

SUPPLIER CODE OF CONDUCT

This Code of Conduct for Suppliers of Daikin Applied Europe S.p.A. ("DAE") sets out the ethical and social principles and standards that DAE expects from all its suppliers, wherever they are located in the world.

We expect our suppliers, including subcontractors, suppliers and partners, to adhere to our business principles as set out in this Code of Conduct and to share our commitment to fair and ethical business conduct inspired by the principles of sustainability in the conduct of business and the management of production processes.



COMPLIANCE WITH LAWS AND REGULATIONS

All DAE suppliers must, as a minimum, comply with all national and international laws and regulations in force in the countries in which they operate. Where the provisions of this Code of Conduct differ from applicable laws and regulations, suppliers shall adhere to the highest and most stringent standards between the two sources in order to pursue compliance with the requirements and principles contained in this Code of Conduct.



HEALTH AND SAFETY IN THE WORKPLACE

DAE expects its suppliers to do their utmost to maintain high standards of health and safety in the workplace.

DAE suppliers undertake to:

- Comply with all applicable health and safety laws, regulations and standards, as well as any additional health and safety requirements established by AED as a condition of supply.
- Provide a safe and healthy working environment to protect the health and safety of employees, protect third parties and prevent any risk of accident, illness and injury.
- Provide employees with appropriate personal protective equipment and training to encourage responsible and safe behaviour.



ENVIRONMENT

DAE believes that protecting the environment by minimising its environmental impact helps to secure the long-term future of its business. DAE expects its suppliers to give a similar priority to environmental protection in all relevant aspects of their operations.

DAE suppliers agree to:

- Comply with all applicable environmental laws, regulations and standards and maintain all required permits and licences.
- Respect the environment and control pollution, use resources efficiently and responsibly, use materials that minimise the environmental impact of operations and promote the recovery and reuse of waste.
- Set and achieve our own climate and environmental protection targets.



PROTECTION OF WORKERS AND HUMAN RIGHTS

DAE suppliers are expected to provide an inclusive working environment in which their employees feel respected and valued and in which they can make the most of their abilities, free of discrimination and harassment.

DAE suppliers agree to:

- Only employ workers who meet the legal minimum age requirements. Suppliers will comply with all applicable child labour laws and will not employ children under the age of 16 (or older in some countries).
- Determine the working hours and remuneration of employees in accordance with all applicable laws. Employees must be paid at least the legal minimum wage or, failing that, a wage that reflects local industry standards.

DAIKIN APPLIED EUROPE S.p.A.

Società unipersonale soggetta ad attività di direzione e coordinamento di Daikin Industries Ltd

Sede Legale/Operativa:
Via Piani di S. Maria, 72
00072 Ariccia (Roma), Italia
T +39 06 93 73 11
F +39 06 93 74 0 14

Sede Operativa:
Via Giuseppe di Vittorio, 8
20049 Calepio di Settala (Milano), Italia
Cap.soc. € 10.000.000,00 i.v.
PEC: dae@pec.daikinapplied.eu

Sede Operativa:
Via Giuseppe Ferrari, 31/33
36100 Vicenza, Italia
R. I. RM / C.F. 04878860586
R.E.A. 467651 - P.I. 01318801006

- Do not use or support the use of forced or compulsory labour or modern forms of slavery. All forms of work must be voluntary. Suppliers' employees shall be free to terminate their employment at reasonable notice and shall not be required to surrender passports or work permits as a condition of employment.
- Promote equal opportunities and do not discriminate against employees on the basis of race, nationality, gender, sexual orientation, gender identity, marital status, religion, belief, disability or age.
- Treat employees with dignity and respect and do not engage in behaviour that offends, humiliates or threatens others.
- Promote a culture that values diversity and inclusion in the workplace, including through employee awareness and training.
- Ensure that employees are free to join or not to join a trade union/workers' representative of their choice, without threat or intimidation.
- Respect human rights and the principles underlying the Daikin Group Human Rights Policy. ([humanrights_policy-pdf.pdf \(daikin.com\)](#))



ANTI-BRIBERY

DAE is committed to complying with all anti-corruption laws that prohibit acts of bribery to obtain or retain business or to obtain any improper advantage.

