



February 1, 2022

One of Daikin's highlights has been its continual global business expansion and the talented group of people who make up the Daikin Family. As a multinational company that has been expanding its operations in every region of the world, we must implement strategies and policies from a global point of view that represent the highest standards of ethics, integrity, and transparency along with our commitment to conduct our business ethically.

At Daikin, we want people to be proud to work with and for our company as global No.1 HVAC solution provider. We have a global footprint and face a multitude of local business cultures, laws, and regulations. However, our values remain constant, and our integrity shall never be compromised. We have high expectations that company, our employees, representatives, and vendors will comply with external and internal regulations and practice the highest standards of business conduct and ethics, whether in dealings with each other, the company, the community, or with customers, business partners, or competitors.

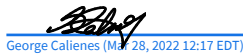
As part of our commitment to keep the highest ethical standards, we present this Code of Business Conduct and Ethics, in which you will find information regarding Conflict of Interest, Corporate Opportunities, Competition and Fair Dealing, Entertainment, Gifts and Invitations, among others. We expect that you will review, acknowledge, and follow our Code of Business Conduct and Ethics, and related compliance policies. If you have questions concerning this Code of Business Conduct and Ethics, please consult your supervisor, your local Human Resources representative, the Compliance Department, or Daikin Applied Integrity Hotline or through the Speak up for Daikin system. Daikin is committed to fostering an environment that supports open communication and trust.

As we focus on continued growth and serving our customers, remember that integrity starts with you and me; the choices each of us makes and actions we take to win right. Thank you for doing your part. Because at Daikin, we believe that Compliance is as essential as the air we breathe.

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Andres Benavides
Plant Director
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CODE OF BUSINESS CONDUCT AND ETHICS DAIKIN LATIN AMERICA

1. PURPOSE

Daikin Applied Americas, Inc and its subsidiaries and affiliates throughout Miami, FL, and Latin America including Daikin Applied Latin America, LLC and all entities of SAEG International Group, Inc. (hereinafter referred to as “DALA”), together with Daikin Airconditioning Mexico, S. de R.L. de C.V. (“DAMX”), Daikin Manufacturing Mexico, S. de R.L. de C.V. (“DMMX”), Grupo CYVSA, S.A. de C.V and all entities and affiliates of Grupo CYVSA, S.A. de C.V. (“CYVSA”), Daikin AR Condicionado Brasil Ltda (“DABR”), Daikin Ar Condicionado Amazonas Ltda (“DAM”), and Daikin Air Conditioning Argentina Sociedad Anonima (“DARG”) and all together referred as “Daikin Latin America” or the “Company” will strive, at all times, to conduct its business in an ethical, socially responsible and safe manner and in compliance with all applicable laws and regulations.

This Code of Business Conduct and Ethics (the “Code”) sets forth legal and ethical guidelines, which promote the conduct of our business in accordance with the highest standards of integrity. This Code is a guide only and does not constitute a comprehensive or complete explanation of the laws that apply to you and Daikin Latin America.

Company directors, officers and employees, all referred to hereinafter as “Company employees” or simply “employees”, must maintain a workplace environment that stresses commitment to compliance with this Code and with applicable laws and regulations. It is your duty to encourage ethical behavior by acting with a high level of integrity, helping to create a safe environment, and ensuring the Company employees are informed of and adhere to all applicable laws, regulations, policies, and procedures.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. Company reserves the right to amend, supplement or discontinue this Code without prior notice, at any time. All Company employees have a continuing obligation to familiarize themselves with applicable law and Company policy as set forth in **Daikin Industries, Ltd. Group Conduct Guidelines** at <https://www.daikin.com/csr/company/idea.html#chap05>.

Violations of this Code may result in discipline, up to and including termination of employment and, in some cases, disclosure to appropriate law enforcement officials.

2. SEEKING HELP AND INFORMATION

This Code is not intended to be a comprehensive rulebook and cannot address every situation that employees may face. In the event any employee feels uncomfortable about a situation or has any doubts about whether it is consistent with the Company’s ethical standards, the employee should seek help.

