



**dormakaba** 

## **Joint Modern Slavery Statement 2023 / 2024**

**dormakaba Holding Australia Pty Ltd ABN 82 005 869 447**  
**dormakaba Australia Pty Ltd ABN 14 067 969 466**

Date: 10 December 2024

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## 1 INTRODUCTION

This is a Joint Modern Slavery Statement (**Statement**) made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) on behalf of:

- (a) dormakaba Holding Australia Pty Ltd ACN 005 869 447(**dormakaba Holding**); and
- (b) dormakaba Australia Pty Ltd ACN 067 969 466 (**dormakaba Australia**).

dormakaba Holding and dormakaba Australia are Reporting Entities as defined by the Act.

dormakaba Holding and dormakaba Australia acknowledge the importance of the Act and appreciate the Act's contribution to eradicating modern slavery. dormakaba Holding and dormakaba Australia also acknowledge their responsibility for respecting human rights in their operations and supply chains as outlined in the United Nations Guiding Principles on Business and Human Rights (**UNGP**).

dormakaba Holding and dormakaba Australia are fully committed to adhering to the policies of the broader dormakaba Group. These policies cover human rights, modern slavery and business ethics.

This Statement outlines the steps taken by dormakaba Holding and dormakaba Australia in the 2023-2024 financial year (the relevant reporting period) to understand, address and minimise the risks of modern slavery occurring in its supply chains, or in any part of its business, and update on the progress since its previous statement.

## 2 STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### 2.1 Structure

dormakaba Holding AG (**dormakaba Group**) is a global security group headquartered in Rümlang, Switzerland. The dormakaba Group employs approximately 16,000 people in over 50 countries and is publicly traded on the SIX Swiss Exchange.

dormakaba Holding is part of and wholly owned by the dormakaba Group. dormakaba Holding has eight related entities that operate in each Australian State and Territory. The controlled entities employ approximately 1,000 people.

dormakaba Australia is one of the entities owned and controlled by dormakaba Holding. dormakaba Holding and dormakaba Australia's head office is located at 12 – 13 Dansu Court, Hallam Victoria.

dormakaba Holding and dormakaba Australia are both members of the broader dormakaba Group. Accordingly, references in this Statement to dormakaba Group are to both dormakaba Holding and dormakaba Australia.

### 2.2 Operations

dormakaba Group is a leader in the global access solutions market with over 160 years' experience. The dormakaba Group has an extensive portfolio and strong brands enabling it to offer customers products, solutions and services for anything related to access to buildings and rooms from a single source.

dormakaba Group's organisational structure is divided into five global segments. dormakaba Holding operates in two of these segments:

- (a) Access Solutions Market Pacific; and

(b) **Key and Wall Solutions (globally focused).**

The Access Solutions segment includes all hardware and software components and products for access solutions and relevant services. The portfolio ranges from door technology solutions, automatic door systems to fittings, closers, stoppers and locking systems.

In Australia, the Key and Wall Solutions segment specialises in partitioning systems with two product groups: Acoustic Movable Partitions (both vertical and horizontal) and Glass Horizontal Sliding Walls.

dormakaba Holding's operations includes the provision of goods and services within the Access Solutions and Key and Wall Solutions segments. Specifically, the entities controlled by dormakaba Holding (including dormakaba Australia) research, develop, manufacture, purchase, warehouse, market, sell and distribute goods (such as doors, automatic door operators, door handles, door seals etc) for the purposes of fulfilling its business objectives within the Access Solutions and Key and Wall Solutions business units.

Further, companies controlled by dormakaba Holding directly employ persons for the purposes of delivering these goods and services as well as engaging independent contractors from time to time. Independent contractors are engaged for reasons such as expertise and variable work demands.

### 2.3 **Supply Chain**

The supply chains for companies controlled by dormakaba Holding (including dormakaba Australia) include both internal and external suppliers. dormakaba Group has its own manufacturing facilities across all continents with a significant footprint in Asia, Europe and America.

Internal suppliers and their supply chains are bound by dormakaba Group policies and procedures outlined in this Statement. External suppliers provide dormakaba Group with a variety of finished goods used in the assembly and manufacturing processes. Finished goods include electric latches, electronic sensors and door hardware items.

dormakaba Group takes steps to communicate the requisite standards on responsible labour with high-risk suppliers.