DAE suppliers agree to:

- Comply with all applicable anti-corruption laws in the conduct of its business.
- Not accept or offer, directly or indirectly, any form of bribe or other payment of a corrupt nature from or to any person or organisation, including government agencies, public officials, private companies and their respective employees.
- Ensure that any gifts or hospitality offered to DAE employees are reasonable in value and frequency and are not intended to improperly influence a business decision or compromise independence or judgement.
- Ensure that any third parties providing goods or services on behalf of DAE always act in accordance with these standards.



PRIVACY

DAE suppliers are required to comply with applicable data protection laws, to process personal data lawfully, fairly and for legitimate purposes and to retain it for no longer than is necessary for the purposes for which it was collected, and to ensure the cybersecurity of personal data and processed information in accordance with industry standards to protect it from threats, security risks or cyber-attacks.



CONFLICT OF INTERESTS

A conflict of interest is any personal, family or business interest that may affect the impartial and objective performance of an employee's or third party's duties. Such conflict of interest situations include critical relationships such as family or marital relationships, partnerships, shareholdings or investments in business partners or competitors. In order to build strong business relationships, suppliers shall promptly disclose any conflict of interest or situation that may present a conflict of interest.



ETHICS

DAE expects its suppliers to adhere to the highest standards of ethics and legality in their dealings with its employees, suppliers and customers.

Suppliers, in turn, are expected to ensure that their suppliers adhere to these standards in relation to activities carried out on behalf of DAE.



COMBATING TAX FRAUD

DAE's suppliers agree not to engage in, facilitate or support any form of tax evasion and to comply with accounting standards and provide DAE with true, correct and complete accounting information.



COMPETITION AND FAIR TRADING

DAE requires its suppliers to comply with competition laws and adhere to standards of fair trade and fair competition.



DISCLOSURE OF INFORMATION

DAE's suppliers undertake to fairly, accurately and non-misleadingly disclose and report information on business activities and performance in accordance with all applicable laws and regulations.



INTELLECTUAL PROPERTY PROTECTION AND CONFIDENTIALITY

DAE is committed to protecting its intellectual property and respecting the intellectual property rights of third parties, and therefore also requires its suppliers to respect the intellectual property rights and safeguard the confidential information of third parties.



PROHIBITION OF INSIDER TRADING

DAE is committed to protecting its intellectual property and respecting the intellectual property rights of others, and therefore requires its suppliers to respect the intellectual property rights and safeguard the confidential information of others.



PRODUCT AND EXPORT SECURITY

DAE is committed to providing safe and high-quality products and services and therefore expects its suppliers to share these objectives by continually seeking safer, greener and more advanced technologies, ensuring that high standards of safety and quality are maintained and that appropriate action is taken in a timely manner when product safety risks or issues arise.

DAE does not engage in activities that violate applicable export control laws and regulations. Accordingly, it requires its suppliers to agree to ensure that all products and services provided to DAE comply with all applicable international trade and export laws, rules and regulations.



BAN ON THE USE OF MINERALS FROM CONFLICT ZONES

"Conflict minerals" are minerals from conflict-affected or conflict-prone areas, the extraction and marketing of which may directly or indirectly fund armed groups or contribute to human rights abuses.

To ensure a sustainable supply chain, DAE suppliers commit to ensuring that their products do not contain 'conflict minerals' and to conducting sufficient due diligence on their supply chains to identify conflict-free smelters.



VIOLATIONS

Any suspected or actual violation of this Code of Conduct must be reported through the DAE reporting platform, accessible by computer and mobile phone at dae.secure-blowing.com. The report will be handled by DAE's Supervisory Body in accordance with Legislative Decree 231/01.



Remember that the information provided must be truthful, accurate and complete in order to allow for the necessary preliminary and investigative activities related to the report.

In the event that any report is found to be defamatory or libellous, Daikin Applied Europe shall have the right to immediately terminate the existing contract with the supplier, in addition to the criminal and civil consequences for the person making the report.



RECIPIENTS

This document is binding on all of DAE's suppliers (including subcontractors, sub-suppliers and partners) and, together with the Code of Ethics and the Organisational Model pursuant to Legislative Decree 231/2001, forms an integral part of the contractual relationship with the Company. In particular, in the performance of its contractual relations with DAE, the suppliers must ensure that - their personnel - their suppliers and related personnel are adequately informed of the contents of this document and operate in accordance with the relevant principles of conduct.

Suppliers also agree to allow DAE and/or its authorised representatives to conduct audits of compliance with this Code of Conduct.

Daikin Applied Europe S.p.A.

January 2025