We encourage employees to first contact their supervisors for help. If a supervisor cannot answer a particular question or if an employee does not feel comfortable contacting a supervisor, the employee may contact the Human Resources Department or the Compliance Department.

In the case of DALA, DMMX and CYVSA, however, the employee can also contact the Daikin Applied Integrity Hotline, a web-based and telephone-based support platform for reporting ethical issues, which is administered through an independent company, EthicsPoint, Inc. and if desired, the employee can remain anonymous. Access to reports through this platform will only be available to a specific group of employees within the Company who are responsible for evaluating the report, depending on the type of violation and the location of the incident. Additionally, all reports are confidential.

The Daikin Applied Integrity Hotline (*Daikin Applied Integrity Hotline*) can be accessed via website, **InsideDAIKIN**, **myADP** homepage, or by telephone:



- www.daikinapplied.ethicspoint.com
- <https://daacloud.sharepoint.com>
- <https://my.adp.com/static/redbox/login.html>
- United States (USA) and Puerto Rico – 1.855.243.3149
- Chile – 800 914 709
- Colombia – 1 800 5189932
- Dominican Republic – 1 (809) 200-1073
- Mexico – 800 099 0721
- Peru – (0800) 78145
- Panama – from an outside line dial the direct access number from your location:
 - Panama – 800-0109
 - Panama – 800-2288at the English prompt, dial 855-243-3149

In the case of DAMX, DABR, DAM and DARG, the employee can also access the website www.speakupfordaikin.com which is an online support platform for reporting ethical issues, and which is managed through an independent company, Ethics Global, and if the employee wishes, he/she can remain anonymous. Access to reports through this platform will only be available to a specific group of employees within the Company who are in charge of evaluating the report, depending on the type of violation and the location of the incident. Additionally, all reports are confidential.

In addition, the following toll-free telephone numbers can be reached for these purposes:

- Mexico: 800-04-38422
- Brazil: 800-8923-3928
- Argentina: 0800-345-5478

3. REPORTING VIOLATIONS OF THE CODE

All employees have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations, or policies that apply to the Company. If an employee knows of, or suspects a violation of this Code, the employee should immediately report the situation to a supervisor. The supervisor will contact the Human Resources Department, which will work with the employee and the supervisor to investigate the situation. If the employee does not feel comfortable reporting the situation to a supervisor or does not get a satisfactory response, the employee may contact the Human Resources Department or the Compliance Department directly. If an employee who wishes to remain anonymous and as applicable for each organization can contact the Daikin Applied Integrity Hotline or make use of *Speak up for Daikin* and the different options to submit a report through this system.

Every report of known or suspected violations involving the accuracy of the Company's financial reports and related matters should be reported either directly to the Board of Directors or the Daikin Applied Integrity Hotline (*Daikin Applied Integrity Hotline*) or through *Speak Up for Daikin*.

Every report of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Each supervisor, the Human Resources Department, the Legal Department, the Compliance Department, the Board



of Directors, and the Company will protect every employee's confidentiality to the extent possible, consistent with law and the Company's need to investigate the matter.

It is the Company policy that any employee who violates this Code will be subject to appropriate discipline, which may include termination of employment for cause. This determination will be based upon the facts and circumstances of each particular situation. An employee accused of violating this Code will be given an opportunity to present their version of the events at issue prior to any determination of appropriate discipline. Employees who violate the law or this Code may expose themselves to substantial civil damages, criminal fines, and prison terms.

The Company may also face substantial fines and penalties and may incur damage to its reputation and community standing. The conduct of each employee, as a representative of the Company, can result in serious consequences for both the employee and the Company if applicable laws or this Code are not complied with and followed.

4. POLICY AGAINST RETALIATION

NO DISCIPLINARY OR OTHER RETALIATORY ACTION WILL BE TAKEN AGAINST ANYONE REPORTING IN GOOD FAITH REGARDING A SUSPECTED VIOLATION OF LAW, POLICIES OR THIS CODE.

