

Partnerships

We collaborate to promote sustainable development beyond our own doors

Workers in the Value Chain

We are committed to upholding human rights across our global value chain, working closely with suppliers and partners to ensure fair labor conditions.

As a company with a global value chain, dormakaba works with a diverse range of suppliers and partners across both the upstream and downstream segments. This includes those who source raw materials and produce components, and provide services (upstream), as well as those involved in installation and distribution (downstream). Ensuring fair labor conditions and good health and safety management practices throughout is of the utmost importance. While we do not have direct control over all workers within our value chain, we recognize the associated risks of potential human rights violations, such as the rights of migrant workers in the upstream value chain, or health and safety risks for installation workers in the downstream value chain. Consequently, we place strong emphasis on respecting human rights and require our business partners to commit to the same standards.

Our approach

Key functions such as Sustainability, Human Resources, and Procurement actively participate in stakeholder engagement with value chain workers and their representatives. The Group Sustainability Officer holds the most senior role responsible for overseeing the human rights engagement process and ensuring its results inform the company's approach.

Our [Sustainable Procurement Directive](#) and [Supplier Code of Conduct \(SCoC\)](#) define our expectations for responsible sourcing, covering sustainability criteria, supplier compliance, and ethical business practices, including workers' rights. The SCoC addresses human trafficking as well as forced, compulsory, and child labor and is part of our standard supplier contracts. Our Sustainable Procurement Directive outlines expectations towards local buyers and procurement colleagues, and stipulates that suppliers must sign the SCoC. Suppliers who refuse or do not have their own equivalent of equal quality are blocked from purchasing processes. The Sustainable Procurement Directive also includes a requirement for collecting carbon emissions data from suppliers to support our climate transition plan.

Furthermore, our human rights commitment, established in the [dormakaba Statement of Commitment on Human Rights](#), extends to all individuals throughout the value chain. **Our Human Rights Due Diligence process, detailed [here](#), is our core approach to addressing and managing any human rights-related issues throughout our value chain.** The [dormakaba Terms and Conditions for Labor Agents and Contractors](#) lays out the responsible labor requirements that all business partners providing or managing workers on behalf of dormakaba must comply with. Lastly, our [Statement of Commitment on Responsible Minerals Sourcing](#) outlines our expectations for suppliers in addressing human rights risks in our minerals supply chains.

Learn more about the content of the Sustainable Procurement Directive and Supplier Code of Conduct

Disclosure of
Sustainability-related
Directives

All employees of our suppliers and business partners (i.e., value chain workers) have the opportunity to communicate their grievances in an open manner through our whistleblowing tool, as outlined in our SCoC.

As part of our on-site audits at supplier facilities, we conduct a confidential worker sentiment survey that covers key topics such as working hours, wages, and harassment. This survey gives workers a safe way to share concerns. The anonymized results are reviewed by our sustainability team and used to discuss necessary corrective actions with the supplier.

We also require suppliers to provide effective **grievance mechanisms** for their workers. During audits, we check whether these systems exist, are accessible, and are known and trusted by employees. If a mechanism is missing, the supplier must establish one as part of a corrective action plan.

Additionally, dormakaba is a member of the **Responsible Minerals Initiative (RMI)**, which offers an independent grievance mechanism for value chain workers. This channel allows individuals to raise concerns about human rights, labor practices, or risks in mineral supply chains.

We monitor the effectiveness of these efforts through follow-up audits, analysis of anonymous worker surveys, and tracking the use of our [whistleblowing tool](#).

We are not currently pursuing material opportunities in relation to value chain workers nor have we taken measures to mitigate negative impacts on workers that arise from the transition to a greener, climate-neutral economy.

Read more about our whistleblowing tool in the Sustainability Due Diligence chapter.

Whistleblowing

Remediation for value chain workers

When adverse human rights impacts caused by our business activities or linked to our operations are discovered, we are committed to taking timely and transparent action to remediate them in a fair and equitable manner in accordance with the UNGPs. When we find impacts linked to our business relationships, we will use our influence to encourage suppliers and business partners to respect human rights.

