



Infineon Responsible Raw Materials Policy

April 2026

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Scope and Purpose

Semiconductor industries use different mined raw materials to manufacture semiconductor devices and related products. Each of these raw materials has specific and important electrical properties that are necessary for the functionality of the products. Mining is, by its very nature, a process that can entail various potential social and environmental risks. Social and environmental responsibility in all operations and global supply chains is a fundamental part of Infineon's corporate strategy. To respect people and planet, responsible sourcing of raw materials is crucial. We intend to strengthen our commitment to this approach in the future and continue to improve in this area.

Another key aspect of Infineon's sustainable supply chain management in raw material supply chains relates to the use of secondary materials and the aim to gradually increase the share where technically feasible. This approach supports the company's commitment to resource efficiency and circular economy principles.

The purpose of this Responsible Raw Materials Policy (formerly the Conflict Minerals Policy) is to outline Infineon's responsible sourcing strategy for the mined raw materials listed under the "Fields of Action" section. This includes due diligence practices in raw material supply chains that aim to prevent human rights and environmental risks and to remediate possible abuses. This policy also sets our expectations for our suppliers in this regard.

This Responsible Raw Materials Policy supports our overall CSR Framework for the focus areas of Sustainable Supply Chain Management, Human Rights and Environmental Sustainability which are reflected in our Corporate Social Responsibility (CSR) Policy. It is complementary to our Human Rights Policy and Supplier Code of Conduct and applies to Infineon Technologies AG and all affiliated companies, collectively referred to in the following as "Infineon" and our direct suppliers and their supply chains.

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Our Commitment and Expectations

International Standards and Principles

Respect for human rights and environmental protection is a top priority for us. Therefore, Infineon is committed to conducting business in compliance with applicable laws and regulations following internationally recognized principles and standards. These include, but are not limited to, the following:

- The Code of Conduct of the Responsible Business Alliance (RBA)
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (OECD Guidance)
- The UN Guiding Principles on Business and Human Rights (UNGPs)

Responsible Sourcing Practices

Infineon addresses conflict and other high-risk raw materials in its supply chain, aiming to contribute to the prevention and mitigation of human rights and environmental risks associated with these materials. We strive to ensure that our products do not contain Conflict Minerals (3TG), which are minerals (Tantalum, Tin, Tungsten, Gold) that directly or indirectly finance or benefit armed groups or conflicts in areas such as the Democratic Republic of Congo and adjoining countries¹. However, our goal is not to ban sourcing from these regions but to promote sourcing from responsible sources there.

Infineon therefore expects its suppliers to:

- Comply with due diligence principles, standards, or applicable laws, as listed in the Annex of Infineon's Supplier Code of Conduct.
- Establish an appropriate management system for conducting due diligence in accordance with the OECD guidance or any other nationally or internationally recognized supply chain due diligence standard of equivalent nature.
- Develop and maintain due diligence practices to ensure that all raw materials they supply are conflict-free and sourced responsibly. This can include participation in independent third-party audit schemes such as the Responsible Minerals Assurance Process (RMAP) by the Responsible Minerals Initiative (RMI) but is not limited to them. Suppliers shall urge relevant smelters and refiners identified in their supply chains to complete such an audit and increase the coverage of audited smelters. Those smelters and refiners which have not passed or are unwilling to participate must be removed from the supply chain.
- Evaluate opportunities and incorporate secondary materials where technically and qualitatively feasible, and to transparently communicate recycled content where available.

Supply Chain Transparency and Reporting

Sustainability risks in complex global supply chains and regulatory requirements, such as the Dodd-Frank Act, the Corporate Sustainability Due Diligence Directive (CSDDD) or the Corporate Sustainability Reporting Directive (CSRD), necessitate the risk-based analysis of the entire supply chain and the collection and reporting of raw material-related data.

Infineon therefore expects its suppliers to:

- Upon request submit information on raw materials they supply to Infineon using the standardized Conflict Minerals Reporting Template (CMRT) and/or the Extended Minerals Reporting Template (EMRT) issued by the RMI.

¹ Presently Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia

- Strive to map their supply chains from raw materials to the finished goods sold to Infineon and require the same of their suppliers. Upon request, when we determine that such information is deemed necessary to comply with legal obligations, our suppliers shall agree to make every reasonable effort to provide Infineon with supply chain mapping data and documented chain of custody information.
- Provide environmental performance indicators for the delivered products and materials such as carbon footprint information or share of secondary materials per substance (e.g., copper).

We commit to using and protecting all information in an appropriate manner, and to ensuring that sensitive data is properly collected, processed, and managed.

Policy Compliance

Infineon aims to maintain a supply chain consisting only of responsibly sourced raw materials. In the event of non-compliance with the requirements herein, remedial actions may be taken, which could include reassessing supplier relationships. Suppliers must inform Infineon in writing without undue delay about any non-compliance with the requirements in this policy. They should also immediately perform corrective actions. This applies to non-compliances concerning the supplier's own operations and the supplier's own supply chain, including the extracting, processing, transporting, trading, and handling of raw materials or parts containing them.

