainable solution
- Deliver best quality in terms of reliability and design
- Provide smart and secure products

COURAGE

Do we speak up and take decisions?

- Give and receive feedback openly
- Step up, express own opinion and take decisions
- Admit to mistakes and allow to learn from them
- Be open for change

And last, but not least – our fifth value – and our overlying brand promise:

TRUST

Do we build trust through our outstanding behavior and performance?

C. CODE OF CONDUCT

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 mission statement, the company values 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. It may be augmented 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. Group 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. We fully respect the personal dignity, privacy and individual rights of our colleagues, job candidates, customers, suppliers and other stakeholders.

It is our declared aim to avoid any kind of discrimination for reasons of age, gender, race or color of skin, nationality, social or ethnic origin, language, sexual orientation, marital status, religion, state of health or disability or any other legally protected status under local law. On the contrary, dormakaba regards diversity as an important core value. dormakaba will not tolerate mistreatment, harassment or defamation of its employees or business partners.

Within its sphere of influence, dormakaba supports and respects the protection of internationally proclaimed human rights and ensures that it is not complicit in human rights abuses.

dormakaba does not participate in or benefit from any form of forced, compulsory or child labor. With regard to the minimum employment age, we follow the principles of the UN Global Compact and the conventions of the International Labor Organization (ILO).

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 the decision-maker to take reasoned and effective decisions.

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. Seeking to foster excellence in each individual, you as an employee shall be 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 act in.

C.4 Environment

The environment builds the natural living conditions of all beings. Efficient use of natural resources, energy and land conserves our environment. dormakaba is aware of its social and environmental responsibility and strives to achieve environmental protection by pursuing sustainable development. Taking the life-cycle perspective, we continually aim at improving the sustainability performance of our products and services.

dormakaba encourages its employees to contribute to sustainable development aligned to long-term savings of resources to protect natural reserves and the environment. In this pursuit, dormakaba raises employee awareness of the need for sustainable behavior through workshops and training events to ensure effective know-how transfer.

Finally, to increase transparency and to monitor the sustainability transformation within the organization, dormakaba publishes an annual sustainability report.

C.5 Conflict of interests

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 this is not possible be resolved in the best interests of dormakaba.

If you are or appear to be in a conflict of interests you must make this situation transparent by informing your supervisor 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. 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 (a new contract to be signed, new conditions to be agreed...). For more details, please refer to the Group Directive "Anticorruption."
5. You are buying from or selling to family members or close personal friends.
6. You are having or want to enter into a secondary employment. Depending on extend and manner, a conflict of interest could occur. For more details, please contact your local HR department.

C.6 Public relations and confidentiality

We keep sensitive information confidential and seek approval as described below before we communicate with 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 duly executed 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 Group Communication.

Any visit of media companies to dormakaba sites and facilities must be announced in advance and be authorized by Group Communication. 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 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 should ensure maximum transparency and equal treatment of market participants.

Further information can be found within 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.

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 supervisor/line manager bears a responsibility for the employees who are entrusted to him or her. 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 superior) will decide on the appropriate action. In case of doubt, advice may be sought from a higher line manager or the Compliance Officer (compliance.global@dorma.com). The recipient of such report must inform the Compliance Officer about all proven breaches of this Code of Conduct directly. He (the recipient) must also send a list of countermeasures taken to the Compliance Officer at the latest six months after the breach was initially reported.

Confidentiality will be maintained to the fullest extent practicable. All reports will be 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 he or she violate governing law or this Code of Conduct. Misconduct may lead to severe sanctions including the termination of employment. Legal sanctions may also ensue, including monetary fines or civil or criminal prosecution in particularly serious cases.

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 directly or indirectly, whether public authorities or in the private business sector, are forbidden. The same applies in respect of receiving such benefits. Facilitation payments are forbidden.

Generally, the giving and granting of benefits is only allowed if the following principles are followed and / or (prior) approval has been obtained.

- 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 with 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 where acting within the private business sector. By contrast, benefits to (or from) public authorities must be handled very restrictive.

Depending on the kind of benefit being granted / received (e.g. entertainment, travel, gift, meal), its business relation (plant visit, closing dinner) and the value, you will have to get an approval from a superior and/ or the Compliance Officer.

For more details please refer to the Group Directive "Anticorruption" or ask the Compliance officer.

C.10 Donating and sponsoring

We use donations and sponsoring to support common welfare projects and undertakings only, never for improper purposes. The donation or sponsoring activity must be commensurate with good corporate citizenship.

dormakaba garners the goodwill of society by donating to or sponsoring non-profit associations and organizations. In no case will dormakaba tolerate donations or sponsoring as vehicles to circumvent the anti-bribery rules of this Code. No donations or sponsoring activity shall be undertaken with the purpose of influencing a customer's (purchasing) decision. Whether or not local laws restrict the use of corporate funds in support of political activities, dormakaba refrains from financially supporting governments, political parties, organizations or candidates.

