



Date of issue: March 11, 2024	Effective date: March 11, 2024	Version: 02	Next scheduled review date: March 11, 2025
Replaces: ANTI-CORRUPTION COMPLIANCE POLICY FOR DAIKIN LATIN AMERICA			Responsible: LATAM Compliance Department

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY FOR DAIKIN ENTITIES IN LATIN AMERICA

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1. Definitions

Act of Corruption	<p>It refers to any action or behavior that, in order to obtain a personal or group benefit or advantage, is carried out with dishonesty, lack of ethics, abuse of power, among others.</p> <p>Acts of corruption can manifest themselves in different forms, such as embezzlement of funds, obstruction of justice, abuse of functions, nepotism, extortion, fraud, money laundering and benefit from personal relationships and can occur both in the private and In the public.</p>
Corruption	It refers to the abuse of power that a person exercises to obtain a benefit, either through actions or omissions.
Daikin or the Company	It refers jointly to the entities listed in Annex A.
Compliance Department	Latin American Compliance Department.
Entertainment	Any activity, event or content that provides fun, pleasure or distraction to people.
Public workers	<ul style="list-style-type: none"> - Any elected official, public employee, military personnel, official or employee of the Government (state, federal and/or local). - Any person acting in an official capacity in the name and representation of a Government, Government Office or Agency or Ministry. - Any person who has a shareholding in all or part of a government entity. - Any official or employee of an international organization such as the World Bank, the World Health Organization, the United Nations, among others. - Any political party, official of a political party or candidate for public office. - Spouses, the concubine, the common-law partner and the people with whom they are related by consanguinity or affinity up to the second degree of the people included in the previous sections, including wives, children, siblings and other relatives.
Government	Set of authorities and administrative bodies of a country or political community.
Invitation	Action of inviting a Public Official, but not limited to, to hold a meeting with Daikin Latin America Personnel, for commercial purposes.
Money/asset laundering	Conversion, transfer, acquisition, use, custody, administration, concealment of money, goods, effects or profits, whose illicit origin is known or should be presumed, in order to avoid the identification of its origin, seizure or confiscation. The transportation or transfer, within national territory, of money or negotiable financial instruments whose illicit origin is known or should be

	presumed, with the purpose of avoiding the identification of their origin, is also considered money/asset laundering, as well as the omission communication of suspicious operations or transactions and the rejection, delay and/or falsehood in the provision of information.
Staff	Employees, Directors, Managers, and in general any collaborator (temporary or permanent, including external collaborators) regardless of their position or level and who works for the Company.
Gift	Object, benefit, advantage, entertainment, or anything considered of value, capable of being offered, promised or accepted with the purpose of benefiting the person who receives it, directly or indirectly. Gifts imply the free delivery of goods, services or benefits, and gifts may be made by the Personnel to a Third Party, or vice versa.
Bribery	Offer, promise, authorize or pay money or anything of value to a third party with the intent to obtain or retain business, or secure an improper advantage or benefit.
Third parties	Natural or legal persons who maintain relationships with the Company. Third Parties include contractor clients, distributors, suppliers, consultants, representatives, subcontractors and business partners, among others.
Terrorism	Provoke, create or maintain in a state of alarm or fear the population or a sector of it, through acts against life, body, health, personal freedom and security or against the property or the security of any good or service, whether public or private, using any means capable of causing havoc or serious disturbance of public tranquility or affecting international relations or the security of society or any country.
Final user	It refers to the natural or legal person who uses a product, service or system marketed by the Company and who does not necessarily maintain relations with the Company.
Government Sales	<ul style="list-style-type: none"> i) It involves sales made directly between the Company and a Government or government agency, through the Company's participation in a bidding or direct award process, after compliance with legal requirements. ii) It involves a transaction between the Company and a Third Party, for example, a contractor, mechanical contractor, consortium, construction company or installer, for resale on its behalf. The end user will be a government entity. In this context, Daikin Latin America can provide both all the goods or services required, or only



	<p>a part of them, to allow the participation of the third party in the corresponding process. In this case, the Company may or may not sign a letter of endorsement/support for the benefit of the Third Party.</p>
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2. Introduction.