The Company strictly prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations of applicable law or this Code. Anyone engaging in reprisal or retaliation against an employee who, in good faith, sought help or filed a report will be subject to disciplinary action, including possible termination of employment.

5. PRODUCT AND SERVICE SAFETY AND QUALITY POLICY

The Company has built its reputation by providing products and services of unsurpassed quality and safety. Our products and services are subject to laws, regulations and guidelines issued by the various Industry Associations around the world related to the safety and performance of HVAC products and services. We will comply with these laws, regulations, and guidelines issued by such Associations and may even set higher business standards for safety, performance, durability, maintenance, or appearance for our products and services. To assist in that pursuit, any employee should immediately contact a supervisor, the Vice President of Quality, the Legal Department, or anonymously use the Daikin Applied Integrity Hotline(Daikin *Applied Hotline*) or *Speak up for Daikin* to report any security concerns. or quality that is observed in our products.

6. WAIVERS OF THE CODE

Waivers of this Code will be granted only in extraordinary circumstances. Waivers of this Code for employees may be made only by the Chief Executive Officer, Senior Vice President of Finance, or General Counsel. Any waiver of this Code for directors, executive officers or other principal financial officers must be made by the Board of Directors or its appropriate committee and may be disclosed to the public if required by applicable law.

7. CONFLICTS OF INTEREST

7.1. Identifying Potential Conflicts of Interest

A conflict of interest can occur when an employee's private interest interferes, or appears to interfere, with the interests of the Company as a whole. Employees should avoid any private interest that influences their ability to act in the interests of the Company or that make it difficult to perform their work objectively and effectively. Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples:

- Improper Personal Benefits. No employee should obtain any improper personal benefits or favors because of their position with the Company.



- **Financial Interests.** No employee should have a significant financial interest in any company that is a material customer, supplier, or competitor of the Company. A “significant financial interest” means: (i) ownership of greater than 1% of the equity of a material customer, supplier, or competitor, or (ii) an investment in a material customer, supplier or competitor that represents more than 5% of the total assets of the employee.
- **Loans or Other Financial Transactions.** No employee should obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, any company that is a material customer, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions in the ordinary course of business for such entity.
- **Actions of Family Members.** The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee’s objectivity in making decisions on behalf of the Company. For purposes of this Code, “family members” include an employee’s spouse, brothers, sisters, parents, in-laws, and children whether such relationships are by blood or by adoption. Direct or Indirect subordinate relationships between family members are prohibited also personal relationships between subordinates are prohibited.

7.2 Disclosure of Conflicts of Interest

The Company requires that employees disclose any situations that reasonably would be expected to give rise to a conflict of interest. If an employee suspects they have a conflict of interest or could be reasonably perceived as having a conflict of interest, the employee must report it to a supervisor, the Human Resources Department, or the Compliance Department. The supervisor, Human Resources or Compliance will work with the employee to determine whether there is a conflict of interest, and if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in “Waivers of the Code” above.

8. CORPORATE OPPORTUNITIES

As an employee of the Company, you have an obligation to put the interests of the Company ahead of your own personal interests and to advance the Company’s interests when the opportunity to do so arises. If you discover a business opportunity related to the Company’s business through the use of corporate property or information or because of your position with the Company, you must first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee may use corporate property, information, or their position with the Company for personal gain, and no employee may compete with the Company either directly or indirectly.

9. CONFIDENTIAL INFORMATION

Employees have access to a variety of confidential business information while employed at the Company. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed, such as customer lists, commercial strategies, trade secrets, among others.

If you have any doubts whether any information or data concerning the Company is confidential, you must refrain from disclosure and check with a supervisor or the Legal Department. Employees have a duty to safeguard all confidential information, except when disclosure is approved by a legally authorized person on behalf of the Company or legally mandated.

Confidential information is not to be stored on wireless devices or saved on cloud based or other storage services not issued or authorized by the Company for the Company’s business use. For guidance consult your Company’s IT Security or Acceptable Use Policy. An employee’s obligation to protect confidential information continues after an employee leaves the Company. Unauthorized disclosure of confidential information could cause harm to the Company and could result in legal liability to you and the Company.



