

Policy for whistleblowing

Daikin Europe Group

1 March 2024

1. Introduction

At Daikin we are committed to conduct our business in a transparent way. We strive for full legal compliance wherever we operate. Across the Daikin Europe Group¹ employees are held to our Group Corporate Ethics code, which promotes proper conduct and aims to make sure no illegal activities takes place on the work floor. The principles of our Corporate Ethics are the same for each country and business sector we operate in. You can find our Corporate Ethics on our Internet site, www.daikin.eu.

We encourage everyone to raise their questions or concerns and to report (suspected) unethical or illegal behavior in our business practices. The Daikin Europe Group guarantees submitted reports are handled in full confidentiality.

In this policy we explain how you can submit a report and how we carry out our investigations following a submitted report. We also explain the protection offered to anyone who submits a report.

2. Who can submit a report?

Anyone can report suspected or observed misconduct at the Daikin Europe Group: employees, as well as external stakeholders such as contractors, consultants, service providers, agents, customers, and so on.

3. Where can I submit a report?

There are multiple ways to report. You can choose the channel which you feel most comfortable with.

- You can report to your contact person at Daikin.
- You can submit a report through the whistleblower hotline, available 24/7. The hotline accepts reports through an online form or by phone, each time in your preferred language. You can access the hotline via following link: <http://daikineurope.ethicspoint.com>.

To proceed with a report, access the link and go to the section *"To Make a Report"*.

- Select your country, and indicate your preferred method of reporting, online form or by phone. When you proceed with phone, your country-specific phone number will appear.
- In all cases, you will receive a user ID and a password. Questions and communication will be shared with you through the platform. You can revisit the platform at any stage and leave documents or ask further questions.
- In some countries we have a specific reporting channel, available on the website of the local entity².

4. Can I report anonymously?

That option is available, though in some countries it may not be legally possible³. You can raise incidents anonymously, though in some countries this may not be permitted. We ask you to provide sufficient detail and factual information so that we can investigate the report effectively.

5. What kind of incident can I raise?

You can raise any kind of concern that you want to bring to our attention, but this policy aims at receiving reports about violations or suspected violations of Daikin Europe Group's corporate ethics, or the law. Such violations can for example be a breach of human rights, a violation of competition law, a criminal offence or causing damage to the environment.

6. Am I protected when I report an incident?

Daikin is committed to protect you from any disadvantages, even if after an investigation it appears that there was no violation. We do not tolerate retaliation in any form (dismissal, denial of promotion, a suspension, ...) against persons who report in good faith, with reasonable grounds to believe there was a violation.

However, if you knowingly report or publicly disclose false information, you may face a penalty. You may also face claims for compensating damages that result from false reporting or public disclosure of false information.

7. How we secure confidentiality.

Daikin treats all reports, its content, the identity of the reporting person and of others involved confidentially. We will use your report for carrying out an investigation and for the implementation of any measure in connection with the outcome.

We may disclose information about facts or concerns in the framework of a legal action or other procedure that an authority initiates. We may also disclose

information if we decide that the violation should be reported to the authorities and/or that we will file an official complaint. We may also disclose the content of the report to management and/or to our external advisors.

8. What happens after I submitted a report?

We take all reports seriously, and they are handled with due care.

The Daikin Europe Group's Audit Committee or – where required by law – a local representative, is responsible for investigating the reports received. The Audit Committee / local representative will take the following steps after receiving a report:

- Within 7 days the Audit Committee sends an acknowledgment of receipt to the reporting person.
- Then the Audit Committee decides whether the report is admissible or not. In case the report is not admissible – because it falls outside the scope of this Policy – the Audit Committee informs the reporter.
- If the report is admissible, the Audit Committee carries out an investigation.
 - The Audit Committee may request the assistance of others such as subsidiaries or business departments.
 - The Audit Committee may interview employees and/or third parties who might know about the reported incident.
 - The Audit Committee will review documents that relate to the reported incident.
- After completion of the investigation the Audit Committee decides on the matter.
 - If the matter is confirmed, the Audit Committee will take the appropriate action to address the identified concerns.
 - If the identified incident is not confirmed, the matter will be dismissed.
- The Audit Committee informs the reporting person within 3 months about the outcome.

The Audit Committee fully respects the rights of defense of any person involved in an investigation. These persons will receive information about the facts or concerns and will be heard.

A violation of the Corporate Ethics may lead to a disciplinary measure or to a termination of the employment. If a violation is committed by a third party, we may terminate the contractual relationship with such party or their employer.

9. How we comply with data protection laws.

The handling of reports involves processing of personal data. Depending on the incident, the Daikin Europe Group may collect data like names, contact information, job titles, system access logs, and details related to the incident.

We retain your personal data for the duration of the investigation. We may keep them for some time afterwards, based on our risk assessment and legal requirements, but never longer than longer than allowed under the applicable laws. For specific data types (e.g., access logs), shorter retention periods may apply. We may retain data for longer periods based on a legitimate interest, such as for potential future litigation or regulatory inquiries, but we will do so in accordance with data minimization principles and your rights.

Please note that you have the right to:

- Access your personal data and receive a copy.
- Rectify inaccurate or incomplete personal data.
- Erase your personal data in certain circumstances.
- Restrict the processing of your personal data.
- Object to the processing of your personal data based on legitimate interests.
- Obtain your personal data in a portable format.
- File a complaint with the Data Protection Authority of the country where the incident has been reported.

For detailed explanations and to exercise your rights, please contact the Data Protection Coordinators at dpc@daikineurope.com.

For more information about our data protection practices, please see our Data Protection Policy⁴.

