Code of Conduct

The way we work

As of July 1, 2016, version 1.1

dormakaba

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A General information

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.

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.

Validity

This Code of Conduct comes into force from July 1st, 2016 and remains valid until further notice. It applies throughout the dormakaba Group.

What does this mean for my work at dormakaba?

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 direct manager, the Executive Committee member in charge and / or the Compliance Officer.

Layout and languages
The Code is available as document in different languages, within dormakaba Inside.

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.

"If we lose business because we adhere strictly to our Code of Conduct, this is done for a good reason." Riet Cadonau

B.1 Letter from the 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.

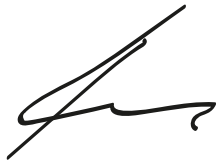
It places an obligation on us all to act responsibly in our dealings with business partners, customers and the general public, as well as our own people within the Group.

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 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:

Core values

- 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.

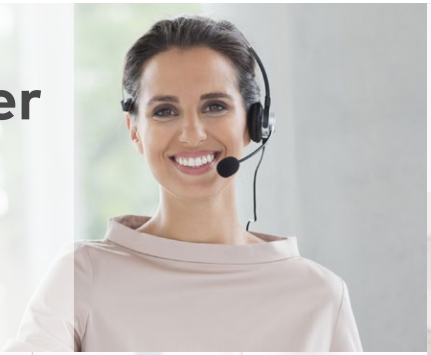
Each employee is part of a pyramid whose various levels represent the governance model of the Group. At the apex is our ambition which drives our desire to become the "Trusted Industry Leader". This aspiration is underpinned by our corporate values which are, in turn, driven by regulations, guidelines 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.

Our dormakaba Values

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:

Customer First

Do we deliver added value for our customers?



Trust

Do we build trust through our outstanding behavior and performance?

Curiosity

Are we open, and eager to learn?

Courage

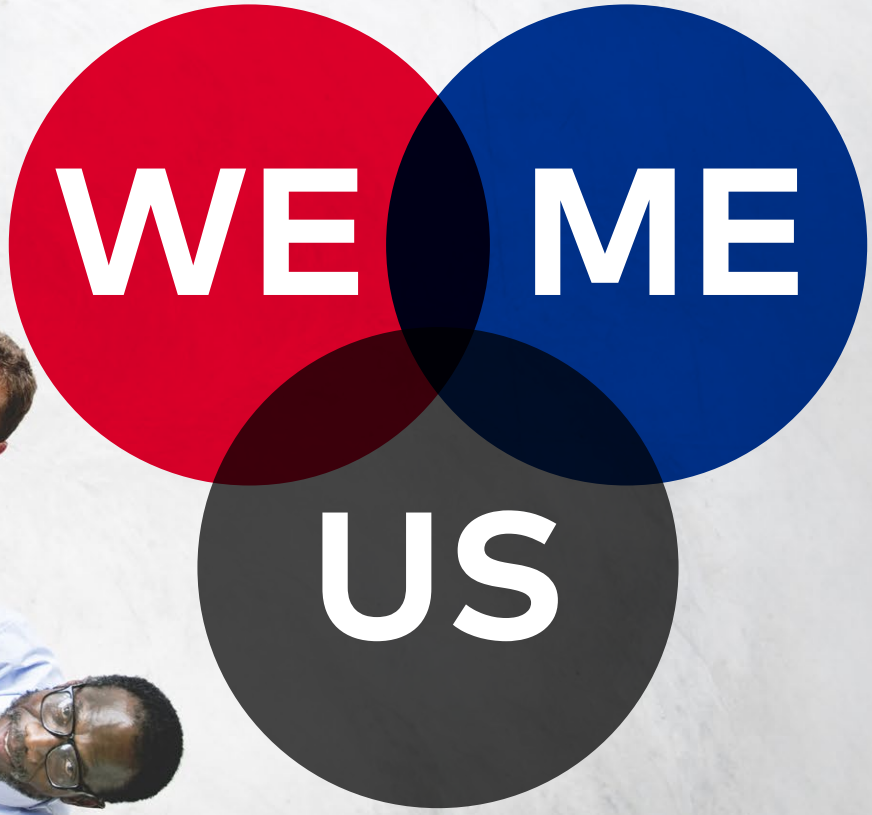
Do we speak up and take decisions?