As a result of the Company's business relationships with customers, suppliers and others, employees may also have access to and be entrusted with confidential information of other companies, which confidential information is to be afforded the same protection as the Company's confidential information.

10. COMPETITION AND FAIR DEALING

The Company seeks to outperform our competitors fairly and honestly and seeks competitive advantages through superior performance, never through unethical or illegal business practices. There can be no agreements or understanding with competitors that affect prices, terms, or conditions of sale, or unreasonably restrain competition.

Stealing confidential proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing disclosures of such information by past or present employees of other companies is prohibited. Company employees should respect the rights of and deal fairly with its customers, suppliers, competitors, and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

11. ENTERTAINMENT, GIFTS, AND INVITATIONS

Receipt and exchange of entertainment, gifts, invitations, or anything of value are discouraged, and should never compromise your ability to make objective and fair business decisions. In other words, gifts and entertainment may never be exchanged for information, treatment or opportunities that otherwise would not be given.

In all countries in which you conduct business, you must be aware of applicable laws and particularly careful that entertainment, gifts, and invitations are not construed as bribes, kickbacks, or other improper payments.

Occasional business meals that are not lavish and attendance at reasonable events or entertainment offered to clients are permissible according to Company's Policies. The Company encourages that gifts given by employees to clients be limited to Daikin logo items such as pens, notebooks, and shirts.

The receipt and exchange of entertainment, gifts, invitations, or anything of value to public officials is restricted as detailed in the Anti-Corruption Compliance Policy for Daikin Latin America, please refer to the policy to obtain additional guidance.

12. PROTECTION AND USE OF COMPANY ASSETS; COMPUTER AND ELECTRONIC DEVICE USE

All employees should protect the Company's assets and ensure their efficient use for legitimate business purposes only. Theft, carelessness, and waste have a direct impact on the Company's profitability. The use of funds or assets of the Company, whether for personal gain or not, for any unlawful or improper purpose is strictly prohibited.

The Company's computer system and electronic devices (including, but not limited to, the desktop and laptop computer equipment; smartphones; hard drives; printers, peripherals; software and operating systems; and network and/or internet-related accounts providing electronic mail, access to the internet, newsgroup access, and/or file transfer capabilities) are the property of the Company and are to be used for the business purposes of the Company consistent with your Company's IT Security or Acceptable Use Policy.

The information in any computer-related file is Company property and must be treated and protected like any other piece of Company property. The computer or communication systems of the Company must not be used to commit any illegal act or to download, transmit, receive, view or post sexually explicit or other offensive material. In addition, the Code prohibits employees from disclosing confidential information about the Company, its customers, suppliers, directors, or employees.



The Company has the right to inspect the contents on all Company owned or leased computer equipment, phones, or other electronic devices. Any computer software utilized by the Company or its employees will be used in accordance with terms of any applicable software license or agreement. In general, the only software that should be loaded on your computer is that which the Company has approved and purchased.

Any activity that violates applicable law, this Code provision, or Company policies may result in disciplinary action, up to and including discharge, and/or disclosure to appropriate law enforcement officials.

13. COMPANY RECORDS

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and other disclosures and guide our business decision-making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business. All Company records must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. Company employees are responsible for understanding and complying with our record keeping policy. Each employee should ask a supervisor if there are any questions.

14. ACCURACY OF FINANCIAL REPORTS AND OTHER PUBLIC COMMUNICATIONS

The Company is subject to various laws, regulations and reporting obligations. Both the law and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete, or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the Accounting Department have a special responsibility to ensure that all financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws, and regulations for accounting and financial reporting of transactions, estimates and forecasts.

15. AUDITS AND INVESTIGATIONS.

The Company will monitor compliance with these policies by periodic audits. The Company will take appropriate corrective measures with respect to any audit findings. All Company employees are expected to cooperate with Company representatives and all competent authorities in matters of internal and external audits or investigations, government investigations and other activities relating to this Code to the fullest extent of the law.