If a zero-tolerance issue is found during an on-site assessment, all payments and purchase orders to the supplier are immediately suspended until the problem is fully resolved. We then conduct follow-up audits and closely monitor the situation to ensure corrective actions are taken.

In cases involving child labor, suppliers must follow a specific remediation process. This includes providing medical care, covering the child's education costs, and continuing to pay their full wage — without requiring them to work — until they reach the legal working age.



Children in the program

Remediating child labor victims in the small-scale mining communities of the Democratic Republic of Congo

In a landmark initiative, aiming for more responsible supply chains, dormakaba partnered with Save the Children Switzerland and The Centre for Child Rights and Business to tackle child labor in small-scale mining communities in the Democratic Republic of Congo (DRC), where 70% of the world's cobalt is sourced and child labor is widespread.

The project supports children and youth working in cobalt mines by reintegrating them into school or vocational training. Each child receives a tailored remediation plan, which may include psychological support, a monthly stipend, full coverage of education and medical costs up to age 16, and guidance from a dedicated case manager. This holistic, community-based approach ensures culturally sensitive, long-term solutions and builds a local support network to prevent future cases.

Over ten years, dormakaba will invest around CHF 1 million in the project. So far, 30 children have joined the program, of whom nine have already completed the remediation plan. To meet the increasing number of children onboarded, the number of case managers is also growing. Additionally, our partnership financially supports school access for the 138 underage siblings of the children participating in the remediation program.

We also engaged additional Swiss and international companies to expand the initiative and raised awareness at several gatherings of the Responsible Minerals Initiative and the Cobalt Congress.

Our activities

Supplier sustainable development

We are committed to maintaining sustainable supply chains that protect both the communities and the environments where our resources originate, while also promoting business growth through ethical and legal practices. We are therefore committed to leveraging our purchasing power to benefit partners whose values align most closely with our own. For example, we incorporate sustainability evaluations into new business award decisions as part of our new Sourcing Board.

Identifying supply chain risks

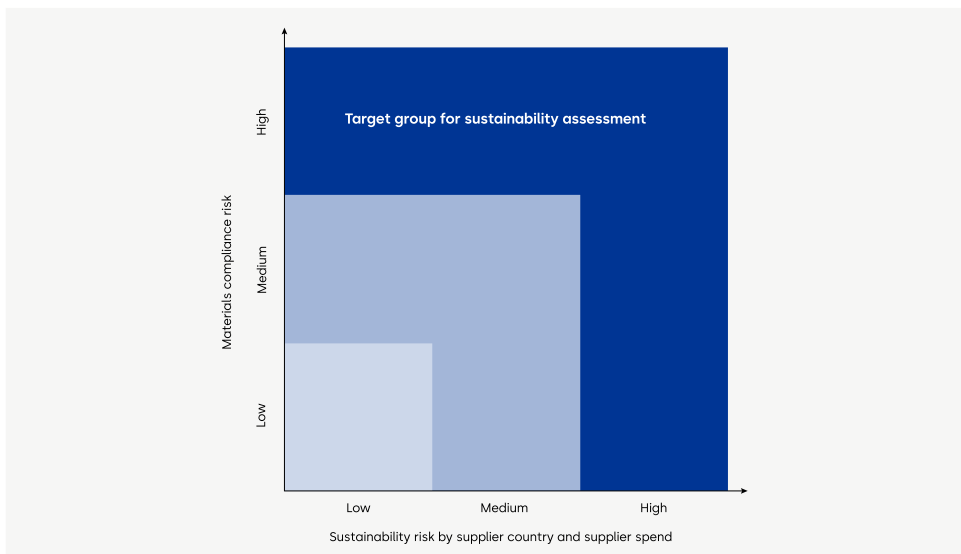
dormakaba has defined a target group for sustainability assessments based on identified sustainability risk factors — such as origin country, labor risks depending on the service provided, and the material content of the goods procured or potential labor risks for outsourced services. A material content risk assessment focuses on identifying potential hazardous materials covered by the European Union's REACH Regulation and RoHS Directive, as well as other applicable regulations such as the Toxic Substances Control Act (TSCA) and California Proposition 65. It also considers additional substances of concern, including per- and polyfluoroalkyl substances (PFAS), and conflict or other high-risk minerals such as tungsten, tantalum, tin, gold, and cobalt. Suppliers over a certain procurement threshold were taken into consideration as part of the categorization work.