## 3 **RISKS OF MODERN SLAVERY PRACTICES**

The dormakaba Group controls many of the relevant processes and policies for the purposes of assessing and addressing modern slavery risks. Consequently, the dormakaba Group has identified some of the risks that exist within the operation and supply chains of the Group as a whole.

As per the dormakaba Statement of Commitment on Human Rights, the dormakaba Group is committed to assessing and addressing the risks associated with modern slavery such as child labour, and the risks that arise from outsourced labour services.

## 4 **ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS**

In addition to the matters raised in the dormakaba Group's previous modern slavery statements, the dormakaba Group has implemented a range of key training and workshop initiatives to spread awareness on risk identification and mitigation and target certain groups within its operations who have relevant nexus to modern slavery risks. This has resulted in more than 150 dormakaba employees being trained on human rights topics. In addition, 6 Audits were conducted in dormakaba's own operations and an additional 6 Audits conducted in high-risk suppliers. These resulted in 12 corrective action plans being developed as a result of the audits.

dormakaba Group has further enhanced its resources surrounding modern slavery risks with assigned roles and risk management systems to support the monitoring of human rights' risks in its operations.

dormakaba Group understands the importance of monitoring high risk suppliers in its operations. For example, dormakaba Group has commissioned an external and globally recognised auditing firm 'Elevate' to undertake audits of high-risk suppliers.

We outline these key endeavours below.

#### 4.1 Human Rights Specialist

dormakaba Group strives to build the capacity of the functions and the overall organization to identify and manage human rights risks and violations. To support this intention, dormakaba Group has a dedicated Human Rights Specialist who continuously works on building the capacity of high-risk sites and relevant functions through regular calls to ascertain the progress made at a local level, workshops on specific topics, and general counselling.

The Human Rights Specialist is in continuous contact with local managers, who receive one-to-one support and capacity building. Their feedback is reviewed at group level for the development of the Modern Slavery Statement as well as the risk management policies.

#### 4.2 HRRM System

To assist with the identification of risks, dormakaba Group has also designed and implemented a Human Rights Risk Management System (**HRRM System**) that allows for the systematic identification and prioritisation of the human rights risks present in its own operations. This was implemented following the requirements of the German Supply Chain Due Diligence Act.

The HRRM System considers internal and external social Key Performance Indicators (**KPIs**). These range from country risk indexes provided by Verisk Maplecroft to working hours records, whistleblowing reports and injury incident rates.

The HRRM System is used by dormakaba Group to identify and prioritise human rights risks across its operations. The KPIs used in this system enable dormakaba Group to classify sites into a four-level risk scale between extreme, high, medium and low risk. Each KPI is weighted based on the likelihood, scope, severity, and ability for remediation of the associated human rights risks, and a final risk score is derived for each site.

This risk classification is used as a basis to prioritise sites for additional due diligence measures, such as:

- on-site auditing cycles;
- mandatory training tailored to the risks identified; and
- one-to-one support.

The risk scores are updated on an annual and event-based basis.

#### 4.3 Policies

The following table outlines the policies and procedures as relevant to this Statement:

Document	Summary
Code of Conduct	<ul style="list-style-type: none"> <li>• The Code contains core values and principles, guidelines and requirements specifically relating to</li> </ul>

Document	Summary
	human rights, modern slavery, forced labour and compliance with all applicable laws and regulations.
Statement of Commitment on Human Rights	<ul style="list-style-type: none"> <li>• The Statement of Commitment on Human Rights recognises the important role in respecting human rights in accordance with the UNGP framework of 'Protect, Respect, Remedy'.</li> <li>• The Statement outlines dormakaba Group's commitment to supporting and respecting human rights as outlined in the Code of Conduct.</li> </ul>
Supplier Code of Conduct	<ul style="list-style-type: none"> <li>• The Supplier Code of Conduct (<b>SCoC</b>) outlines the minimum requirements with regards to human rights, fair working conditions, environmental responsibility and business ethics.</li> </ul>
Group Directive Responsible Labor	<ul style="list-style-type: none"> <li>• This Directive lays out obligations and procedures in areas such as freely chosen employment, working hours, wages and benefits and humane treatment, including a ban on employing people below the age of 15.</li> </ul>
Statement of Commitment on Responsible Minerals Sourcing	<ul style="list-style-type: none"> <li>• This Statement acknowledges our responsibility to take action to increase transparency or our mineral supply chain, and in particular potential human rights violations during the mining of certain minerals,</li> </ul>

#### 4.4 Sustainable Procurement Directive

The Sustainable Procurement Directive aims to support and facilitate the purchase of products and materials that minimise the harmful effects to the environment from their production, use and disposal.