Performance

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

C Code of Conduct

Structuring our Code of Conduct, we have taken different perspectives and marked the respective parts of our Code: What do you have to know from a WE point of view, from a ME point of view, and from an US point of view? But first of all, whom exactly do we mean by WE, ME, and US?



WE – What it means

WE

The Code of Conduct is valid for every dormakaba employee around the world. It is the language that we all speak, even though our cultures are different. This makes us all not only an international company, but a unit.

C.1 Compliance with law and internal regulations

What is it about?

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.

How do we act?

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.

Up close

We comply with all laws and regulations.

C.2 Human rights

What is it about?

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**.

How do we act?

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).**

What does this mean for my work at dormakaba?

We support and respect the protection of internationally proclaimed human rights.

C.3 Trust, respect, tolerance

How do we act?
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.

What are we seeking for?
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.

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

C.4 Environment

What is it about?
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.

How do we act?
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.

Did you know?

"The importance of sustainability has increased not least in the building sector where the vast majority of our products are used. Therefore, we are convinced that sustainability will impact our company's long-term success." Jörg Lichtenberg

ME – What it means

ME

If you feel like there is a conflict of interest, you can discuss the issue with your direct manager. Every manager will be willing to listen to you.

C.5 Conflict of interests

What is it about?

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.

How do we act?

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

How to handle a (presumed) conflict of interests

Make it transparent:

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

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 extent and manner, a conflict of interest could occur. For more details, please contact your local HR department.

What does this mean for my work at dormakaba?

C.6 Public relations and confidentiality

How do we act?

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.

How do we interact with media?

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.

Did you know?

We handle confidential information with care and seek approval before we communicate certain information.

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.

How do we act as a stock listed company?
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."

Did you know?

"Our reputation as a trustworthy company depends on the conscious, lawful behavior of all employees when handling confidential information." Daniela Schöchlin

C.7 Responsibility of each employee

How do we act?
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.

What do managers have to bear in mind?
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 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.

"To comply with the Code in letter and spirit means to understand its content and rationale. Ask your manager, local HR representative or the Compliance Officer in case of doubt." Bernd Brinker

C.8 Misconduct and sanctions

What is it about?

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.

How do we act?