The high-risk group includes 2,094 suppliers from our Tier 1 base, both for direct (e.g., material goods) and indirect (e.g., services) spend. The target group was updated in FY 25/26 based on the FY 24/25 spend data.

We are setting higher standards for our suppliers to foster circular solutions. Learn more about how we are increasingly sourcing recycled materials and goods harvested through responsible forestry practices.

Resource Use and
Circular Economy

Supplier categorization for sustainability assessment



Supplier assessments

We work together with our high-risk suppliers to assess, improve, and further develop their sustainability performance, thereby ensuring fair employment conditions for the workers in our value chain. Supplier Sustainable Development is therefore one of the material topics in our Sustainability Framework 2021–2027, for which we have set ambitious targets. By 2027, we aim to:

- assess all high-risk suppliers for their sustainability management via a third party or off-board them for lack of participation.
- have at least 45% of our high-risk suppliers participate in our sustainability engagement program.
- close at least 80% of high-priority corrective actions via assessed suppliers.
- have 90% of assessed suppliers with priority findings complete a sustainability training.
- provide information regarding conflict minerals for high-risk suppliers.

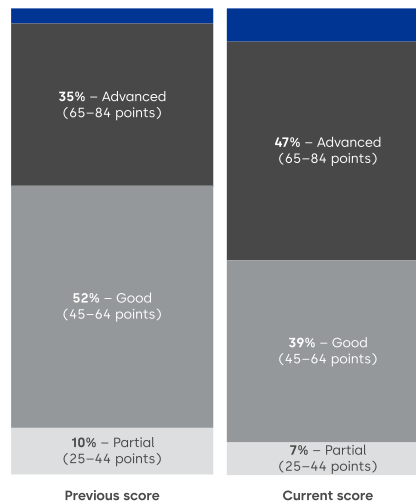
We have been working with EcoVadis since 2019 to support our suppliers on this journey. Since then, 42% of our high-risk suppliers have been assessed.

In FY 25/26, we engaged 546 high-risk suppliers and asked them to participate in the EcoVadis assessment (versus the 500 targeted suppliers). The positive participation rate was 29%. Of all suppliers with a completed rating as at 30 June 2026, 61% landed in the score band of "good" or above. However, 35% had only partial performance, with scores lower than 45, and 4% were considered to have insufficient performance. Furthermore, a total of three business relationships were terminated.

To track effectiveness of our actions, we monitor improvement in EcoVadis scores over time. 59% of all assessed suppliers have undergone a follow-up reassessment. Of those which underwent a reassessment in FY 25/26, 77% improved their score, with an overall improvement of 4.6 points. Among those that improved, the average supplier improvements per pillar were:

- Environment: +4.5 points
- Labor and Human Rights: +4.1 points
- Ethics: +4.7 points
- Sustainable Procurement: +6 points

The majority of reassessed suppliers exhibited either good (39%) or advanced (47%) performance. The proportion of suppliers with partial performance decreased from 10% to 7%. In FY 25/26, 47% of high-priority corrective actions have been closed.