On occasion, government auditors or investigators may contact individual Company employees directly. If you are in doubt about how to proceed, contact the Legal Department. Any request for information, complaint or other inquiry from a governmental organization should be forwarded directly to the Legal Department. Failure to cooperate fully in a Company investigation or audit shall be grounds for discipline up to and including the termination of employment.

16. COMPLIANCE WITH LAWS AND REGULATIONS; TRANSACTING INTERNATIONAL BUSINESS

Each employee has an obligation to comply with all laws, rules, and regulations applicable to the Company's operations. These include, without limitation, laws covering: bribery and kickbacks; copyrights, trademarks and trade secrets; information privacy; insider trading; illegal political contributions; antitrust prohibitions; foreign corrupt practices; offering or receiving gratuities; environmental hazards; employment discrimination or harassment; occupational health and safety; false or misleading financial information; false, misleading or deceptive advertising and inaccurate labeling; and misuse of corporate assets.



Each employee is expected to understand and comply with all laws, rules and regulations that apply to their position. If any doubt exists about whether a course of action is lawful, each employee should seek advice from their supervisor, the Human Resources Department, the Legal Department, or the Compliance Department.

The Company's policy on observing the highest ethical standards extends to its business transactions in foreign countries. Employees are expected to observe all applicable foreign laws to which they or the Company may be subjected. In addition, no employee should do anything in connection with any international transaction or take any action in any foreign country that would be illegal or improper in the United States or in any part of Latin America. International business raises at least the following potential issues, and any employee involved in selling our products internationally must become familiar with these laws and observe their requirements.

17. FOREIGN CORRUPT PRACTICES ACT/ANTI-BRIBERY

Many countries have enacted laws, regulations, and agreements that make it a crime to bribe government officials (which includes government employees, elected officials, political candidates, and political party officials, employees of public international organizations such as the World Bank and IMF, as well as agents, relatives, and close associates of government officials). The U.S. Foreign Corrupt Practices Act (FCPA) is the relevant law for the United States. The United Kingdom has a similar law, known as the UK Bribery Act, Mexico has implemented the National Anti-corruption System, Brazil has Law 12.846 and Argentina the Public Ethic Law (Law 25,188).

These laws, regulations, and agreements require the Company to be very careful in making any payments to foreign agents and consultants under circumstances in which it may appear the payments were made to foreign officials to induce them to give the Company business or buy the Company's products.

Other laws, regulations, and agreements prohibit commercial bribery of any other nature. Payments that the Company makes to agents or distributors should always be strictly for services rendered, and the amount stated should be reasonable given the nature of those services, supported with appropriate documentation. All employees are required to comply with the Company's policy prohibiting bribery by anyone in connection with the Company's business as detailed in the Anti-corruption Compliance Policy for Daikin Latin America.

More information on complying with the Company's anti-corruption policies and procedures can be obtained from the Company's Compliance Department. A violation of this policy could result in criminal penalties for individuals and civil and criminal liability for the Company.

18. ANTI-BOYCOTT LAWS

The Company conducts its business in accordance with applicable anti-boycott laws. These laws prohibit participating in or supporting any restrictive trade practice or boycott not authorized by the U.S. government and includes prohibitions against furnishing any information regarding the race, religion, or national origin of a person; refusing to do business with a boycotted firm or country and acting on any document that contains boycott language.

The Company must always be alert to requests for any such information. They are commonplace in such documents as letters of credit and shipping documents. Not only is furnishing the information illegal, but U.S. laws call for the Company to report the mere request for such information. Reports are subject to strict time limitations, and Company employees must immediately report any such requests (or suspected requests) to the Legal Department, or to the Daikin Applied Integrity Hotline or through *Speak up for Daikin*.

19. EXPORTS CONTROLS

Many countries, including the U.S., regulate the export of specified goods and technology. Permits and licenses may be required when exporting items or technology. In the U.S, there is also an obligation to obtain an export license before releasing (by any means) controlled technology or software source code to a foreign person located in the



U.S. or abroad, referred to as a “deemed export”. Such release is deemed an export to the home country or countries of the foreign person.