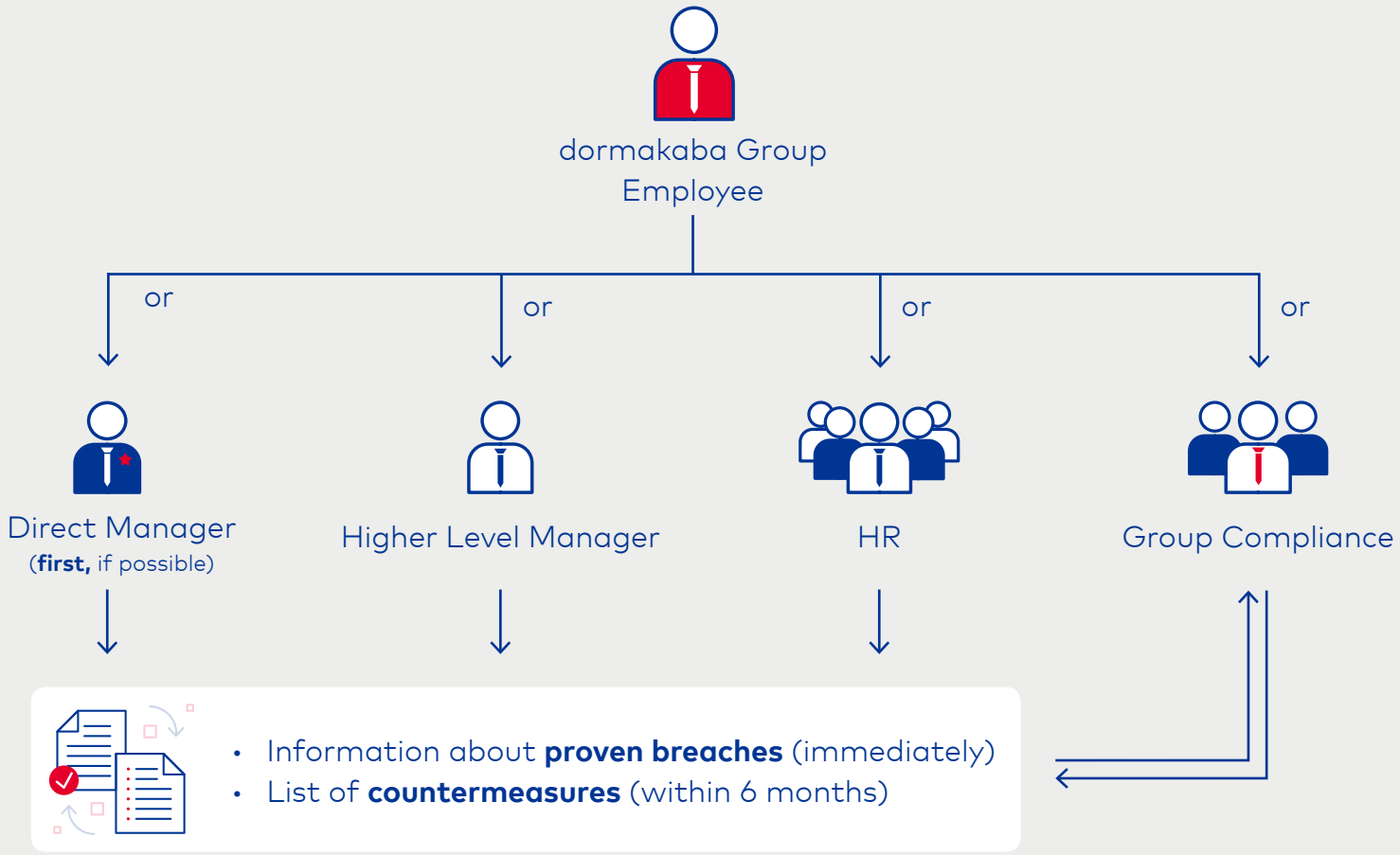
The person reported to (generally your direct manager) will decide on the appropriate action. In case of doubt, advice may be sought from a higher line manager or the Group Compliance Officer. The recipient of such report must inform the Compliance Officer / Group Compliance about all proven breaches of this Code of Conduct directly. He (the recipient) must also send a list of all 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.

What does this mean for my work at dormakaba?

