

Group Conduct Guidelines

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Daikin's Group Conduct Guidelines define the fundamental corporate ethics and compliance that each and every officer and employee of all Group companies around the world must follow in conducting businesses globally.

Each Group company globally then establishes their specific codes of conduct in accordance with the laws and customs of each country and region. In this manner, we comprehensively promote best practices in corporate ethics and compliance.

Note: The specific guidelines apply to Daikin Industries, Ltd. and its Group companies in Japan only.

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_01-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_02-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_03-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_04-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_05-pdf

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).

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_06-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_07-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_08-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_09-pdf

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).

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_10-pdf

11. Protection of Company Assets

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

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_11-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_12-pdf

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 in regards to 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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_13-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_14-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_15-pdf

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.

Specific Guidelines

https://www.daikin.com/-/media/Project/Daikin/daikin_com/csr/new/pdf/management/conduct_16-pdf