Global Umbrella Regulation 0.2

# Business Conduct Guidelines (BCG)

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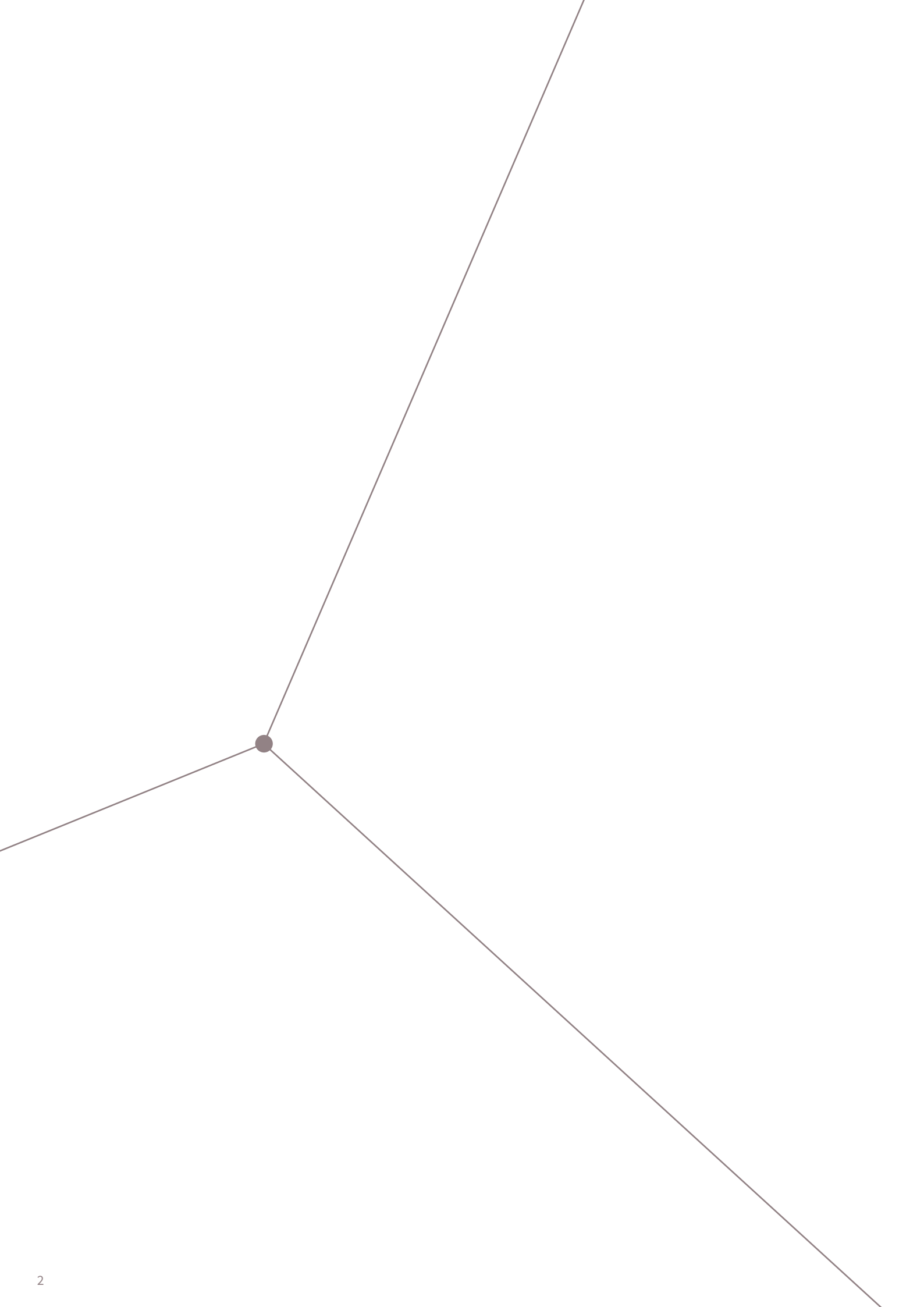
|---|---|---|---|---|---|
| Summary | The BCG are the Code of Conduct of Infineon. The BCG must be lived by every one every day. | | | | |
| Scope | Infineon worldwide | | | | |
| Intranet homepage of this Rule | **Always check the intranet homepage of this rule for updates.**<br>The homepage provides the full context of this rule in the latest state. You will find references to the most recent versions of<br>• this rule document<br>• supporting documents that may be enforced through this rule<br>• hints and links to other regulations or resources that are relevant in the context of this rule | | | | |