Generally, donations and sponsoring activities should not be undertaken:

- if the payment would be destined for a private bank account
- if the prospective recipient specifically asks for a donation
- if there is a link with other business decisions or such influence might be assumed
- if the donation itself is non-transparent
- if the reason for the donation / sponsoring activity is non-transparent and non-apparent.

If the total amount of donations / sponsorships per year to one recipient exceeds 1000 CHF or the equivalent in local currency, the Compliance Officer must be informed.

C.11 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 Group Legal in the event of queries or a need for advice. Further detailed information is provided within the Directive "Competition Compliance" which can be found on the dormakaba inside.

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 especially 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, 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: under increased scrutiny by the competition authorities

Vertical agreements within the supply chain

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

Special topic: Sensitive information (also within association meetings)

- Sharing information with market relevance which may reduce the “secrecy of competition” between companies, e.g.:
 - Quantities, turnover, sales figures
 - Current prices, price elements (e.g. rebates), terms and conditions of sale and payment conditions
 - Contemplated price increases, development of gross margins
 - Costs, capacities
 - Investments and market strategies
 - Marketing plans
 - Customer lists, results of customer meetings
 - Business risks
- Rule of thumb: All information which you would like to have from your competitors for your own business and which you would, in turn, not give to your competitors can be presumed to be sensitive information.

C.12 Supplier Code of Conduct

We believe in the values and the standards this Code of Conduct sets. We strive to ensure compliance with the above-mentioned precepts in our relationship with our suppliers. We are committed to our values and standards and we expect our suppliers / business partners to feel obliged to adhere to similar standards and rules. The specific requirements in this regard are regulated within the dormakaba Supplier Code of Conduct, which is applicable across the whole dormakaba group. You can find the latest version of this document on dormakaba inside.

D. APPROVAL

Ulrich Graf
Chairman of the Board

Riet Cadonau
CEO

dormakaba Supplier Code of Conduct

dormakaba is committed to very high standards of business ethics and integrity, as reflected in dormakaba's Code of Conduct (the "Code"). The Code is applicable to all dormakaba affiliated companies and employees, and this Supplier Code of Conduct (also hereinafter referred to as "Supplier Code") is a natural outgrowth of it and reflects dormakaba's desire to extend its commitment to high standards of business ethics and integrity to its Suppliers and their affiliates, officers, directors, agents, employees, representatives, subcontractors, and consultants (the "Supplier"). The Supplier Code is therefore made available to our Suppliers with the goal of strengthening our mutual understanding of how sustainable business should be practiced on a day-to-day basis.

dormakaba expects all of its Suppliers and their sub-contractors to adhere to equivalent strict working standards and business ethics. This Supplier Code states our general principles and sets our minimum expectations regarding the actions our Suppliers taken on behalf of our company and our clients.

Suppliers are obliged to ensure that these obligations are already in place. In addition, dormakaba and the Supplier may agree on further standards in supply related agreements.

Where compliance with the Supplier Code could lead to a conflict with or a violation of applicable laws and regulations, the Supplier shall promptly notify dormakaba of the situation, and explain how it intends to resolve the conflict while operating in a responsible manner that complies as closely as possible with the letter and the spirit of the Supplier Code.

This Supplier Code of Conduct shall be applicable beginning on October 1st, 2016, and will remain valid until further notice. It will apply throughout the dormakaba group and its entire supply base.

A. HUMAN RIGHTS

In accordance with the aforementioned statements, dormakaba requests the following business practices from Suppliers at all times, without exceptions:

- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his or her will;
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative behavior.

B. FAIR LABOR CONDITIONS AND CHILD LABOR

The Supplier will ensure fair labor conditions. In particular, it will:

- ensure that its employees work in an environment free of discrimination, harassment, intimidation or coercion relating directly or indirectly to age, gender, race, color of skin, nationality, social or ethnic origin, language, sexual orientation, marital status, religion, state of health or disability;
- comply with all applicable laws on preventing employment discrimination;
- respect the rights of employees to freely associate and bargain collectively;
- not use any forced or compulsory labor or involuntary prison labor, give all employees the choice to leave their employment freely upon reasonable notice, and adhere to the obligations of the UK Modern Slavery Act 2015;

- compensate employees fairly and refrain from offering excessively low wages (“wage dumping”), as exploitive behavior in this respect is at odds with the dormakaba principles.

The Supplier will not tolerate or use child labor in any stage of its general activities other than in accordance with all applicable laws and regulations; with regard to minimum employment age, Supplier will follow the principles of the UN Global Compact and the conventions of the International Labour Organization (ILO) Declaration.