Reporting channels

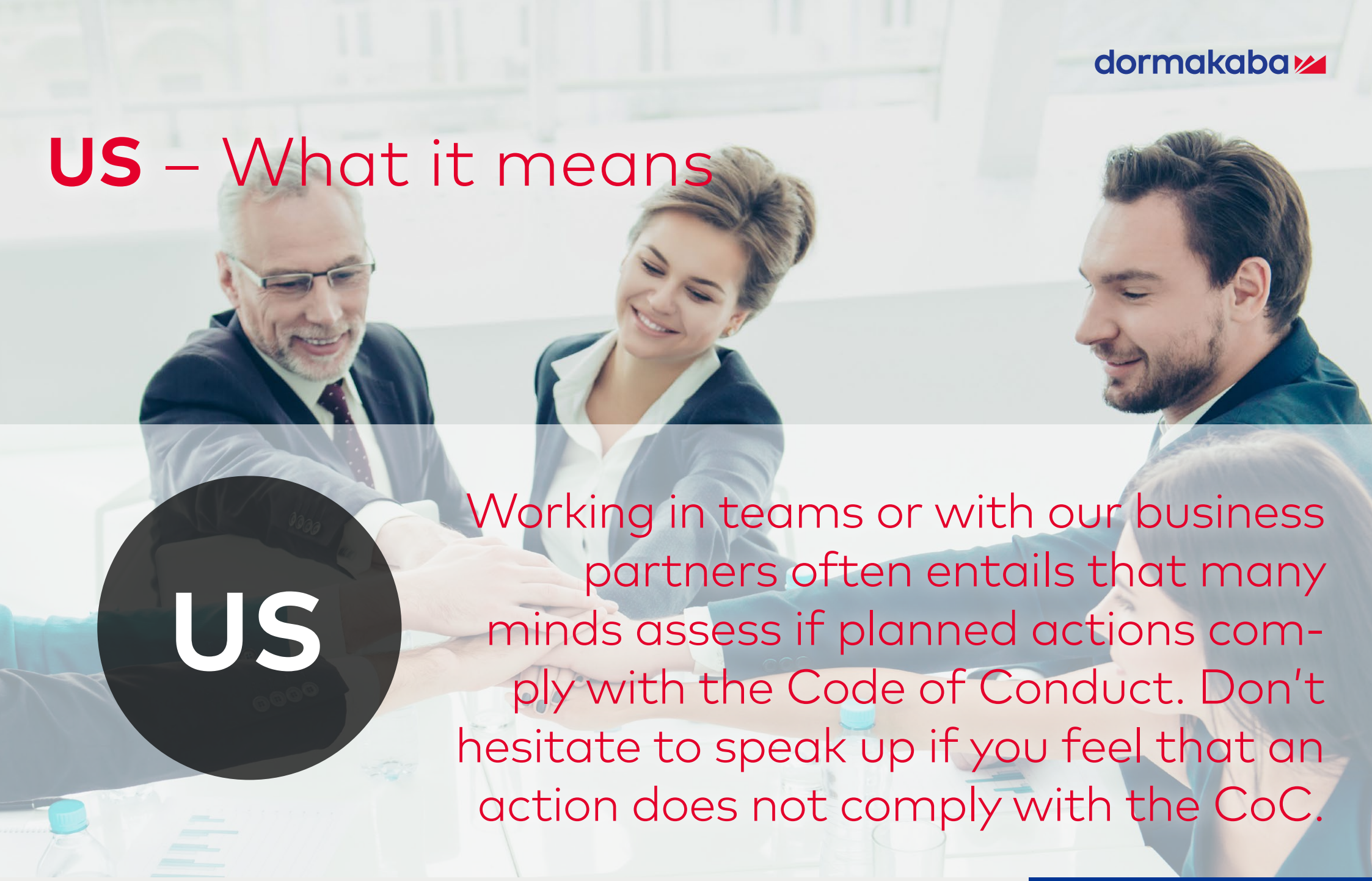


Confidentiality to the fullest extent practicable

All reports will be **carefully** investigated

Person raising the issue will **receive** feedback if wanted

US – What it means



US

Working in teams or with our business partners often entails that many minds assess if planned actions comply with the Code of Conduct. Don't hesitate to speak up if you feel that an action does not comply with the CoC.

C.9 Protection against corruption and **bribery**

What is it about?

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 converse 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

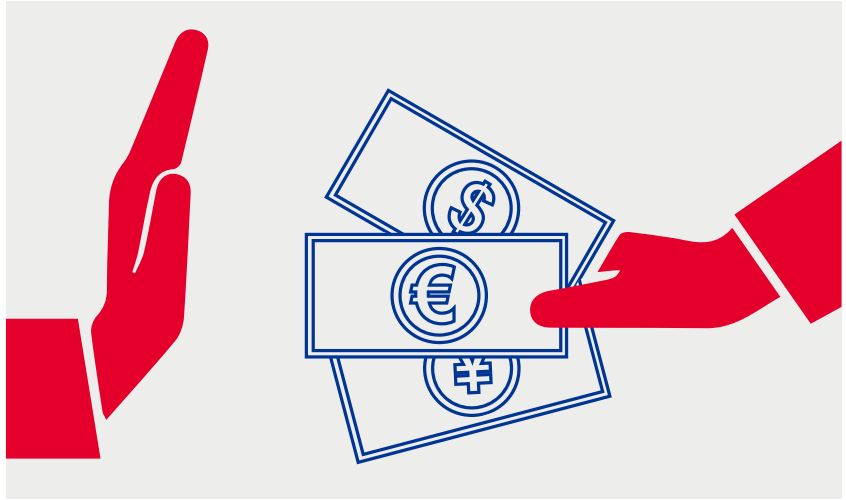
We adhere to legal requirements and therefore do not offer, pay or accept bribes for any purpose.

How do we act?

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 direct manager 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

What is it about?

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.

How do we act?

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

What is it about?
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 "Antitrust" 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.

What does this mean for my work at dormakaba?

We support a free market and regard fair competition as the best basis for our own growth and corporate success.

How do we act?

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.

Unilateral conduct:

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

Bilateral conduct:

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.

dormakaba

C.12 Supplier Code of Conduct

What is it about?

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.

Did you know?