Improvement in performance through EcoVadis reassessment

Due diligence on cobalt and conflict minerals

As a company procuring electronic components, we must take action to increase transparency in our supply chain regarding human rights violations during the mining of high-risk minerals. We are not directly involved in the extraction of minerals in the value chain, and we do not directly import or purchase raw ore or unrefined minerals, although small quantities may be present in some of our products' components. Therefore, collaboration with actors involved in mineral extraction, processing or transportation is crucial to identifying and managing the risks associated with potential links to conflict-affected or high-risk areas.

We also collaborate with others through our membership in the Responsible Minerals Initiative (RMI), chairing the RMI Cobalt Working Group. In this role, we directly engage with governmental stakeholders, smelters and refiners, multinational companies, and civil-society actors to define strategies that increase transparency in the cobalt supply chain.

To increase transparency, we have set the following target, based on our human rights saliency matrix and input from external experts and top management in the course of our regular target-setting process: **Our aim is that by 2027 we provide all relevant information regarding conflict minerals for high-risk suppliers and ensure supply chain traceability for minerals with a high risk of child labor.**

An important step in achieving these goals was the publication of our Statement of Commitment on Responsible Minerals Sourcing, which helps our suppliers understand our expectations when it comes to tackling the human rights risks in our minerals supply chains. The statement lays out the strategy and actions that we take in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas.

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

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

For more information on this topic, please see our Statement of Commitment on Responsible Minerals Sourcing.

[Download](#)

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

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

In FY 25/26, we continued our collaboration with Assent for conflict minerals due diligence in Germany and the USA, while further expanding our risk-based supplier engagement in other regions. Overall, more than 1,100 suppliers were contacted (response rate was 68%) to provide Conflict Minerals Reporting Templates (CMRTs). This engagement further improved transparency and supplier awareness of responsible mineral sourcing. Among the evaluated CMRT responses:

- 42% of suppliers confirmed the intentional use of at least one conflict mineral (tin, tantalum, tungsten, or gold).
- 26% demonstrated robust due diligence programs, including sourcing policies, implemented due diligence measures and active supply chain inquiries.
- 15% showed weaknesses in their responsible sourcing practices.

We also expanded our Extended Minerals Reporting Template (EMRT) program. While previous reporting focused on cobalt and mica, the scope was extended to include copper, graphite, lithium, and nickel in line with the latest Responsible Minerals Initiative (RMI) reporting approach. More than 700 suppliers were contacted to provide EMRT information, and 49% of those submitted a response. Among evaluated EMRT responses:

- 49% of suppliers confirmed the use of at least one of the six covered minerals.
- 27% demonstrated robust due diligence programs.
- 22% showed weaknesses in their responsible sourcing practices.

Copper was the most frequently reported mineral among responding suppliers, followed by cobalt and nickel.

Subcontractor on-site audits

We focus closely on subcontractors due to the higher risk of human rights and labor issues. To address this, we conduct third-party on-site audits via ELEVATE, including worker sentiment surveys on topics like working hours, safety, and discrimination. Feedback from these audits is used to shape corrective actions.

To protect workers' well-being, we avoid immediately ending relationships with non-compliant suppliers — except in zero tolerance cases. Instead, we work with them to address issues, as this approach better supports workers, vulnerable groups, and local communities. In cases of zero-tolerance findings, business is immediately stopped until the findings have been corrected.

During FY 25/26, 11 audits were conducted across Taiwan, Malaysia, China, and India, revealing mixed results. Several subcontractors achieved measurable improvements, including rating upgrades from D to C and the closure of priority findings, particularly in health and safety management. Notable progress was observed in Taiwan, Malaysia, and at one subcontractor in China, reflecting stronger management systems and corrective action implementation.

However, many suppliers continue to face challenges in addressing priority findings related to labor practices, health and safety, and business ethics. Consequently, most audited subcontractors will remain within the audit cycle and continue to receive monitoring and support. In China, targeted one-to-one coaching has been initiated to help suppliers strengthen their management practices and accelerate remediation efforts.

In addition to the follow-up audits, an initial audit conducted in India identified findings related to excessive working hours, insufficient rest periods, and health and safety

management. Overall, while positive progress is evident across several suppliers, continued oversight and engagement remain necessary to ensure the effective closure of priority findings and sustained risk reduction across the supply chain.