These permits and licenses document the countries involved, the nature, quantity, and intended use and end user of the item or technology to be exported. Company complies with the export control laws and regulations of all countries in which we operate. All export activity must be conducted in accordance with Company export control policies and procedures. More information on export controls is available from the Legal Department or the Compliance Department.

20. DENIED PARTIES

Employees shall ensure there are no Company activities with countries, companies, groups, or individuals found on restricted lists published by the U.S. Department of Treasury, Department of Commerce, or other regulatory agency.

The Office of Foreign Assets Control ("OFAC") of the US Department of the Treasury administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, companies and individuals, and other parties deemed threats to the national security, foreign policy or the economy of the United States. A list of countries with trade restrictions imposed by the U.S. can be found at <https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>.

OFAC also publishes a list of individuals, and companies owned or controlled by, or acting for or on behalf of, targeted countries, along with specific individuals, groups, and entities that are targeted (collectively, such individuals and companies are called “Specially Designated Nationals” or “SDNs”). A list of denied companies and parties may be found at <https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>. Any matters involving these countries, companies or parties should be directed immediately to the Compliance Department.

The U.S. Department of Commerce International Trade Administrations administers the “Consolidated Screening List” or “CSL” which is a list of parties for which the U.S. Government maintains restrictions on certain exports, reexports, or transfers of items. The CSL is available at <https://www.trade.gov/consolidated-screening-list>.

If you have questions or if you identify a party on the list, you should immediately contact the Compliance Department for further guidance before proceeding with such party.

21. COMPLIANCE WITH GOVERNMENT CONTRACTING REQUIREMENTS

The Company may provide equipment or services to government customers, or private customers funded in whole or in part with public funds. In such cases, Company must satisfy additional obligations. Any employees handling these types of transactions must comply with all applicable statutory, regulatory and contractual requirements including, but not limited to: (i) security clearance; (ii) confidentiality requirements; (iii) providing accurate and complete information, documentation and certifications and ensuring that all certifications and representations provided in connection with any government contract are updated in a timely and accurate manner as sourcing, pricing, or other changes occur; and (iv) the prohibition of offering anything of monetary value to government employees or their families (such as but not limited to gifts, gratuities, entertainment, travel, meals, etc.).

22. POLITICAL CONTRIBUTIONS

All employees must comply with the campaign finance and election laws of the countries in which the Company operates. Company funds, assets (including phones, copiers, or computers), services or facilities cannot be used on behalf of any political party or candidate.



23. COMMITMENT AND CERTIFICATION

Your commitment to conduct yourself in accordance with this Code is essential to its success. Each of us has a personal responsibility to adhere to these guidelines and to report any potential or actual violations. The Company requires that all employees certify that they have received and read this Code and understand its contents.

Section 01.04.06 – Revision History

- | | |
|-------------------------------|----------------------------------|
| 1) August 2015 policy adopted | V.2014.1 – Version 08/31/2014 |
| 2) April 2018 revision, V.2 | V.2017.1 – Version 04/05/2018 |
| 3) January 2020, V.2.1 | V.2020.2.1. – Version 01/15/2020 |
| 4) January 2021, V.2.2 | V.2021.2.2 – Version 29/01/2021 |
| 5) January 2022, V.2.3 | V.2022.2.3- Version 01/24/2022 |

Translations	PDF, version
English	v.2.2
Spanish	v.2.2
日本語	v.2.2
Portuguese	v.2.2



DAIKIN'S GROUP CONDUCT GUIDELINES

<https://www.daikin.com/csr/company/idea.html#chap05>

1. **Providing Safe, High Quality Products and Services**

We shall make every effort to ensure the safety and quality of our products and services from the standpoint of our customers. Should a problem occur regarding safety, we shall immediately take appropriate action.

2. **Free Competition and Fair Trading**

We shall observe all applicable laws and regulations relating to fair competition and fair trade of each country and region, including antimonopoly laws. Furthermore, we shall conduct fair sales and procurement activities based on proper corporate ethics and in accordance with sound business practices and social norms.