We are committed to our values and standards and we expect our suppliers and business partners to feel obliged to adhere to similar standards and rules.

Glossary

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

For more details, please refer to the Group Directive "Ad hoc" within "dormakaba Rules&Regulations".

Antitrust law
Antitrust law is the area of law that deals with freedom of competition. Its aim is to secure the fairness and effectiveness of a free market economy, i.e. a functioning, competitive environment. Antitrust legislation thus forbids restraints in the commercial freedom of market participants (prohibition of restrictive practices). While the purpose of antitrust law is to maintain free competition, fair trading law is aligned to ensuring compliance with competition rules in a free and functioning commercial environment.

Bribery
The offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official or other person in the discharge of his or her duties.

Bullying
Bullying is an intentional act that causes harm to others, and may involve verbal harassment, verbal or non-verbal threats, physical assault, stalking, or other methods of coercion such as manipulation, blackmail, or extortion. It is aggressive behavior that intends to cause fear, distress or harm to another person's body, emotions, self-esteem or reputation. An imbalance of power between the aggressor and the victim is often involved.

If bullying is done by a group, it is called mobbing.

Confidential Information
Information which is only intended for predefined persons. You will find many dormakaba directives which give more information regarding "confidential information" such as the directives "Ad hoc", "Information Security", "Insider Trading" and "Antitrust". Please refer to those directives for further information.

Corruption
Corruption is the abuse of entrusted power for private gain.

Directives
A directive is a formal and mandatory executive order or official decision on a procedure. It describes a fixed, step-by-step sequence of activities which must be followed.

Discrimination
Treating a person or particular group of people differently, especially in a manner deemed to be worse than that in which other people are treated, because of their skin color, sex, sexuality, etc.

Facilitation payment
A small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement.

Fair Competition
Competition deemed reasonable in view of the interests of those competing and the public and not involving practices condemned by law as harmful to the public interest. By contrast, unfair competition is competition based on the abuse of near-monopoly powers, "competitor bashing", predatory pricing, etc.

Group Directives
A Group Directive (GD) is a set of basic rules by which the organization is guided. GDs supplement the CoC by disclosing more detail and providing further instructions. GDs are not limited to one specific task or working group and will generally address a majority of the employees.

Harassment
The act of systematic and / or continued unwanted and annoying actions of one party or a group, including threats and demands.

Human Rights
Human rights are rights inherent to all human beings, irrespective of nationality, place of residence, sex, national or ethnic origin, color, religion, language or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Insider
Please refer to the "Directive Insider Trading".

International Labor Organization
The International Labor Organization (ILO) is devoted to promoting social justice and internationally recognized human and labor rights, pursuing its founding mission that social justice is essential to universal and lasting peace.

Public Sector
The government and its decentralized units and agencies — including the police, military, public roads and transport authorities, schools and the public healthcare system — that use public funds and provide services based on the motivation to improve citizens' lives rather than to make a profit.

Rules and Regulations
Umbrella term for Code of Conduct, Group Directives, Directives and Other Rules within the dormakaba regulatory framework.