At Daikin we believe that Compliance is as essential as the air we breathe and that is why Bribery and any other form of corruption is strictly prohibited, both in the private and public sectors. Being a group with an international presence, Daikin adheres to and reiterates its commitment to comply with the anti-bribery and anti-corruption laws established in all the countries in which it has operations.

An integral component of the Company's mission involves practicing ethics, fairness and professionalism in all its business transactions with Third Parties, complying with all applicable provisions to combat Bribery and Corruption, such as the Corrupt Practices Act in the Act of 1977 (or "FCPA"), among others.

Therefore, in line with our corporate value of "Absolute Credibility" and the Daikin Group philosophy that establishes the following:

...With our relationship with society in mind, let us act and earn the trust of society. Let's be open, fair and recognized by society...

...We must exercise restraint and perform within the acceptable range of social norms and obey the laws and regulations of each country and region with respect to entertainment and gift exchanges conducted in connection with our business. In particular, we will not provide entertainment or gifts of monetary value to Public Officials locally or abroad that violate the laws and regulations applicable in each Country and Region...

All Personnel must comply with the Anti-Corruption and Anti-Bribery Policy for Daikin entities in Latin America ("Policy"). The Policy is also based on our principles of compliance and transparency:

...It is the firm policy of the Daikin Group to comply with all applicable Anti-Corruption and Anti-Bribery Laws. You must not give, offer or promise anything of value to any Government Official to obtain or retain business or obtain an improper advantage...

3. Objective and scope.

The objective of this Policy is to ensure that Daikin Personnel and Third Parties comply with the laws and regulations related to the fight against corruption and bribery and prevention of money/asset laundering applicable in the countries in which the Company does business, as well as prevent, detect and punish, where appropriate, Acts of Corruption and Bribery.

This Policy applies to all Company Personnel and must be followed at all times. Personnel must pay special attention to any business (either potential or actual) carried out with Public Officials and never



participate in acts that may be considered Corruption, Bribery or in general illicit or contrary to the values, philosophy and corporate ethics of our group. .

Violation of applicable laws or this Policy may warrant various sanctions and even termination of the employment relationship.

Likewise, this “Policy applies to any agreement, contract or negotiation in all countries where Daikin Latin America has operations. Additionally, what is established in this Policy may apply to Third Parties acting on behalf and/or representing the Company.

4. Interactions with Public Officials.

a) Entertainment, Gifts and Invitations to Public Officials.

This section contains compliance principles and procedures for Entertainment, gifts and invitations provided by Daikin Latin America Personnel to Public Officials in accordance with the following:

i. General Compliance Principles for Entertainment, Gifts and Invitations to Public Officials.

- **All expenditures for “corrupt purposes” are strictly prohibited:** Regardless of form or content, any expenditure for “corrupt purposes” or to obtain improper advantages is prohibited by this Policy and the Company's Code of Business Conduct and Ethics.

Corrupt purposes include any action to cause a Government Official to take or omit an action in violation of legal duty. Inappropriate gifts, payments or offers of anything of value to Public Officials are also prohibited.

- **Allowable expenses must be provided directly to the Government Official.**

Any Entertainment, Gift and/or Entertainment to a Government Official that is authorized, in compliance with this Policy, must be provided directly to the Government Official.

It is prohibited to provide Entertainment, Gifts or Invitations to family members and in general people directly or indirectly related, either through work, personal or emotional relationships, with a Government Official. Payments through Third Parties or intermediaries are prohibited.

- **Expenses related to Public Officials must comply with Local Laws.**

In many countries, the legal documents or provisions that govern the actions of Government Officials prohibit those Public Officials from accepting Entertainment or Gifts that exceed a certain monetary limit, or sometimes they are even prohibited from accepting them altogether. Therefore, when you wish to provide Entertainment, Gifts or Invitations to a Government Official, it is necessary not only to review that doing so does not violate applicable laws and regulations, including the FCPA and the Codes of Ethics and Conduct or similar. If Personnel have any



questions about the permission to offer Entertainment, Gifts or Invitations to a Government Official, they should contact the Compliance Department for advice. As long as the Personnel do not have approval from the Compliance Department, the offer of any type of Entertainment, gift or invitation is strictly prohibited.