The overarching objective of the Sustainable Procurement Directive is for dormakaba Group to leverage its purchase power to (a) benefit the partners whose values align most closely with its; and (b) make more sustainable choices in the goods procured.

#### 4.5 Responsible Procurement Directive

To accompany the roll-out of the Directive on Responsible Procurement in the financial year for 2023-2024, dormakaba Group launched a training module that conveys the new processes and standards established by this directive in an accessible manner.

Similarly, after the publication of the Statement of Commitment on Responsible Sourcing of Minerals, dormakaba Group launched dedicated training that delves into the intricacies of the supply chains of high-risk minerals.

This training addresses the human rights risks and violations that are prominent in supply chains of minerals such as the conflict minerals and cobalt, child labour, forced labour, and conveys the main elements of the dormakaba Group's strategy to mitigate those risks.

It is a mandatory requirement that dormakaba Group's procurement leadership team complete the training, in addition to dormakaba Group's category managers, who deal with material object codes related to high-risk minerals.

#### 4.6 Responsible Labor Directive

dormakaba Group continues to monitor adherence to the Responsible Labor Directives on an annual basis via an off-site assessment, "Statement of Adherence to dormakaba's Responsible Labour Standards."

Underpinning the Responsible Labor Directive is dormakaba Group's commitment to the support and respect of human rights for all people. dormakaba Group recognises that responsible employment and recruitment is critical to the protection of workers and their human rights.

#### 4.7 Zero Recruitment Fees Directive

dormakaba Group recognises that responsible employment and recruitment (including associated fees and costs) is critical to the protection of workers and their human rights. The Zero Recruitment Fees Directive regulates business standards regarding fees and costs associated with recruitment.

The overarching principle is that workers shall not be required to pay fees in connection with their employment, including application, recruitment, hiring, placement or processing fees.

To strengthen the impact of the Zero Recruitment Fees Directive, dormakaba Group has developed a training program for labor agents in both sending and receiving countries to ensure adherence to responsible recruitment practices. These training modules focus on the fundamental principles of responsible recruitment, emphasizing ethical practices aligned with international standards. The module also includes detailed guidance on the Group's zero recruitment fees policy, ensuring that workers are not charged for securing employment, as well as the reimbursement process to address any unauthorized fees incurred. By equipping labor agents with this knowledge, the company reinforces its commitment to eradicating modern slavery and promoting fair and ethical labor practices throughout its supply chain.

#### 4.8 Supply Chain Awareness

In pursuing dormakaba's commitment to contribute to enabling positive change in global supply chains, the dormakaba Group launched a training project in April 2024 to deliver finance training to high-risk suppliers per month. The training is provided by Elevate via the EIQ platform, which delivers modules on human rights and environmental risk management in an accessible manner – including with case studies and practical examples of actions to be taken.

These training modules are available in several languages. Since the launch of the project in April 2024, 221 suppliers have been invited to complete the training modules. Further, the completion of these training modules constitutes a mandatory corrective action for the selected suppliers. Accordingly, if the suppliers will face escalation processes and could be off-boarded if they fail to participate in the project.

#### 4.9 Auditing

dormakaba Group is aware of the importance of identifying high risk suppliers and taking action to assess and address the risks they present.

In FY 23/24], dormakaba Group commissioned an external agency 'Elevate' who is a renowned global auditing firm to audit specific high-risk suppliers.

Specifically, in FY 23/24 Elevate completed:

- six on-site audits on dormakaba plants; and
- six on-site audits on sub-contractors in China,(2) Malaysia (1) and Taiwan (3).

EcoVadis surveyed a further 163 high risk suppliers,

Internally, dormakaba Group supports its audit teams to have access to key training regarding modern slavery risks. In FY 23/24, dormakaba Group's quality team conducted on-site audits for 11 suppliers in China. There were no findings of non-conformance regarding sustainability criteria.