10. Whistleblower procedure and protection in the European Union

In the European Union the laws of the EU Member States and the so-called EU Directive⁵ provide protection to persons who report (alleged) breaches of law (“whistleblowing”).

The conditions to enjoy such protection are the following. Please familiarize yourself with the specific requirements of the applicable law:

- You must have had reasonable grounds to believe that the information was true at the time of reporting and that such information fell within the scope of the law;
- You reported internally or externally or made a public disclosure in accordance with the law.

Internal reporting means that you used one of the reporting channels of the Daikin Europe Group. You are encouraged to use these first.

Reporting externally means you submit a report to the competent authorities in the EU Member State. These competent authorities are listed in annex 1. You can use the external reporting channel after you reported through the Daikin Europe Group's internal channel and this internal channel did not function properly.

Making a public disclosure means that you report directly to the public through for example an online platform or social media or to the media. When making a public disclosure you should enjoy protection if

- you first reported internally and externally, but the breach remains unaddressed or no appropriate action was taken, or
- you have reasonable grounds to believe that there is an imminent or manifest danger to the public interest or in the case of external reporting, there is a risk of retaliation.

Not all matters that fall within the scope of Corporate Ethics are whistleblowing. We refer to these as "ethical matters". The protection provided by law for a person who raises an ethical matter is not the same when reporting a whistleblowing. Nevertheless the Daikin Europe Group will treat reported ethical matters in the same way: the guidance and processes of this Policy apply to all reports that we received, regardless whether a whistleblowing or an ethical matter.

11. Questions

In case you have any questions, you can contact C. Vyncke, Director and Chief Legal Officer, Daikin Europe N.V.

Mail: vyncke.c@daikineurope.com

ANNEX 1: Relevant competent authorities to receive an external reporting

Austria	External Reporting Office for EU Legal Violations in Vienna
Belgium	Federal Ombudsman Vlaamse Ombudsman Ombudsman of the Brussels-Capital Region Ombudsfrau der Deutschsprachigen Gemeinschaft Belgiens
Bulgaria	Commission for Anti-Corruption and Illegal Assets Forfeiture
Croatia	Ombudswoman of the Republic of Croatia

Cyprus	To identify the proper channel through which to report whistleblowers can contact local legal counsel and/or the ombudsman's office.
Czech Republic	Ministry of Justice, Conflict of Interests and Anti-Corruption Department
Denmark	Danish Data Protection Authority
Estonia	Ministry of Justice, Estonian Criminal Policy Department
Finland	Ministry of Justice
France	Defenseur des Droits
Germany	The External reporting body pursuant to the Draft Law on Whistleblower Protection at the Federal Office of Justice of Germany (Germany)
Greece	National Transparency Authority
Hungary	Commissioner for Fundamental Rights
Ireland	Garda Ombudsman, GSOC Protected Disclosure Unit (PDU)
Italy	Autorità Nazionale Anticorruzione (ANAC)
Latvia	State Chancellery, Contact Point of Whistleblowers
Lithuania	Prosecutor General's Office
Luxembourg	The Luxembourg Financial Services Authority - CSSF The Luxembourg Insurance Commission - CAA The Luxembourg competition authority The Luxembourg Registration Duties, Estates and VAT Authority - AED The Luxembourg Inspectorate of Labour and Mines - ITM The Luxembourg Data Protection Commission - CNPD The Luxembourg Equal Opportunities Centre - CET The Mediator, as part of his mission to carry out external checks on places where people are deprived of their liberty The Ombudsman for children and youth

	<p>Luxembourg Regulatory Institute - ILR</p> <p>Luxembourg Independent Regulator for Audiovisual Media Services - ALIA</p> <p>Luxembourg and Diekirch Bar Association</p> <p>Luxembourg Chamber of Notaries</p> <p>Luxembourg Medical Board</p> <p>Nature and Forest Administration - ANF</p> <p>Water Management Administration - AGE</p> <p>Air Navigation Administration - ANA</p> <p>National Consumer Ombudsman Service</p> <p>Order of Architects and Consulting Engineers - OAI</p> <p>Luxembourg Association of Chartered Accountants - OEC</p> <p>Luxembourg Institute of Auditors - IRE</p> <p>Luxembourg Direct Tax Administration – ACD</p>
Malta	<p>Malta report externally to one of the competent authorities mentioned in the law. These include:</p> <p>the Commissioner of Revenue (CfR), Financial Intelligence Analysis Unit (FIAU), Malta</p> <p>Financial Services Authority (MFSA), Commissioner for Voluntary Organisation (CVO),</p> <p>Permanent Commission Against Corruption and the Ombudsman.</p>
The Netherlands	Huis voor Klokkenluiders (the Netherlands)
Poland	the Ombudsman (though the final law is not yet adopted – January 2024)
Portugal	Prosecutor General
Romania	Ministry of Justice
Slovakia	Prime Minister’s Office / Corruption Prevention Department

	Whistleblower Protection Office
Slovenia	Komisija za preprečevanje korupcije
Spain	Agencia Valenciana Antifraude Ministerio de Justicia Oficina Antifrau de Catalunya Prevention and Fight against Corruption Office of the Balearic Islands Oficina Andaluza contra el Fraude y la Corrupción
Sweden	Swedish Work Environment Authority

1 The Daikin Europe Group consists of Daikin Europe N.V. and Daikin Europe Coordination Center N.V., their branches and subsidiaries, as well as the respective branches and subsidiaries of those branches and subsidiaries.

2 See the websites of the entities based in Italy.

3 When you are in or report related to Czech Republic or Hungary you should seek advice before reporting anonymous since the anonymous reporting may not receive protection provided by national law.

4 https://www.daikin.eu/en_us/data-protection-policy.html

5 Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law