# Business Conduct Guidelines

## Infineon’s code of ethics



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# Business Conduct Guidelines

Dear Colleagues,

Infineon is a reliable partner. This is a promise we make to our business partners, investors, employees, and the general public. In return, we ask them to place their trust in us. We rely on your personal responsibility and integrity, and we are confident that we can honor our promise.
But how can we ensure we behave in a legally and ethically correct manner in every single situation?

The Business Conduct Guidelines (BCG) are a binding set of principles that help us make autonomous decisions in the execution of our duties. Compliance with these guidelines protects us and our company against inappropriate behavior.

However, we also want to facilitate our day-to-day activities. In practice, we rely on good common sense. If there are any doubts, asking yourself a few simple questions might be helpful:

- Am I behaving correctly and not acting in my own interest?
- Is my action or decision legal? Does it conform to the letter and spirit of the Business Conduct Guidelines and other internal regulations?
- Does my action or decision safeguard Infineon's reputation as a company with high ethical standards?
- Does my action or decision pass the "publicity test", i.e. convey a positive image of Infineon in public or social media?

If we can answer these questions with "yes", then it is very likely we are making the right decision. If in doubt about any particular situation, contact your manager or your Compliance Officer.

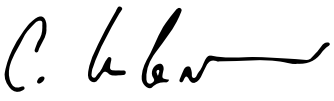
Every one of us contributes to the success of Infineon. Inappropriate behavior, even by one single employee, can cause considerable damage to Infineon and could have adverse financial consequences. By keeping the Business Conduct Guidelines in mind while at work, we ensure that we are acting in accordance with current laws and are complying with internal requirements.

Please read the Business Conduct Guidelines carefully. Use them as a guide for your day-to-day behavior and your business-related actions and decisions. This will allow us to combine entrepreneurial success with responsible behavior – and enable us to honor our promise.

Thank you for your support!



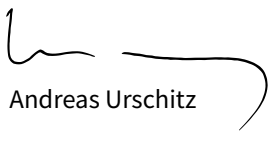
Jochen Hanebeck



Constanze Hufenbecher



Dr. Sven Schneider



Andreas Urschitz



Dr. Rutger Wijburg

## At a glance

› The Business Conduct Guidelines apply to all Infineon employees worldwide

› Answers to legal and ethical questions



# 2. Preamble

Integrity is our guiding principle in dealings with our customers, shareholders, business partners, employees, and the general public.

These guidelines provide an overview of important regulations that are intended to provide support in legal and ethical questions. The BCG must be lived by every one every day. Only then can we live up to our goal of acting responsibly and legally.

The BCG apply to all persons employed at Infineon and members of corporate bodies of Infineon Technologies AG and its affiliates worldwide and are absolutely binding for all of us. However, they cannot, by their nature, answer all questions we may encounter in our everyday work.
We therefore need to be committed to the letter and spirit of the BCG and be guided not only by what is legally permitted, but also what is ethically right.

# 3. We comply with the law and keep our promises

Violations of the law can cause great damage: fines, claims for damages or an impairment, or loss of reputation – for the company worldwide and individual employees.

Compliance with the law is therefore the prime obligation for us at all times and all places in the world. Lawful behavior always has absolute priority. This applies even if an individual believes this behavior may be counter-productive or may not support their business or financial goals.

Any Infineon employee who commits an offense must expect disciplinary consequences as a result of breaching his or her employment obligations. In severe cases that might even result in termination of employment.