- **Expenses related to Public Officials within a period of six months before and after a hiring period.**

It is prohibited to provide Entertainment, Gifts or Invitations to a Government Official who is responsible for or has influence over the outcome of a public procurement process, regardless of its form, in which the Company participated or wishes to participate, during the contracting period and from/up to six months before and after it, regardless of the result.

a) Compliance Principles for Invitations to Public Officials.

Staff must comply with the following when extending Invitations to Public Officials:

1. All Invitations must be previously registered and approved according to the guidelines of the Handbook for Reporting Interactions with Public Officials Public Officials.
2. An invitation must be clearly necessary and have a legitimate business purpose, such as: demonstration, explanation or promotion of products; sales promotion activities; training; develop the required investigations or audits, among others.
3. The invitation must be accompanied by an agenda that includes the schedule, agenda and itinerary of the invitation and must be consistent with the legitimate business purpose.
4. If the Company assumes any expenses of a Government Official in connection with the invitation (for example: flights, accommodation or travel expenses), all such expenses must be reasonable and in accordance with the rules established in this Policy, as well as those specified in the Handbook for Reporting Interactions with Public Officials.
5. It is prohibited to incur any expenses borne by the Company for recreational activities (e.g. nearby sightseeing during weekends, holidays or free time) nor should suggestions be made for experiences, entertainment or ancillary activities.

b) Compliance Principles for Entertainment and Gifts to Public Officials.

Entertainment, Invitations and Gifts include the offering of meals and travel expenses and, in general, of anything of value to or for the benefit of the Government Official.

Personnel must comply with the following limits to provide Entertainment and gifts to a Government Official:

1. All Entertainment and/or gifts to be provided to a Government Official must follow the approval process outlined in Daikin's Handbook of Interactions with Public Officials, and must not exceed \$100 USD (including taxes), during the same year. fiscal.



2. Company promotional items (for example: coffee mugs, pens, hats, t-shirts, etc.), and other business courtesies may be given to Public Officials only with prior approval from the Department. When such items or business courtesies exceed \$50 USD.
3. Giving gifts consisting of cash or equivalent (for example: gift cards or electronic wallets, bank transfers or checks) is strictly prohibited.
4. If the nature of the gift or Entertainment is air travel, lodging or other travel-related expense, it must be arranged and paid for by the Company and not the Government Official, without exception. For these exceptional cases, there must be prior written approval from the Compliance Department.
5. Means of transportation, lodging and travel expenses for Public Officials must not exceed the amounts authorized by the Company's Employee Travel and Expense Policy for equivalent items in similar circumstances.
6. Personnel should consider the following criteria before making an expenditure:
 - a. Legality of the expenditure.
 - b. Objective, necessity and appropriateness of the expenditure.
 - c. Reasonable connection between the expenditure and the permitted business purpose.
 - d. Reasonable time between the invitation and the purpose of the business.
 - e. The Company must make reasonable travel expenses when paid by the Company.
 - f. No extravagant expenses; and
 - g. All points on the itinerary must be related to the interaction.

- **Staff must record all Entertainment, Gifts and Invitations under this Policy:**

All Entertainment, Gifts and Invitations that are exceptionally allowed to be offered to Public Officials must comply with local legislation, have the approval of the Compliance Department and be carried out in accordance with the recommendations indicated by said department.

Personnel involved in the request, approval, payment or reimbursement of such expenses must generate detailed and accurate records of the activities and amounts related to Entertainment, Invitations and Gifts for a Government Official, regardless of the amounts involved, in accordance with the following guidelines.

- a. **Expense report on Interactions with Public Officials.** To record any Entertainment, Gifts or Invitations intended to be offered to Public Officials, Personnel must complete the Interactions with Public Officials Report: <https://forms.office.com/r/f5rEDXpSQ4?origin=lprLink>.



All interactions with Public Officials must be reported in accordance with the above, even when they do not generate expenses. For more details, please consult the Handbook for Reporting Interactions with Public Officials.

- b. **Annual Report.** Annually, during the month of February and prior to the close of the fiscal year, the Compliance Department will share with Daikin's local finance departments the annual report with all expenses related to Entertainment, Gifts or Invitations that Personnel have reported during the fiscal year (the “Annual Report”).