Procedures in the event of non-participation or non-compliance

A sustainable development clause is included in contracts for new and renewing suppliers falling under our high-risk category, requiring them to participate in off-site assessments or on-site audits and implement improvement plans if their performance falls below our benchmarks. At the start of the relationship, suppliers must sign the dormakaba SCoC, with those refusing or lacking an equivalent standard being blocked.

For suppliers invited for an EcoVadis assessment, we require further actions based on their score: reassessments are required every two to five years for high-performing suppliers, and annually for those with partial performance, along with an improvement plan. Suppliers refusing the assessment or with insufficient scores will be shortlisted for an on-site audit by ELEVATE, resulting in a corrective action plan with a one-year deadline. Suppliers failing to implement the plan are blocked or eliminated.

The Responsible Procurement Steering Committee meets regularly to address special cases, including monopoly suppliers, internal Code of Conduct checks, acceptance of non-EcoVadis assessments, and monitoring blocked suppliers or those in active elimination for poor sustainability performance.

Sustainability trainings for suppliers and employees

Our procurement employees play a critical role in achieving our goals related to Supplier Sustainable Development. Their understanding of sustainability and our processes related to EcoVadis and other sustainability-related information requests is vital. For this reason, employees working together with suppliers participate in training programs that prepare them for sustainability- and assessment-related conversations with partners. In FY 25/26, 138 employees across the organization completed the Sustainable Procurement Directive training. Within the procurement function, 76 employees completed the course, following 37 employees who completed it in the previous financial year. In addition, procurement employees received training on topics such as material compliance, supplier decarbonization, and the EU Packaging Regulation.

To support sustainable development, **we aim to engage 90% of assessed suppliers with priority findings in sustainability training by 2027**. Training is provided free of charge on four topics: environment, climate change, labor, and health and safety. Suppliers are recommended specific training based on performance gaps. Of the 73 suppliers that were invited to participate in the training program, 40% had completed by the end of FY 25/26.

Customers and End Users

Our vision is to become the trusted partner worldwide for safe, secure, and sustainable places where people can move seamlessly.

Our approach

At dormakaba, we prioritize the safety and satisfaction of our customers and end users. We focus on designing user-friendly solutions for safe, secure, and sustainable places. Through continuous product testing, certifications, and customer feedback, we enhance product safety, improve usability, and offer detailed guidance on installation and maintenance for safe and reliable operations. Additionally, we provide transparent information about the possible environmental and health impacts of our products in the form of Environmental and Health Product Declarations (EPDs and HPDs), among other things.

Our customers are primarily building owners, architects, and resellers. Our products and solutions are used in various buildings including those in the commercial, hospitality, healthcare, education, government, transportation, and residential sectors.

dormakaba does not have formalized directives or policies specifically dedicated to the two topics related to customers and end users that have been defined as material: Customer Health & Safety, and Marketing & Labeling. However, we adhere to rigorous international standards and internal processes to share accurate product information and to ensure the health and safety of our end users. Additionally, our **Rules of Procedure for Complaints** complies with the German Supply Chain Due Diligence Act, and allows us to fairly and appropriately follow up on reports and complaints on human rights and environmental issues. Reports and complaints can be submitted anonymously at any time via dormakaba's externally operated [whistleblowing tool](#). Furthermore, contact information is available on our local websites, and our customer service teams and certified installers are accessible for assistance, even in noncritical situations.

In addition, our internal **Sustainability Communications Guidance** defines the dos and don'ts of communicating about sustainability achievements and product sustainability, in order to reduce the risks of greenwashing. The Corporate Sustainability function is in charge of assessing the risks that may arise from related external communications and reviewing content on social and environmental performance.