C. OCCUPATIONAL HEALTH AND SAFETY

The Supplier will provide a safe and healthy workplace for all of its employees.

D. ENVIRONMENTAL RESPONSIBILITY

The Supplier is committed to environmental protection and will conduct its business in an environmentally sensitive way.

D.1 Hazardous Substance Management and Restrictions

The Supplier shall comply with all applicable laws and regulations prohibiting or restricting the use or handling of specific substances (e.g. toxic gases like chlorine). To ensure safe handling, movement, storage, recycling, reuse and disposal, the Supplier shall identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

D.2 Waste Management

The Supplier shall manage and dispose of non-hazardous waste generated from operations as required by applicable laws and regulations. The Supplier shall minimize environmental pollution and make continuous improvements in environmental protection. dormakaba encourages the Supplier to communicate to its management, employees and contractors its commitment to improving the environment, and to provide training on such commitment.

dormakaba reserves the right to audit any of its Suppliers to confirm that the requirements set out in this Code of Conduct are in force. Failure to permit such an audit may result in termination of any supply contract with dormakaba and its subsidiaries.

E. BUSINESS ETHICS

E.1 Honesty and good Faith

In all commercial transactions with dormakaba, as well as with their own Suppliers, subcontractors and employees, our Suppliers are expected to act in an honest and good faith manner, across all aspects of their operations, both internally and externally. The Supplier will conduct its business in an ethical manner in accordance with all applicable laws, rules, and regulations. In particular, the Supplier will:

- refrain from any and all forms of extortion and bribery;
- adhere to anti-trust and other competition laws, e.g., not participating in price fixing or bid-rigging; and
- disclose to dormakaba available information about conflict of interest, including disclosure of any financial interest of a dormakaba employee in any aspect of the Supplier's business.

E.2 Gifts

All illegal benefits to third parties directly or indirectly, whether public authorities or in the private sector, are forbidden. The converse applies in respect of receiving such benefits. Facilitation payments are forbidden as well as the offer or acceptance of a gift in cash or cash-equivalent. We expect our Suppliers to work according all international anti-bribery and anti-corruption standards.

E.3 Confidentiality

The Supplier and its Suppliers and sub-contractors will protect all confidential information provided by dormakaba and its respective business partners.

F. BUSINESS CONTINUITY PLANNING

The Supplier shall implement and maintain policies to mitigate the risk of business disruptions by exposures to risks including, but not limited to, terrorism, crime, software viruses, cyber attacks, business threats, labor disputes and strikes, disease, pandemics, natural disasters and major accidents.

G. PROCUREMENT BY SUPPLIER

dormakaba expects the Supplier to obtain confirmation from each of its sub-Suppliers providing goods or services directly or indirectly to dormakaba that the sub-Supplier acts in compliance with this dormakaba Supplier Code of Conduct.

H. COMPLIANCE WITH APPLICABLE LAWS, RULES & REGULATIONS

dormakaba Suppliers are expected to comply with all applicable laws, rules and regulations. This means laws, rules and regulations that apply to Supplier's location, but may also include the laws, rules and regulations of other locations depending on the nature of the transaction engaged in with the dormakaba affiliate and where that affiliate is located.

I. IMPLEMENTATION & COMPLIANCE

dormakaba expects its Suppliers to self-monitor their compliance with the Supplier Code, that is published in latest version on the dormakaba corporate homepage. In the case of any serious breach of this Supplier Code by the Supplier, dormakaba shall review its arrangements with the Supplier. dormakaba reserves the right to terminate its business relationship with any Supplier who is unwilling to comply with this Supplier Code.

J. GOVERNMENT, MEDIA AND INVESTORS RELATIONS

The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to dormakaba, without first obtaining prior written permission from dormakaba (except where required by Government or under the law). The Supplier must submit any such request to dormakaba Group Communication Department for appropriate authorization.

K. GOVERNING LAW

In the event of a dispute, this Supplier Code of Conduct shall be construed in accordance with the laws of Switzerland, not including its conflict of law rules. In any action arising under this Supplier Code, Supplier consents to both jurisdiction and venue in Switzerland, and agrees to institute any such action only in Switzerland.

L. SUPPLIER CONFIRMATION

Wherefore, by its authorized signature below, Supplier confirms receipt of a copy of the dormakaba Supplier Code of Conduct, and agrees to comply with its terms.

<p>Supplier Name:</p> <p>_____</p> <p>_____</p> <p>Supplier Address:</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p>Signature 1: _____</p> <p>Print Name: _____</p> <p>Title: _____</p> <p>Date: _____</p> <p>optional</p> <p>Signature 2: _____</p> <p>Print Name: _____</p> <p>Title: _____</p> <p>Date: _____</p>
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