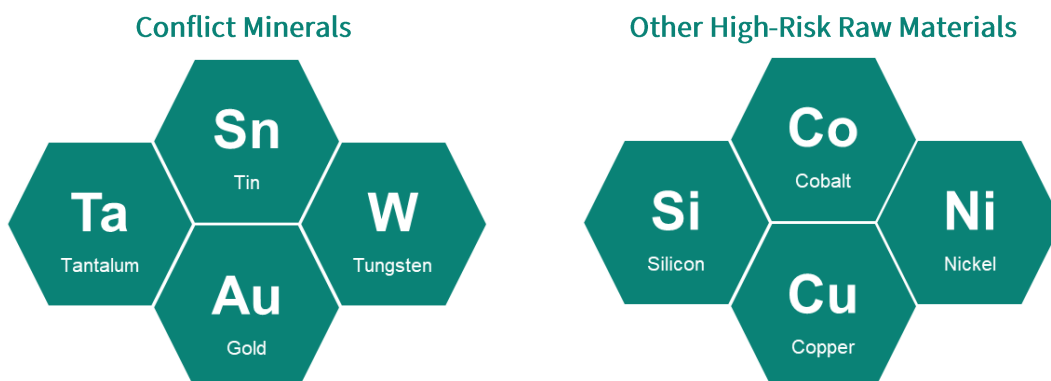
Our Fields of Action

The mining and processing of raw materials can lead to various human rights and environmental risks, including child labor, forced labor, and environmental pollution. Infineon does not source raw materials directly, but we recognize the possibility that raw materials related to human rights and environmental risks could enter our products through the supply chain. Therefore, we aim to identify their provenance in close cooperation with our direct suppliers.

Infineon is taking systematic steps to avoid the use of raw materials in its supply chains that directly or indirectly finance or benefit armed groups in conflict-affected and high-risk areas, such as the Democratic Republic of Congo (DRC) and adjoining countries. We work closely with our suppliers to remove those smelters from the supply chains which have not passed or are unwilling to participate in independent third-party conflict audit process.

Our Responsible Raw Materials Policy aims to highlight the prevention and mitigation of all human rights risks identified or referred to in documents such as the Annex II of the OECD Due Diligence Guidance for Minerals from Conflict-Affected and High-Risk Areas or equivalent standards, as well as human rights and environmental protection regulated in laws such as the German Supply Chain Due Diligence Act or the EU Corporate Sustainability Due Diligence Directive (CSDDD).

We regularly review and update our list of prioritized high-risk raw materials as part of our responsible sourcing practices. In addition to our existing focus on conflict minerals (3TG) and cobalt, we broaden our scope to encompass other high-risk raw materials and will define appropriate risk mitigation measures for these materials.



Our Responsible Raw Materials Framework and Implementation Approach

Infineon has established a responsible raw materials framework in accordance with the OECD Guidance to ensure compliance with applicable laws and regulations, to implement standardized raw material-related due diligence obligations in global supply chains, and to facilitate continuous improvement.

The framework consists of the elements depicted below:

Reporting and Communication

Reporting on risks and due diligence activities

Continuous Improvement

Regular review of risk management and associated processes



Guidance and Commitment

Commit to internal and external principles, processes and objectives

Risk Identification and Assessment

Identification of relevant raw materials, risk analysis and prioritization

Risk Prevention and Mitigation

Implementation of risk prevention and mitigation measures related to prioritized high-risk raw material supply chains

Guidance and Commitment

Infineon's Responsible Raw Materials Policy and associated documents outline the actions and expectations for our supply chains in the pursuit of implementing responsible sourcing practices. We have established structures and defined responsibilities to ensure the implementation of this policy and its associated due diligence obligations.

Risk Analysis

Infineon identifies the relevant raw materials, conducts specific risk analyses, and prioritizes high-risk raw materials through in-depth assessments. Infineon also aims to conduct a supply chain-specific evaluation of risks related to prioritized high-risk raw materials, which enables us to address the most salient risks and lay the foundation for effective supplier collaboration.

Risk Prevention and Mitigation Approach

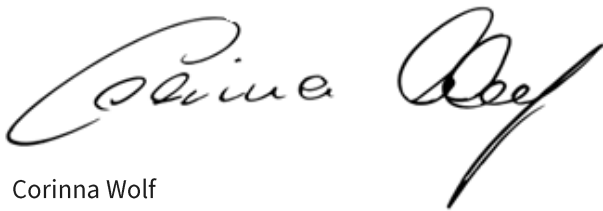
Infineon is committed to preventing and mitigating identified risks associated with high-risk raw materials in their products. To achieve this, we aim to implement a multi-level approach that combines general, cross-industry, and supply chain-specific responsible sourcing measures, leveraging technology wherever feasible. This approach will include defining due diligence expectations and strategies, as outlined in our Responsible Raw Materials Policy, and

providing training on these expectations. In addition to multi-tier supply chain collaboration along individual supply chains, Infineon recognizes the value of industry-wide initiatives in promoting responsible sourcing practices. As an active member of the RMI, we consider multi-stakeholder initiatives and the introduction of responsible sourcing standards in global supply chains to be key drivers for effective responsible sourcing.

Improvement and Reporting

Infineon reviews and updates its due diligence concept to maintain effective risk management and ensure responsiveness to new risks, regulatory changes, and industry developments. Infineon is not listed on US stock exchanges and therefore not legally required to publish a report on conflict minerals. Nevertheless, we uphold our commitment to this responsibility within the supply chains and report based on CMRT and EMRT. This reporting supports Infineon's customers who are required to report annually based on the Dodd-Frank Act. Infineon publishes information annually in the Infineon Annual Report on the implementation of responsible sourcing practices in raw material supply chains.

For more information on, please visit our [Sustainable Supply Chain Management](#) and [Human Rights](#) webpages.

A handwritten signature in black ink, appearing to read 'Corinna Wolf', with a stylized flourish extending from the end.

Corinna Wolf
Head of Global Sustainability

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