Customer Health & Safety

As one of the top three global access control and security solutions companies, customer health and safety is fundamental to our sense of product responsibility. Customer safety has also been identified as one of our [salient human rights issues](#), as it is associated with the fundamental right to health. By identifying and minimizing all possible risks relating to our products — including those arising from harmful materials or potentially dangerous functional features — we ensure the safety of our customers and end users.

Our activities

Public buildings must meet high health and safety standards, and dormakaba ensures compliance with internationally recognized standards such as the European Standard (EN), American National Standards Institute (ANSI), and the Deutsches Institut für Normung (DIN,

German Institute of Standardization), including DIN 18040 for barrier-free construction. At dormakaba, no product can be installed in the field or released for production without the appropriate certification or technical product safety instructions.

Through our ISO 9001 quality processes, we continuously monitor product safety as part of our local management systems. **68% of manufacturing sites have ISO 9001 certification.** Additionally, the global Quality, Health, Safety, and Environment (QHSE) function works together with local QHSE managers to drive transparency regarding potential product safety issues.

We have established a global definition for quality escalations, based on potential impacts on the customer in terms of safety, quality, reliability, or delivery. Factors include failed re-certification tests, notices of regulatory non-compliance, or quality issues that could lead to product recalls. In the event of a quality escalation, we follow a harmonized global process, including containment actions, root cause analysis, corrective action, and preventive measures.

We have established the requisite business processes in order to achieve our global target of **having at least one corrective action and/or one awareness training session for each product-related injury**. To do so, we launched a workflow within our global incident management tool for identifying product safety risks. This system enables us to monitor corrective actions, ensuring that we have a defined process in place if any product-related injury occurs. Furthermore, it allows us to collaborate across the globe on driving effective corrective actions for escalated issues and incidents to ensure product safety. In FY 25/26, there were no confirmed incidents of injuries related to our products.

Additionally, during the reporting period under review, no human rights incidents connected to consumers and/or end users were reported. Should such cases arise, remedy is provided as explained in our [Due Diligence chapter](#).

To ensure product- and solution-specific customer health and safety, our Access Solutions and Key & Wall Solutions businesses are developing adequate action plans.

Access Solutions

Our Access Solutions (AS) business provides products such as escape route solutions, entrance systems, and hotel access systems. We work to address fire safety and electromagnetic interference, and to reduce hazardous substances, as well as to ensure that emergency exits open following a power failure.

Fire testing: Typically, this can consist of placing the door assembly with locks in a door leaf, exposing it to a specified temperature for three hours. The test is passed if no flames appear on the unexposed surface during the first 30 minutes, and failed if flames penetrate the door. All our building hardware products specified for fire-rated doors in Europe are tested in accordance with EN 1634-1 or EN 1634-2, and EN 16035. EN 1634-1 defines the method for testing the fire resistance of door assemblies, while EN 1634-2 focuses on assessing how building hardware influences the fire performance of hinged or pivoted fire doors.

In the U.S., we comply with the Underwriters Laboratories (UL) 10C standard for Positive Pressure Fire Tests of Door Assemblies. Furthermore, we adhere to the Office of the State Fire Marshal's (SFM) Building Materials Listing Program requirements, ensuring that fire doors are approved and listed by the SFM before sale or marketing within California state.

Hazardous substances: Our products are designed to comply with applicable requirements on hazardous substances, covering substance restrictions, chemical safety, product end-of-life, and information obligations in our key markets.

We comply with the RoHS Directive (including 2015/863/EU) for electronic products placed on the EU market. We also adhere to chemical regulations such as REACH (including requirements related to Substances of Very High Concern (SVHC)), as well as applicable requirements under the U.S. Toxic Substances Control Act and chemical information and labeling laws, such as California Proposition 65. Our approach is supported by structured material data collection, supplier engagement, and continuous monitoring of regulatory developments.