3. **Observing Trade Control Laws**

We shall not participate in any transactions that may undermine the maintenance of global peace and security and world order. We shall always act in compliance with all applicable export- and import-related laws and regulations of each country and region, as well as the Daikin Group Security Trade Control Policy, which relates to foreign trade control.

4. **Respect and Protection of Intellectual Property Rights**

Recognizing that intellectual property rights are important company assets; we shall strive to protect and maintain our intellectual property rights and effectively utilize them. Furthermore, we shall respect and make every effort not to infringe upon the intellectual property rights of other companies.

5. **Proper Management and Utilization of Information**

We shall properly manage and effectively utilize the confidential information of our company, the confidential information obtained from other companies, and the personal information of our customers and employees and shall not obtain any information through improper means. We shall thoroughly execute IT security management for our computer systems and the data-resources saved on them.

6. **Prohibition of Insider Trading**

To maintain the trust of the securities market, we shall not use non-public information about the Daikin Group or other companies to buy or sell stocks or other securities (insider trading).

7. **Timely and Appropriate Disclosure of Corporate Information**

Aiming to be an "open company" with high transparency and earn the respect of society, we shall actively convey corporate information in a timely fashion not only to shareholders and investors but also to a wide spectrum of society and engage in two-way communication.

8. **Preservation of the Global Environment**

We shall observe all applicable environmental laws and regulations of each country and region and practice initiatives that preserve the global environment in all aspects of our business operations, including product development, manufacturing, sales, distribution, and services. Also, each and every one of us shall deepen our knowledge of environmental issues, reduce the environmental load in the workplace and at home, and strive toward biodiversity conservation.

9. **Ensuring the Safety of Operations**

We shall take all possible precautions for safe operations and act with a mindset of "Safety First" to ensure the safety of the workplace and further gain the trust of people in the regions we serve.



10. Respect for Human Rights and Diversity and Observance of Labor Laws

We shall respect the human rights of each and every employee and shall not engage in conduct that discriminates on the basis of nationality, race, ethnicity, religion, color of skin, age, gender, sexual orientation, or disability. Diversity in individual values is enthusiastically accepted, and we shall work to make the unique talents and abilities of each and every person the driving force of the organization. We shall also observe both the letter and spirit of all labor laws and regulations of each country and region, and under no circumstances shall we sanction the labor of underage employees, minors who do not meet the minimum legal age requirements (child labor), or labor performed under compulsion or against a person's will (forced labor).

11. Protection of Company Assets

We shall properly manage the tangible and intangible assets of our company to protect and effectively utilize these assets.

12. Proper Handling of Accounting Procedures

We shall comply with all accounting standards and tax laws of each country and region as well as internal company rules in properly performing accounting procedures.

13. Practicing Moderation in Entertainment and Gift Exchanges

We shall exercise moderation and perform within the acceptable range of social norms and obey the laws and regulations of each country and region regarding entertainment, the exchange of presents, and invitations relating to the development of our global business. In particular, we shall not entertain, provide gifts of monetary value to, or extend invitations to public officials in Japan or abroad that violate the applicable laws and regulations in each respective country and region.

14. Maintaining a Firm Attitude against Anti-social Activities

We shall take a firm attitude against anti-social force or organization that threatens the safety and order of the citizens of society.

15. Relationship with Society

We aim to be a good corporate citizen that is trusted by society and we shall do our best to act with humility and modesty while at the same time having self-awareness and taking pride in our actions. Moreover, we shall participate in social contribution activities centered on environmental conservation, education support, and cooperation with the local community.

16. Observing Each Category of Industry Law and Regulation

We shall accurately comprehend and observe all business laws and regulations of each country and region applicable to our business activities.












VF_LATAM_CoC_ENG_Feb_2022


Final Audit Report


2022-03-29


Created:	2022-03-16
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Transaction ID:	CBJCHBCAABAAffBDKhBvEnh87fS0-aNOAMPwKXd91Yti


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