#### 4.10 General risk assessments and commitments

dormakaba Group has established a Sustainability Framework for 2021 to 2027, which contains specific targets to address high risk suppliers. Specifically, this framework contains 'Supplier Sustainable Development' as a strategic topic, which includes several targets focused on supplier activity with the aim for these targets to be achieved by 2027.

Some of these targets include:

- 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.

Further, to ensure dormakaba Group's suppliers contribute to social and environmental well-being, dormakaba Group focuses on five areas:

1. Identifying supply chain risks
2. Supplier off-site assessments
3. Supplier on-site audits
4. Training of internal and external stakeholders
5. Procedures in case of non-participation or non-compliance

#### 4.11 Training

dormakaba Group developed a range of trainings, workshops and e-learnings to further spread awareness on human rights risks across the group's internal operations and supply chain and enable both its employees and suppliers to understand how to identify and mitigate human rights risks.

We summarise these initiatives below.

##### Human Rights Good Practices Hub

In FY23/24, dormakaba developed the Human Rights Good Practices Hub (**HR Hub**). The HR Hub serves as a one stop shop for local managers where they find information about the Group's human rights standards and applicable regulations, lessons learned from their peers and readily available assets to communicate and fulfil specific obligations.



## Human Rights Workshop

In FY23/24, all members of the international auditing team and the supplier quality auditing team attended a mandatory training workshop to learn how to identify potential risks or violations of human rights in the course of their regular auditing work.

The mandatory training was delivered in connection with dormakaba's intention to build the capacity of its functions and the organisation more broadly to:

- (a) identify and manage human rights risks and violations; and
- (b) raise awareness and increase the knowledge amongst relevant functions in the organisation.

The training session was delivered by Focus Right, a consultancy firm specialising in human rights and corporate social responsibility. The content included case studies, role plays and the dissemination of practical resources to identify and communicate human rights risks and violations.

## E-Learning

In FY23/24, dormakaba Group developed an eLearning module that addresses the requirements for ethical recruitment processes. This training includes coverage over the following topics (this is a non-exhaustive list):

- freely chosen employment;
- zero recruitment fees; and
- mandatory pre-departure information.

The aim of this training is to protect prospective migrant workers and reduce their risk of being caught in situations of forced labour.

This training is due to launch in early FY24/2025.

## 5 ASSESSMENT OF ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

The dormakaba Group has also taken steps to evaluate the effectiveness of some of its actions to assess and address modern slavery risks.

The dormakaba Group has procedures and process flows in place for auditing rules and corrective action plans in terms of sustainability and performance of suppliers.

dormakaba Group engages a leading provider EcoVadis to assist the monitoring of suppliers, reduce supplier risk and support supplier development.

In the 23/24 financial year, dormakaba Group engaged approximately 544 high risk suppliers to participate in a third-party off-site assessment by EcoVadis, which covers 21 sustainability criteria across four key areas being environment, labour and human rights, ethics, sustainable procurement.

Of the suppliers with a completed rating as at 30 June 2024, 60% landed in the score band of "good" or above.

Since the commencement of dormakaba's cooperation with EcoVadis, 31.7% of high risk suppliers have been assessed. 825 high priority corrective actions have been requested and 9% of these have been closed.

Considering its strategy to audit suppliers considered high-risk, and as explained in previous sections, dormakaba Group has audited six of its subcontractors in countries considered to be high-risk. All initial audits are followed by a root cause analysis undertaken by a specialized third party, who also designs tailored corrective action plans. After each audit, dormakaba receives the audit reports, the root cause analyses and the corrective action plans. It then supports the suppliers in achieving improvements before the closure audit takes place.

Apart from the off-site and the on-site assessments, dormakaba is allocating substantial efforts into building the capacity of its high-risk suppliers for them to learn how to manage risks to human rights in their own operations and supply chains. It is for that purpose that the company tracks the completion rate of the different training modules that are offered to suppliers.

## **6 CONSULTATION WITH ENTITIES OWNED OR CONTROLLED**

dormakaba Group consults with its related entities when drafting and introducing policies and procedures that are applicable and / or relevant to the Group. For example, dormakaba Group consulted dormakaba Holding in the development of the Responsible Labor Directive.

