



### **Policy Title**

Global Human Rights Policy

### **Effective Date**

May 2018; updated October 2024; updated May 2025

### **Distribution and Storage**

This policy will be made available to all employees and members of the public. This policy shall be stored on The Grid in the policies section and on the Allegion website.

### **Scope**

This Policy is developed in line with the UN Guiding Principles on Business and Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work along with the OECD Guidelines for Multinational Enterprises. Allegion is committed to respecting internationally recognized human rights as they are relevant to our operations.

### **Policy Purpose**

Allegion respects human rights. This policy, in combination with Allegion's Code of Conduct, Business Partner Code of Conduct and Annual Statement on Modern Slavery, sets out Allegion's primary expectations for employees and our business partners in identifying, preventing and mitigating adverse human rights impacts resulting from or within our business activities by using due diligence and mitigation processes.

### **Policy and Procedures**

#### **A. Human Rights Impacts**

Allegion recognizes that we must take steps to identify and address any actual or potential adverse impacts in which we may be involved, directly or indirectly through our own activities or our business relationships. We manage these risks by integrating responses to our due diligence into our policies and internal systems, acting on findings, tracking our actions, and communicating with our stakeholders about how we address impacts.

We understand human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or when our operating conditions change, as these changes may create new potential or actual impacts on human rights. Allegion expects all employees to:

- Make respect for human rights part of the way you work. In other words, walk the talk. Keep human rights at the core of your regular team meetings and display, through your own behavior, what “respect” looks like.
- The Global Human Rights Policy applies both within and outside Allegion facilities. When engaging with suppliers, customers and communities, apply the same standards that you would apply with your colleagues.
- For any new business process, acquisition due diligence or activity, look at it from a human rights view. The best way to avoid human rights infringements is to ensure that human rights are considered early and kept in focus during the process, acquisition or activity.
- If you are involved in Supply Chain or engage with any vendor, ensure that you are following Allegion’s Business Partner Code of Conduct, which is also aligned with this Policy.
- Human rights risks can appear in any country and in any context. Human rights are dynamic and operations may inadvertently impact rights both internal and external to the Company. We ask everyone to pay attention to potential risks and report them to the Ethics HelpLine.
- If a complaint is made to you, especially from a customer, supplier or employee, take it seriously and report it to Ethics & Compliance.
- Encourage your team to be alert to human rights risks, and foster an environment where those concerns can be freely and immediately shared and addressed appropriately.

*Forced Labor and Human Trafficking* Allegion prohibits the employment of forced, compulsory, bonded (including debt bondage) or indentured labor. The required notice period for workers to terminate their contracts shall be based on local best practices as applicable by local law, and once they have begun working, workers shall not be penalized for early termination of their employment contract upon giving the required notice, although employees may be required to pay the damages to employers in certain circumstances according to the local applicable laws. The notice period shall be waived in situations where the worker has suffered harassment or abuse, or is a victim of trafficking.

Allegion prohibits workers from being charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel in cases of relocation, processing official job-related documents and work visas. In cases of relocation, Allegion provides workers with return transportation to their country of origin, or compensation for the cost of return transportation, upon completion of their employment contract.

Allegion prohibits the holding or otherwise destroying, concealing, confiscating or denying access of employees to their identity or immigration documents. Allegion prohibits the use of recruiters that do not comply with local labor laws. Recruiters must be certified or licensed by the competent authority in their country of operation, must not charge recruitment fees, must use only trained employees, and must not engage in fraudulent recruitment practices.

Allegion requires that employees be provided with employment contracts in writing in a language the employee understands. Workers with difficulty understanding the written contract shall be provided with a verbal explanation. If the employee must relocate for work, Allegion requires that the employment contract be provided to the employee in advance of relocation.

*Child Labor* Allegion prohibits employment of workers younger than the local, legally required minimum age. In the absence of local law, Allegion and our business partners shall not employ children under the

age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, shall not employ workers under the age of 14. Allegion prohibits child labor, which is work that is physically, socially or morally dangerous and harmful, that deprives children of an education, or requires a child to combine education with long hours and heavy work.

*Work Hours, Wages and Benefits* Allegion compensates employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

#### B. Safety and Anti-Violence

Allegion values a safe work environment. Threats, acts of violence and physical intimidation are strictly prohibited. No talk of violence or joking about violence will be tolerated.