Each local finance department must review that the expenses reported in the Annual Report match their accounting records.

Once validated, the Annual Report must be signed by the finance department and sent to the internal audit team with a copy to the Compliance Department, at the end of each fiscal year (that is, no later than March 31 of the current year).

Even if no expenses have been reported during the fiscal year, the finance department or person responsible must send the Annual Record in zeros, duly signed.

ii. **Communications with Public Officials.**

Communications with Public Officials must always be done through formal and verifiable means, whether through official writings or emails. It is prohibited to have any communication through informal means, with a Public Official (for example: WhatsApp or similar applications) and even in unofficial emails.

Agreements reached for operational purposes and through non-corporate channels must be ratified through the official means mentioned previously.

5. Contracting of Third Parties.

When a Third Party provides goods or services to Daikin or a Sale is made to the Government through them, the Third Party is prohibited from carrying out or engaging in acts of Bribery or Corruption with Public Officials.

The applicable laws on the matter consider managers and companies responsible for Bribes offered or made to Public Officials through a Third Party, or when managers know or have reasons to know about the Bribery, or ignore the possibility of a Bribe.

Therefore, before contracting with a Third Party, you must comply with all the procedures established in this Policy and within, including the registration process that involves carrying out verifications such as a “background screening” or a “Compliance Due Diligence”. , as required.



In cases where the activities of the Third Party raise a red alert or there is an indirect sale to the Government, an “Enhanced Due Diligence” may be required. The Compliance Department will help Personnel determine the specific steps that must be taken in both cases, based on the specific situations.

a) Procedure for hiring Third Parties.

Before hiring a Third Party that will act for or on behalf of Daikin Latin America or that will have an intermediary relationship with government institutions, the Compliance Department in conjunction with the Requesting area must take the necessary steps to verify that the commercial and contractual relationship with said Third Party complies with the laws and policies of the Company.

Likewise, the Purchasing, Finance, Legal and Compliance Departments must ensure the capacity, resources, references, financial solvency and compliance of Third Parties with all Company Policies and processes, including this one.

All agreements with Third Parties to act on behalf and/or representation of any Daikin Latin America entity must be in writing and must include the Clauses indicated by the Legal and Compliance Department.

In addition, the Purchasing, Legal and Compliance Departments must ensure that Third Parties sign the Supplier Code of Conduct, as applicable, and it is an integral part of the agreement entered into between said Third Party and the Company.

Likewise, even after the completion of the review procedures mentioned in the previous paragraphs and at any time, the Compliance and/or Legal Departments may recommend rejecting the potential Third Party or instruct a new review to be carried out. Daikin Latin America may hire a provider with experience in Third Party investigation to perform the background check on behalf of the Company. The Compliance and Legal Departments will retain a copy of the complete report and all supporting documents of the investigation carried out by the Company.

b) Sales through Third Parties.

Personnel must observe the provisions of the Third Party Sales Policy for Daikin Entities in Latin America.

6. Government Sales

It is prohibited for two related companies (that share shareholders or that are part of the same business group) to participate in the same bidding process, as this may create potential exposures of monopolistic practices (simulation) and money/asset laundering.

Furthermore, it is unacceptable to participate directly in public bidding processes and at the same time support the proposal of Third Parties that will be competing in the same process. An exception to this



assumption can only occur through a case-by-case analysis and previously approved in writing by the Legal and Compliance Departments.

The Sales, Legal and Compliance Departments must ensure and verify the viability of compliance with the requirements of the technical and contractual proposal, with all the conditions of the contracting process. The corresponding contracts must be reviewed by the Legal department, in accordance with the provisions of the Contract Policy, if applicable. The Sales team must send all required information to the Legal Department at least 10 (ten) days in advance.

Additionally, during the public procurement process, contracts must be formalized and executed within the time limits established by the government entity. Likewise, during the execution term, the departments involved in the fulfillment of the contract must ensure that no deviation or non-compliance with the acquired obligations occurs. In the event that the government institution requests a deviation or modification, it must be confirmed with the Legal Department that this request is within the limits established in the contract and that the request by the Government entity has already been made in writing, through institutional means. In this scenario, the Legal department should always be consulted after confirmation with the government entity regarding any request. In the event that Personnel have access to confidential information about the procedure by any means, the Compliance and Legal Departments must be immediately notified.