Electrostatic discharges: All Electronic Access & Data products come with a CE self-declaration, which is based on various mandatory test standards such as ESD (electrostatic discharge EN 61000-4-2), EMC (electromagnetic compatibility EN 55032/EN 55035) and product safety (IEC 62368) to ensure safe operation. Products equipped with radio-frequency identification are tested based on the RED (Radio Equipment Directive) EU regulation.

Electrified locking devices sold in Europe comply with EN 14846, EN 15684, and EN 16867. EN 14846 covers requirements for the performance, durability, and security of electromechanically operated locks and striking plates. EN 15684 applies to mechatronic cylinders and their keys, specifying performance and security standards for use in building applications. EN 16867 addresses mechatronic door furniture, focusing on electronic access control functionality operated via credentials such as cards, codes, or biometrics.

Electrified locking devices sold in the U.S. comply with the ANSI/BHMA A156.25 standard, which checks for reliable operation under slam cycle tests, durability, and strength, and includes electrical tests for protection against corrosion and overcurrent, among other test factors.

Emergency exits and escape routes: All our automatic doors are subject to the strictest safety demands in accordance with EN 16005 (Power operated pedestrian doorsets – Safety in use – Requirements and test methods). For example, the ES PROLINE FST is equipped with a redundant operator, an additional control unit for safety purposes, and a self-monitoring motion detector. Additionally, its magnetic locking system (FIA) combines burglary protection with escape route functionality, ensuring safe exits in emergencies while preventing unauthorized access. In the U.S., we conform to the authorization requirements for unintentional radiators as stipulated in the Code of Federal Regulations (FCC Part 15 Subpart B).

Our **mechanical door hardware** products (mechanical locks and cylinders) comply with key European standards: EN 1303, EN 12209, EN 1906, and EN 15685. These standards collectively cover requirements for performance, durability, security, and corrosion resistance, ensuring that our products meet consistent safety and quality benchmarks across all critical components.

Key & Wall Solutions

Our Key & Wall Solutions business manufactures automated solutions, keys, and space-dividing solutions. Our Key Systems and Movable Walls business units each have individual approaches to customer health and safety that are product specific.

The Key Systems business unit approaches customer health and safety as an element of its ISO 9001 certification and ensures compliance with both mandatory (such as the European CE Declaration of Conformity) and voluntary safety standards. Each Key Systems product features proper technical and compliance documentation, such as user manual; contact details for the manufacturer; quick guides and tutorials available online; and training on demand or during product installation to provide the customer with all relevant information for proper product use and safety features. Regional distributors are periodically trained on the same topics.

Raising awareness of the safe use and installation of our products

Besides certifications and maintaining our exacting processes, we also believe that it is important to efficiently communicate with our partners and customers about the safe installation, operation, and use of our products. We have set the following targets to further minimize any associated health and safety risks. By 2027, we aim to:

- collaborate on health and safety trainings with subcontractors and installation partners,

- collaborate on training and provide information materials on the safe operation of our products to all end users, and
- have at least one corrective action and/or one awareness training session for each product-related injury.

As part of our commitment to these targets, we developed a due diligence strategy in FY 24/25 focused on installers in our supply chain. In the first phase, we identified key risks related to health and safety and labor rights. We also mapped where our installers are located and which departments contract and manage them. To set clear expectations, the Corporate Sustainability team and the Legal department created "**Terms & Conditions for Installers**", which were rolled out in April 2026 on a pilot basis in the U.S. These set out the minimum standards and expectations for all installers engaged in work on our behalf. They cover key requirements relating to working hours, health and safety responsibilities, the protection and supervision of young workers, and compliance with applicable wage and benefit obligations. All installers are expected to follow these requirements, comply with relevant laws and regulations, and maintain safe, professional, and ethical working practices throughout the duration of their engagement. Pending the results of installer's feedback during the pilot, rollout of the Terms & Conditions is planned in other countries.