Training packages are also developed for some policies where completion is tracked using dormakaba Group systems and software.

The recent integration of the Human Rights Specialist also supports consultation of modern slavery risks identified across dormakaba Group's operations. For example, it enables ongoing contact with local managers across the group and feedback is obtained for consideration at the group level.

The engagement efforts include regular calls with the management teams of sites identified as high-risk, fostering direct engagement and focused discussions on mitigating region-specific challenges. Additionally, the management teams of different regions actively participate in the risk management process, ensuring a coordinated and comprehensive approach. Medium to high-risk sites are required to complete annual self-assessment questionnaires, enabling the group to monitor compliance, identify emerging risks, and evaluate the effectiveness of mitigation measures. These combined efforts ensure consistent alignment with the group's global human rights standards and a proactive approach to safeguarding human rights across the organization's operations.

## **7 OTHER RELEVANT INFORMATION**

dormakaba Group continues its commitment to shaping a more sustainable industry and future through its ongoing implementation of its Sustainability Framework 2021-2027.

For the third time, EcoVadis has awarded dormakaba Group a gold medal for its sustainability rating. This places dormakaba Group among the top 5% of more than 130,000 organisations assessed worldwide.

The EcoVadis evaluation is based on a comprehensive catalogue of questions. The results of the criteria surveyed are grouped into four topic categories: environment, labour and human rights, ethics, and sustainable procurement. This year, dormakaba achieved an overall score improvement and has shown an advanced performance in all four assessed categories.

In addition to dormakaba Group's internal and supplier-focused human rights initiatives, dormakaba Group also collaborates with external agencies to further spread awareness and champion change in the protection of human rights.

In a landmark project, dormakaba Group has joined forces with Save the Children Switzerland and the Centre for Child Rights and Business (**the Centre**) to address the pervasive issue of child labor in small-scale mining communities in the Democratic Republic of Congo (**DRC**).

dormakaba Group has committed to this project for ten years with a focus to support affected children and young people in mining centers in the DRC with the aim to provide long-term remediation.

By collaborating closely with local organisations and practitioners, the external partners such as the Save the Children and the Centre – ensure that the interventions are culturally sensitive and more likely to succeed. This community approach leverages local knowledge and expertise while fostering the creation of a network of support that assists current victims, but also prevents future children from falling into the same circumstances.

dormakaba Group is committed to furthering the impact of this initiative by encouraging other companies that utilise cobalt to join the initiative, thus driving broader change and contributing to the fight against child labor in cobalt supply chains on a larger scale.

## 8 CONCLUSION

The dormakaba Group is dedicated to continuous improvement, which includes continuing to assess and address the risks of modern slavery within its business operations and supply chains. The implementation of a dedicated Human Rights Specialist is a key example of dormakaba Group's intention to progress its commitment to expand its existing framework and assess and address modern slavery risks. The dormakaba Group is also dedicated to ensuring that the framework and policies created by the Group are appropriately communicated to and observed by the entities it controls.

The dormakaba Group is committed to building on this approach in the coming years in view of its responsibilities as a good corporate citizen.

## 9 APPROVAL

This Statement is made pursuant to section 14(1) of the Act and constitutes a mandatory joint modern slavery statement on behalf of dormakaba Holding Pty Ltd and dormakaba Australia Pty Ltd for the reporting period of the 2023-2024 financial year. This Statement has been approved by the principal governing body of both dormakaba Holding Pty Ltd and dormakaba Australia Pty Ltd on 9 December 2024. This Statement is signed by Christopher Goodall as Director/Senior Vice President Market Australia and New Zealand and Rowan Brittain as Company Secretary/Deputy Vice President Finance Market Australia and New Zealand on behalf of dormakaba Holding Pty Ltd and dormakaba Australia Pty Ltd:



Christopher Goodall  
Director, dormakaba Holding Australia Pty Ltd  
Director, dormakaba Australia Pty Ltd  
Date: 10 December 2024



Rowan Brittain  
Company Secretary, dormakaba Holding Australia Pty Ltd  
Company Secretary, dormakaba Australia Pty Ltd  
Date: 26 June 2023