All proposals and quotes prior to a public procurement process or those that are part of the process must be sent directly by the Company or indirectly through a Third Party, such as a contractor, mechanical contractor, construction company, specifier or installer, with prior authorization. of the company. On the other hand, the Personnel must register the above in the Company's Customer Relationship Management System, or its similar ones in each subsidiary, always identifying the End User and which must be approved by the Sales Manager, the Director of Finance and the President, CEO or General Director.

Any Third Party that participates in a public procurement procedure must have a background check through the procedure described in the previous section and before any interaction with Daikin and, consequently, with the government entity. Therefore, it is necessary to notify the Compliance Department at least 15 (fifteen) business days in advance to carry out said procedure.

In case of participating in sales through Third Parties to the Government, Daikin Latin America's participation will be strictly on the necessary bases (providing technical documentation, letters of support/support, etc.) and without influencing or participating directly or indirectly in the process. or determining the price at which the client must market the products and/or services, even implicitly. Two or more Third Parties may require Daikin Latin America to support their participation in the same bidding process and vice versa. Daikin Latin America will grant the same price of the goods and/or services to said Third Parties, so that they unilaterally determine the price of their offer to the End User, in order to avoid discriminatory treatment. However, there are specific justifiable cases where



such differentiation is acceptable, in such cases there must be approval by the Finance, Legal, Compliance and General Management departments.

In some cases, as part of this type of sales, Daikin Latin America may extend a letter of support and/or endorsement to the Third Party. In any case, said letter must be previously reviewed and approved by the Legal Department.

The information provided by email or other means must be strictly necessary so that Third Parties can make offers and, where applicable, respective sales (technical information documents) or financial information (invoices, purchase orders, etc.). The language must be clear, simple, objective and deal exclusively with strictly necessary technical or commercial matters. In all cases, quality, competence, impartiality and better economic conditions must prevail, with respect to the principles of free competition. The practice of such principles should be sought not only within the Company, but also by Third Parties.

It is prohibited to intentionally divide a transaction into several smaller ones for the purpose of maintaining, hiding or dividing the actual amount of the transaction.

All Personnel are prohibited from providing confidential information or trade secrets to Third Parties, unless there is a confidentiality agreement signed by the Third Party and Daikin Latin America and only in the event that it is necessary for the hiring process and, if applicable, prior approval by written from the Legal and Compliance Department.

7. Facilitation Payments

A facilitation payment is a payment to a Public Official to expedite or facilitate a government process or procedure. Even in locations where these payments are permitted by law, Daikin prohibits all facilitation payments.

Some examples in which authorities may request facilitation payments may be a visa process, providing police protection or mail service, providing public services such as telephone service, energy, and water, obtaining permits or licenses, customs processes, among others. .

Facilitation Payment Process and Procedure.

Any request for a facilitation payment must be treated as follows:

1. Rejection: Explain that our Company Policy does not allow payments that are not recognized by laws or regulations.
2. Request legal bases. Request an explanation of the legal basis for such a request.

3. Exception for life, physical integrity, health or freedom: In cases where refusing to make a payment may result in a risk to the life, health, integrity or freedom of the Personnel, you may agree to make the payment.
4. Report. Immediately after receiving a request for any facilitation payment, or carrying it out under the assumption of exception, you must immediately report it to the Compliance and Legal Department.

8. Prevention of money/asset laundering and acts of terrorism

Financial integrity

Money/asset laundering and embezzlement represent a significant risk to the Company's operations and reputation. Therefore, Daikin recognizes the importance of maintaining the financial integrity of the Company, doing business only with reputable Third Parties and carrying out legitimate commercial activities in which funds of legal origin are used and all current legal provisions are complied with. always fostered best practices and a culture of compliance.

The Company prohibits and categorically rejects any practice linked to Money/Asset Laundering and Terrorism in general.

The Company prohibits and sanctions the performance of these acts because they are contrary to its principles and values, in addition to being strictly prohibited in its Code of Ethics and Conduct and in this Policy.

Company Personnel must act with honesty and transparency, always respecting the current legal framework and avoiding any action that could be interpreted as an act linked to Money/Asset Laundering or Terrorism.