Our integrity is a valuable asset. Therefore, our ethical standards have to go even beyond legal requirements: We only promise what we are able to deliver – and we live up to our promises. Our reliability and the quality of our products, services, and communication are of utmost importance in order to earn the trust of customers, investors, and colleagues. Betraying this trust, for example by compromising on quality in development or production, might jeopardize the success of the whole company, even if it seems to be a minor issue.



## At a glance

- Prevailing law is a binding framework
- Violations of regulations have consequences
- Promises are honored

## At a glance

- Fair competition is paramount
- Always comply with antitrust and competition law
- Contacts with competitors must be notified
- Corruption is not compatible with Infineon's culture
- Acceptance of valuable gifts and invitations only in exceptional cases
- Ensure transparency in potential conflicts of interest
- No sideline work for or collaboration with a competitor
- Scrutinize the integrity of business partners
- Prevent money laundering



# 4. We are fair market players

## 4.1 We abide by competition and antitrust law

We are committed to fair competition for the benefit of all market participants. Every one of us is obligated to comply with competition and antitrust law regulations when dealing with business partners or third parties. There are no exceptions; violations are not tolerated.

Restrictive agreements with competitors, customers, suppliers, or distributors are strictly prohibited. Abusing a dominant market position is also prohibited. Due to the high risk of an illegal exchange of information, specific contacts with competitors must be notified to Compliance. More detailed regulations can be found in the Global Rule “Antitrust Law”.

## 4.2 We reject corruption

We want to compete and win over customers by virtue of the quality of our products and value of our services – not through unfair means. Corrupt conduct is not compatible with our culture and is not tolerated. The mere impression of corruption must be avoided at all times. Infineon supports national and international efforts to combat corruption. We reject bribery, in whatever form.

None of us may exploit the company’s connections to their own advantage or that of a third party and thus adversely affect Infineon. Accepting private benefits from third parties (such as money, services, or discounts) is prohibited because they may impede objective business decisions.

In contacts with government bodies, we never make payments or give any kind of benefits to officials in order to gain orders or advantages for Infineon. If officials or business partners ask for or offer a personal benefit, you must not consent under any circumstances and must notify your manager and the Compliance Office immediately. More detailed regulations can be found in the Global Rule “Anti-Corruption”.

## 4.3 We accept valuable gifts and invitations only in exceptional cases

Gifts may be made or accepted only if permitted under the local legal system and only if decisions are not and may not be perceived as being influenced by them. The same applies to invitations to events, lunches, or dinners and to other benefits of any kind.

To protect the individual employee and the company, potentially critical situations require the prior approval of the responsible Compliance Officer or a person authorized by the latter. More detailed regulations can be found in the Global Rule “Gifts & Invitations”.

Gifts and other benefits may be subject to income tax on benefits-in-kind. All applicable tax regulations must be observed.

## 4.4 We deal with conflicts of interest openly

We respect the personal interests and private life of all employees. We take great care in avoiding conflicts between private and business interests or even the mere impression thereof. Employees must disclose possible conflicts of interest in business decisions to their manager. Personnel decisions must also not be influenced by private interests or relations. The following applies specifically:

**We disclose our participating interests**
Infineon employees must actively notify their manager and the HR department in writing if:

- they hold or acquire a direct or indirect participating interest in a competitor and can influence the management of that company
- they hold or acquire a direct or indirect participating interest in a business partner of Infineon and have dealings with the company in question as part of their work

The same applies if related persons (e.g. family members) hold or acquire such participating interests.

**We disclose our sideline work**
Paid sideline work and seats in other business enterprises (such as on the Management Board, Administrative Board, Supervisory Board or equivalent) must be reported to the manager for approval. The request may be rejected if:

- it adversely affects the employee's work
- it conflicts with the employee's duties at Infineon
- there is the risk of a conflict of interest

Any direct or indirect activity for a company that is in direct or indirect competition with Infineon is prohibited.

Occasional writing activities, lectures, or charitable activities are not deemed to be sideline work.