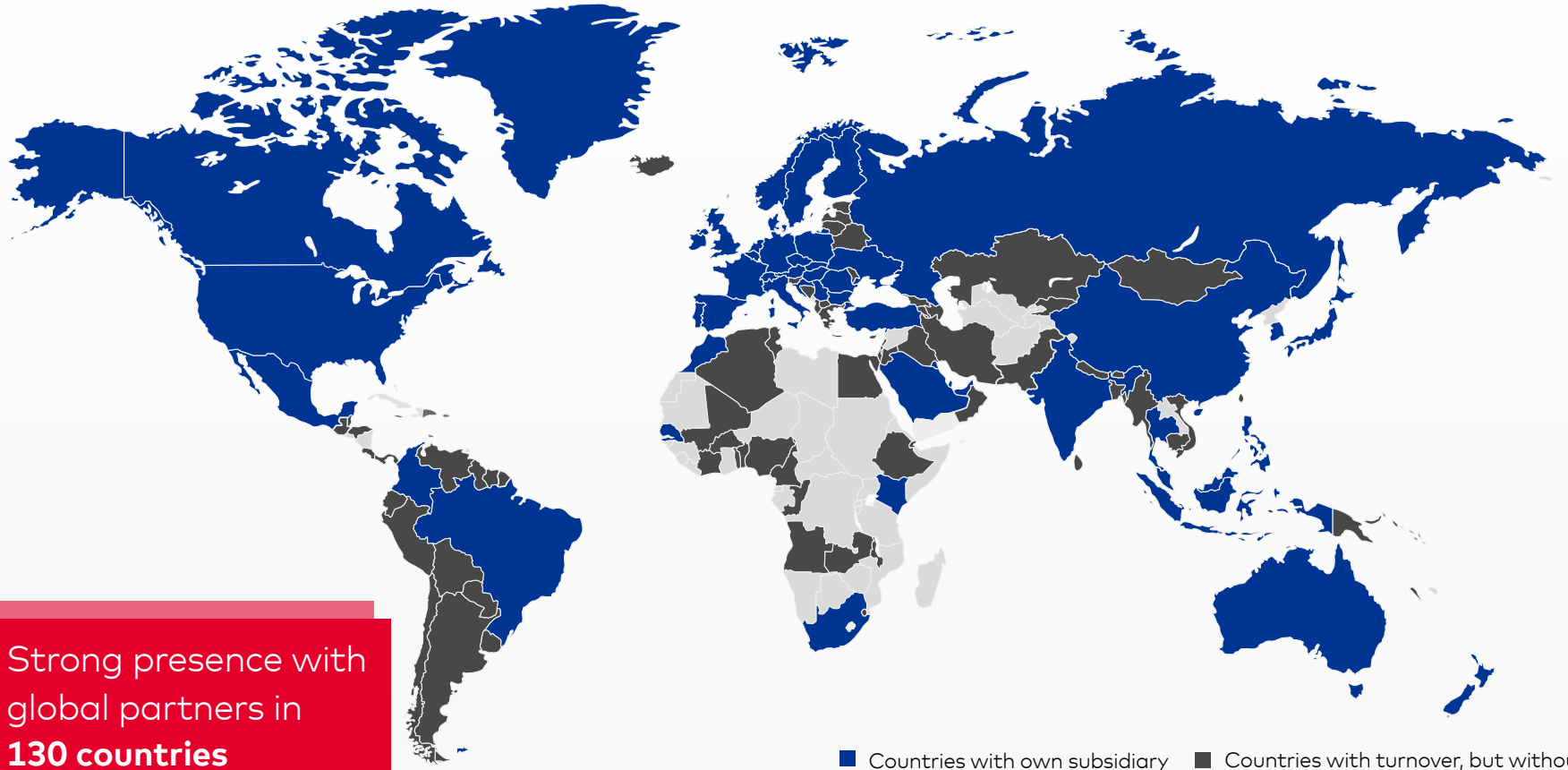
Sustainability
Sustainability is a core principle whereby the focus in relation to the use of resources is on retaining the essential characteristics, the stability and the natural regenerative capacity of the resource-yielding system.

Stakeholder
A stakeholder is someone with an interest in the development of an undertaking or who has claims on an undertaking. Stakeholders may be internal or external persons who are directly or indirectly affected either now or into the future by the entrepreneurial or other activities of the undertaking concerned. In keeping with the stakeholder approach, such persons have a right – similar to that of shareholders (owners / proprietors) – to represent, defend and assert their interests vis-à-vis said undertaking.

Transparency
Characteristic in governments, companies and individuals of being open in the clear disclosure of information, rules, plans, processes and actions. As a principle, the management of companies and board trustees have a duty to act visibly, predictably and understandably to promote participation and accountability and enable third parties to easily perceive what actions are being undertaken and why.

UN Global Compact
A voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals. https://www.unglobalcompact.org/

dormakaba facts and figures



Countries with own subsidiary
Countries with turnover, but without own subsidiary

Strong presence with global partners in **130 countries**

Top three position in the worldwide market for access and security solutions

Subsidiaries in more than 50 countries

About 16,000 employees worldwide

Over 2 billion Swiss francs in sales. dormakaba is listed on the SIX Swiss Exchange (DOKA)

Broad offering of products, solutions and services for access to buildings and rooms from a single source

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Contact
dormakaba International Holding AG
Hofwisenstrasse 24
8153 Rümlang
Switzerland
www.dormakaba.com