#### C. Inclusive Culture

Allegion has and aims to sustain a high-performing and inclusive culture, which is underscored by our values like “do the right thing” and “celebrate who we are”. Diversity is valued in all aspects of our business, as we strive to create a workplace where all people feel welcomed, respected and valued. We believe attributes like talent, character, ability and integrity are well-distributed and, therefore, opportunity should be as well. Each of us is responsible for creating a culture of trust and respect that promotes a positive and inclusive work environment.

#### D. Community Engagement

Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company and our various charitable donations, through which we seek to promote respect for human rights.

#### E. Responsible Sourcing

As a global company, Allegion’s business transactions cross many borders. Allegion is committed to engaging in reasonable due diligence and screening of suppliers and distributors to ensure compliance with laws that regulate international trade, and committed to working with our business partners to mitigate any identified risk. We will do so through a range of different approaches, including:

Annual internal assessment of supply chain risk based on international indices, supplier performance and other indicators of supplier-specific risks.

- Annual supplier self-assessment campaign audits
- Internal audit of supplier sites showing high risk with the HTRT risk or supplier sites demonstrating known risk factors for human trafficking
- New supplier screening, on-site-assessments (OSA) and qualification
- Long-term supplier relationships and approved supplier lists (ASL)
- Supplier scorecards and supplier business reviews
- Contract language

Violation of the Business Partner Code of Conduct or our Human Rights Policy may result in termination of the supplier relationship and/or reporting of the misconduct to the relevant authorities.

#### F. Public Reporting

Under the requirements of multiple modern slavery reporting requirements, and consistent with this Human Rights Policy, Allegion reports to the public on our human rights-related commitments, efforts and statements.

#### G. Reporting Concerns

At Allegion, we're committed to doing the right thing and speaking up for what's right. When we do, we create an environment where everyone's voice is heard. By listening to your concerns, we are better able to identify and promptly resolve any issues that could violate our Human Rights Policy or the law. For that reason, we encourage you to come forward any time you have questions about this policy or any other concern. And if you see or suspect a violation of our Human Rights Policy or the law in connection with your work with Allegion, we expect you to come forward and share them with us.

Allegion has many resources available when you need help or want to report a concern. You may share your concern via:

- Email

[EthicsandCompliance@allegion.com](mailto:EthicsandCompliance@allegion.com)

- Mail

Chief Compliance Officer

Allegion plc

11819 N. Pennsylvania Street

Carmel, Indiana 46032

United States of America

- Our Ethics HelpLine

This service is available to you 24/7 and is operated by an independent organization. You may submit your report anonymously, where permitted by law. The Ethics HelpLine is accessible:

BY PHONE In the U.S. and Canada, call toll-free, 800-461-9330

ONLINE [allegion.com/helpline](https://allegion.com/helpline)

Allegion handles all reports fairly and discreetly. We also investigate them promptly. We only disclose report information to those who need to know in order to investigate and resolve the issue.

#### *No Retaliation*

Allegion strictly prohibits retaliation against anyone who reports an issue in good faith.

#### **Policy Owner**

The Policy Owner is the Chief Compliance Officer within the Compliance Department. Questions, comments or issues should be directed to [ethicsandcompliance@allegion.com](mailto:ethicsandcompliance@allegion.com). The Policy Owner shall have accountability for all aspects of the policy including publication, updates and training on the given policy.

#### **Policy Review**

This Policy will be reviewed periodically.

#### **Policy Disclaimer**

The terms of this Policy may be amended, modified or terminated at any time, with or without prior notice. This version of the Policy supersedes all prior versions of the Policy. Nothing in this Policy creates a contract of employment or any contractual obligation, express or implied, to an employee or employees. Interpretations of this Policy are within the exclusive jurisdiction of the Company. This Policy may provide benefits the same or similar to those provided in other policies or guidelines. To the extent that occurs, the policies or guidelines will be read together so as not to provide duplication of benefits to any employee or group of employees. Nothing in this Policy limits or modifies the terms of applicable Collective Bargaining Agreements or limits the ability to enter into Collective Bargaining Agreements.

#### **Violations of the Policy**

Violations of this policy will be subject to discipline up to and including termination of employment.