Marketing and Labeling

Our approach

Marketing and Labeling has been identified as a new material topic in our sustainability strategy, following our comprehensive double materiality assessment. This topic focuses on clear and accurate product labeling, access to reliable and sufficient information, including transparency regarding safety, environmental impacts, and product characteristics. The decision to prioritize this topic stems from risks due to increasing regulatory demands for environment- and health-related product information, reputational risks posed by potential exposure to accusations of greenwashing if product data is not validated, and opportunities related to customer expectations for sustainability documentation required by green building standards.

Product information from EPDs and HPDs can help our customers attain the highest green building certifications, such as Leadership in Energy and Environmental Design (LEED). By providing this level of product information, we seek to lower market entry barriers in the green building industry, enabling our inclusion in related bidding processes. Our product labels and technical documentation are in line with the relevant regulatory requirements.

Our activities

We compile, consolidate, and digitize our sustainability-related data in order to meet future requirements, such as upcoming obligations under the EU's Digital Product Passport (DPP).

We provide transparent information for more than 281 of our products in the form of sustainability-related product declarations. **By 2027, we aim to double our sustainability-related product declarations/certifications, including Cradle to Cradle and for recycled content (baseline 170 in FY 20/21).**

We provide EPDs to disclose the environmental impact of our products across their life cycle, following ISO 14025, 14040, 14044 and EN 15804+A2 standards, to ensure that our environmental information is transparent, reliable, and credible.

Our EPDs are based on life cycle assessments (LCA), which provide a reliable calculation of the environmental performance of a product. Mainly using the cradle-to-gate (with options) approach, LCAs cover the environmental impacts arising during the extraction of raw materials and all the way through the production, distribution, use, and end of life phases, which are quantified based on materials, energy consumption, transportation routes, and emissions, across the life span of the products.

Additionally, our enhanced LCA tool allows for a comparison of Global Warming Potential (GWP) values across different materials, enabling more sustainable decision-making during the design phase. To ensure the active use of this tool it is now part of the EcoDesign Specification Template.

We also offer HPDs and Building Product Declarations (BPDs), depending on local market requirements. Additionally, we offer **recycled content certifications** from Green Circle Certified for nine products. These third-party verifications confirm the use of verified recycled materials, supporting our efforts to reduce resource consumption and promote circularity in our value chain.

Additionally, our **Movable Walls portfolio** has responsible forestry and indoor air quality certifications. These certifications ensure that the wood materials used in our products originate from responsibly managed forests and that the products contribute to healthier indoor air quality by meeting strict volatile organic compounds emissions standards.

We have also continued the **Cradle to Cradle (C2C) certification** process for our TS 98 XEA and ITS 96 door closers, underscoring our commitment to circular product development and the responsible use of materials. The products have been submitted for certification to the respective body under version 5.0, with a target of achieving bronze level due to the presence of lead in certain materials.

In addition, the DGNB (Deutsche Gesellschaft für Nachhaltiges Bauen) Navigator label is being updated and gradually introduced across more product lines, supporting sustainable building certifications and improving transparency — particularly for our customers in Germany.

See our sustainability-related product declarations and certifications on our website.

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Information security

At dormakaba, protecting customer data and securing our digital products are key priorities. We maintain a globally implemented Information Security Management System (ISMS) aligned with ISO/IEC 27001:2022, covering Global IT and digital product development activities. Supported by Group-wide Information Security and Data Protection Directives, our risk-based approach ensures the secure, lawful, and transparent handling of data.

Information security is fully integrated into our risk management framework and supported by regular audits, monitoring, and continuous improvement activities. Robust safeguards are in place to protect confidentiality, integrity, availability, and authenticity of information. Customer data is processed only for legitimate purposes and in accordance with applicable legal and regulatory requirements. In FY 25/26, no confirmed information security incidents involving customer privacy breaches or loss of customer data were recorded.

We continue to strengthen our security posture in line with evolving regulatory requirements, including the EU Cyber Resilience Act (CRA) and the NIS2 Directive.

Our Information Security Management System helps safeguard our customers' rights to data protection and privacy.

[ESG Performance Table](#)