The Company has the commitment and purpose of preventing resources from money/asset laundering and/or terrorism from being incorporated into its capital stock and activities, whether said illicit origin is known or could be presumed.

In the event that the Personnel has knowledge or indications of the illicit origin of resources or practices linked to Money/Asset Laundering or Terrorism in general, they will communicate it directly and immediately to the Compliance Department, the Legal Department and, as applicable, the person in charge of prevention.

Failure to comply with this provision may also lead to liability for Personnel who fail to report the above.



The Company will refrain from entering into commercial relationships with companies whose shareholders, representatives or officials have been sentenced for the crime of Money/Asset Laundering, Terrorism or other similar crimes.

Warning signs

Personnel have the responsibility of remaining attentive to warning signs from clients and suppliers. Warning signs are situations or operations that are outside of normality and constitute a potential conduit for carrying out unusual or suspicious operations.

As an example, below is an illustrative but non-limiting list of some situations that may occur in activities, businesses, products and/or transaction modalities that could imply the existence of unusual or suspicious operations.

In relation to clients:

- The customer refuses to provide the requested information or the information provided is inconsistent or difficult to verify by Daikin.
- The client indicates an address that corresponds to a business different from the one declared and/or does not appear to correspond to the declared occupation.
- The client refuses to fill out the required forms or to provide the information necessary to complete them or to perform the transaction once requested to fill out the forms.
- Frequent or unnecessary use of intermediaries to carry out commercial or financial operations.
- The operations do not correspond to the client's profile.
- The information provided by the client reveals a situation that differs from that corresponding to similar businesses.
- The client insists on meeting the Staff in a place other than the offices to carry out an operation.
- The client constantly carries out transactions and in an unusual way uses or intends to use cash as the only means of payment instead of others.
- Clients domiciled in countries with low or no taxation.

In relation to suppliers:

- Inconsistencies are identified in the occupation declared by the provider.
- The supplier insists on meeting the Personnel in a place other than the offices to manage their hiring.
- Suppliers that offer products or services whose origin is not exact or do not prove their legal origin.
- Suppliers who offer products at prices much lower than those of the market, without any justification.
- Suppliers who offer conditions and terms that are too attractive in relation to market conditions, without any justification.
- People whose correspondence addresses are based on postal codes or constantly change their home address or telephone number.
- The provider refuses to update information when required or when it cannot be confirmed.
- The supplier requests Daikin to make payments to different people and/or accounts of which it is not the owner.
- Suppliers domiciled in countries with low or no taxation

Customer and supplier knowledge

Daikin will carry out a verification of the identity and integrity of those Third Parties with whom it intends to carry out commercial relations. This verification includes document request and background analysis, risk assessments, and verification of the source of funds for significant financial transactions. The Company reserves the right to refuse to do business with any Third Party that does not meet Daikin's standards of integrity and transparency.

Knowledge of the client or supplier may be manifested by adopting the following measures, as determined by the Compliance Department:

- Confirm and document the true identity of clients or suppliers who begin a business relationship. In the case of natural persons, an identity document will be required, proof of address and fiscal/tax status document, among others, as deemed appropriate and/or necessary. In the case of legal entities, a company incorporation document, proof of address, fiscal/tax status document, information related to its main activity and others, as considered convenient and/or necessary, will be required.



- Identify if the client or supplier is related to a person qualified as a Politically Exposed Person (PEP).
- Request criminal and judicial records of the main representatives or officials of the client or supplier.
- That the client, business partners, contractors, consultants or suppliers sign a sworn statement certifying compliance with current legal provisions, including those related to Money/Asset Laundering, Terrorism and that their representatives or main officials do not have definitive convictions for said crimes. , among others.

9. Report potential violations

If Personnel violate this Policy, they will be subject to disciplinary sanctions, including termination of employment.

Additionally, if Personnel have committed an act of Bribery, know or suspect that another employee has committed it, they must immediately notify the Legal Department and the Compliance Department, either directly or using the means that the Company offers to report. this type of situations such as Daikin Integrity Hotline or Speak up for Daikin through its different means:

1. The Staff of Daikin Airconditioning México, S. de RL de CV, Daikin Manufacturing México, S. de RL de CV, Daikin AR Conditionado Brasil Ltda., Daikin Ar Conditionado Amazonas Ltda., and Daikin Airconditioning Argentina Anonymous Organization. They will be able to do so through the Speak Up for Daikin reporting tool (www.speakupfordaikin.com).
2. For the Personnel of Daikin Applied Latin America, LLC, SAEG Group and CYVSA Group, they may do so through the following form: <https://forms.office.com/r/B0ZPJx4Jiy?origin=lprLink>

Personnel who refuse to accept or offer a Bribe, or those who raise concerns or report an improper act by another, will not suffer any type of retaliation for this. Daikin Latin America will always reinforce its commitment to transparency and will support anyone who raises genuine and good faith concerns under this Policy, even if it turns out that they are wrong.

If you have any questions related to Entertainment, gifts or invitations to Government Officials or about hiring a Third Party, or regarding any provision established in this Policy, please contact the Compliance Department. See Annex B for contact information for the Legal Department and the Compliance Department.



Annex A: List of entities that comprise Daikin Latin America:

- 1) Daikin Applied Latin America, LLC
- 2) SAEG International Group, Inc.
- 3) CYVSA Group, SA de CV
- 4) Daikin Airconditioning Chile, SA
- 5) SAEG International Group, SpA.
- 6) Daikin Airconditioning Colombia, SAS
- 7) SAEG Engineering Group SAS
- 8) Daikin Airconditioning Peru, SAC
- 9) SAEG Peru, SA
- 10) SAEG Engineering Group, SRL
- 11) SAEG Engineering Group Public Limited Company
- 12) SAEG Engineering Group Public Limited Company
- 13) Heating and Ventilation, SA de CV
- 14) Ventilation Designs and Projects SA de CV
- 15) Cyvsa Residencial, SA de CV
- 16) Clima-flex, SA de CV
- 17) Ductos y Formas SA de CV
- 18) Cyvsa International Inc.
- 19) Heating and Ventilation of the Southeast SA de CV
- 20) Maintenance SA de CV
- 21) Cyvsa Cancún SA de CV
- 22) Cyvsa Guadalajara SA de CV
- 23) Cyvsa Loma SA de CV
- 24) Cyvsa Santa Fe SA de CV
- 25) Cyvsa Universidad SA de CV
- 26) Cyvsa Nuevo Polanco SA de CV
- 27) Cyvsa Tlalpan SA de CV
- 28) Formduct SA de CV
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- 30) Daikin Manufacturing México, S. de RL de CV
- 31) Daikin AR Conditioning Brazil Ltda
- 32) Daikin Ar Conditioned Amazonas Ltda.
- 33) Daikin Air Conditioning Argentina Sociedad Anónima.



Annex B: Contacts Compliance Department and Legal Department at Daikin Latin America.

Daikin Applied Latin America, LLC

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Legal department:

Diana Marietti
diana.marietti@daikinapplied.com

SAEG International Group, Inc.

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Legal department:

Diana Marietti
diana.marietti@daikinapplied.com

CYVSA Group, SA de CV

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Nancy Jimenez
Nancy.jimenez@cyvsa.com

Legal department:

Diana Marietti
diana.marietti@daikinapplied.com

Maria del Carmen Santibanez
maria.santibanez@cyvsa.com

Daikin Airconditioning Mexico, S. de RL de CV

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Legal department:

Octavio Reynero
octavio.reynero@daikin.com.mx

Daikin Manufacturing Mexico, S. de RL de CV

Compliance Department:



Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Legal department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Daikin AR Conditioning Brazil Ltda

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Cauana Valerian
cauana.valeriano@daikin.com.br

Legal department:

Cauana Valerian
cauana.valeriano@daikin.com.br

Daikin Air Conditioning Amazonas LTDA

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Cauana Martinez Valeriano
cauana.valeriano@daikin.com.br

Legal department:

Cauana Martinez Valeriano
cauana.valeriano@daikin.com.br

Daikin Air Conditioning Argentina Sociedad Anónima

Compliance Department:

Andrea Perez Figueroa
andrea.perez@daikin.com.mx

Legal department:

Ana Clara Honors
ahonores@daikin-argentina.com