## 4.5 We choose our business partners carefully

We likewise expect our business partners to act with integrity in their business dealings. That is why, as and when required, we scrutinize our business partners to ascertain whether they provide safeguards to ensure compliance with the law and abide by the human rights and social standards acknowledged by Infineon. We will not enter into a business relationship with a partner who violates relevant national laws or international conventions, conceals its true identity or ownership structure, launders money or finances terrorism, or with a partner who fails to make appropriate efforts to correct such situations.

We expect our suppliers to meet the requirements defined in our “Supplier Code of Conduct” (former “Principles of Purchasing”).

## 4.6 We prevent money laundering

Money laundering, the introduction of illegally earned money into the legal business and financial system, e.g. by exchange or transfer, is a crime in many countries. Everyone at Infineon is obliged to comply with German and foreign regulations on money laundering at work.
This includes the duty to obtain adequate information on the contractual partner’s business environment, the contractual partner itself, and the purpose of its intended business transaction before the transaction takes place.
If there are doubts or suspicions about whether financial transactions are permissible, the responsible Compliance Officer must be consulted immediately.

## 4.7 We comply with export control laws

We observe the export control and customs regulations of the countries in which we do business. Employees entrusted with importing, exporting, or transferring goods, services, hardware, software, or technology are obliged to comply with prevailing sanctions programs, export control and customs laws, and regulations, as well as guidelines and processes in their work.

# 5. We treat each other with respect

## 5.1 We observe and protect human rights and basic social rights

We are especially committed to respecting and protecting human rights and have undertaken to uphold the principles of the United Nations Global Compact in relation to human rights, labor standards, the environment, and anti-corruption.

We also observe and promote the basic fundamental principles defined in the conventions of the International Labor Organization, such as:

- the protection against discrimination in selection, hiring, occupation, and promotion of employees
- the right to form employee representative bodies
- the rejection of child labor and any form of forced labor

We abide by local statutory requirements and grant in particular the following in accordance with regional conditions:

- fair pay and fringe benefits
- reasonable working hours
- paid vacation

We comply with the regulations on the legal minimum age and the special protective regulations for employment of minors.

## 5.2 We promote an employee culture of openness and respect

Mutual respect should be at the core of our collaboration. Employees from 110 countries work at Infineon.
This diversity sets us apart and makes Infineon a successful international company.

We expect all employees to follow our zero tolerance policy on discrimination and harassment.

No one may be personally attacked, disadvantaged, harassed, or excluded because of their ethnic origin, skin color, nationality, faith, ideology, gender, age, disability, marital status, social origin, union or political affiliation, appearance, sexual identity, or orientation. We take decisive action against any form of discrimination, sexual harassment, physical violence, physical coercion, or verbal abuse.

Professionalism and performance are possible only in a working climate founded on respect, trust, tolerance, and fairness.

In personnel decisions such as selection, hiring, promotion, change of job, compensation, evaluation, and training of our employees, we are guided by the principle of equal opportunity and criteria such as qualification and performance.



## At a glance

- Observe human and social rights
- Practice and set an example for a culture of respect
- Lead by example
- Respect employee representative bodies
- Promote preventive healthcare and work safety

## 5.3 We lead by example

We want to create an environment that opens up personal and professional prospects for our employees. Our leadership style should empower employees to achieve outstanding performance and results. We therefore expect our managers to behave as role models. They should give guidance through their performance, openness and social skills and ensure a good working atmosphere.

Managers place trust in their employees and give them as much personal responsibility and freedom as possible. They set clear, ambitious, yet realistic objectives, acknowledge their employees' achievements and provide freedom for ideas and innovations. As part of their management duties, they prevent unacceptable conduct and are responsible for ensuring there are no violations of the regulations that could have been avoided by due care and supervision within their sphere of responsibility.

## 5.4 We value employee representative bodies

We respect and acknowledge the right of employees to form representative bodies to conduct collective bargaining negotiations on working conditions. The management at the locations and the employee representative bodies must work together closely in a spirit of trust. This is the basis for a constructive and cooperative dialogue, with the aim of achieving a fair balance of interests.

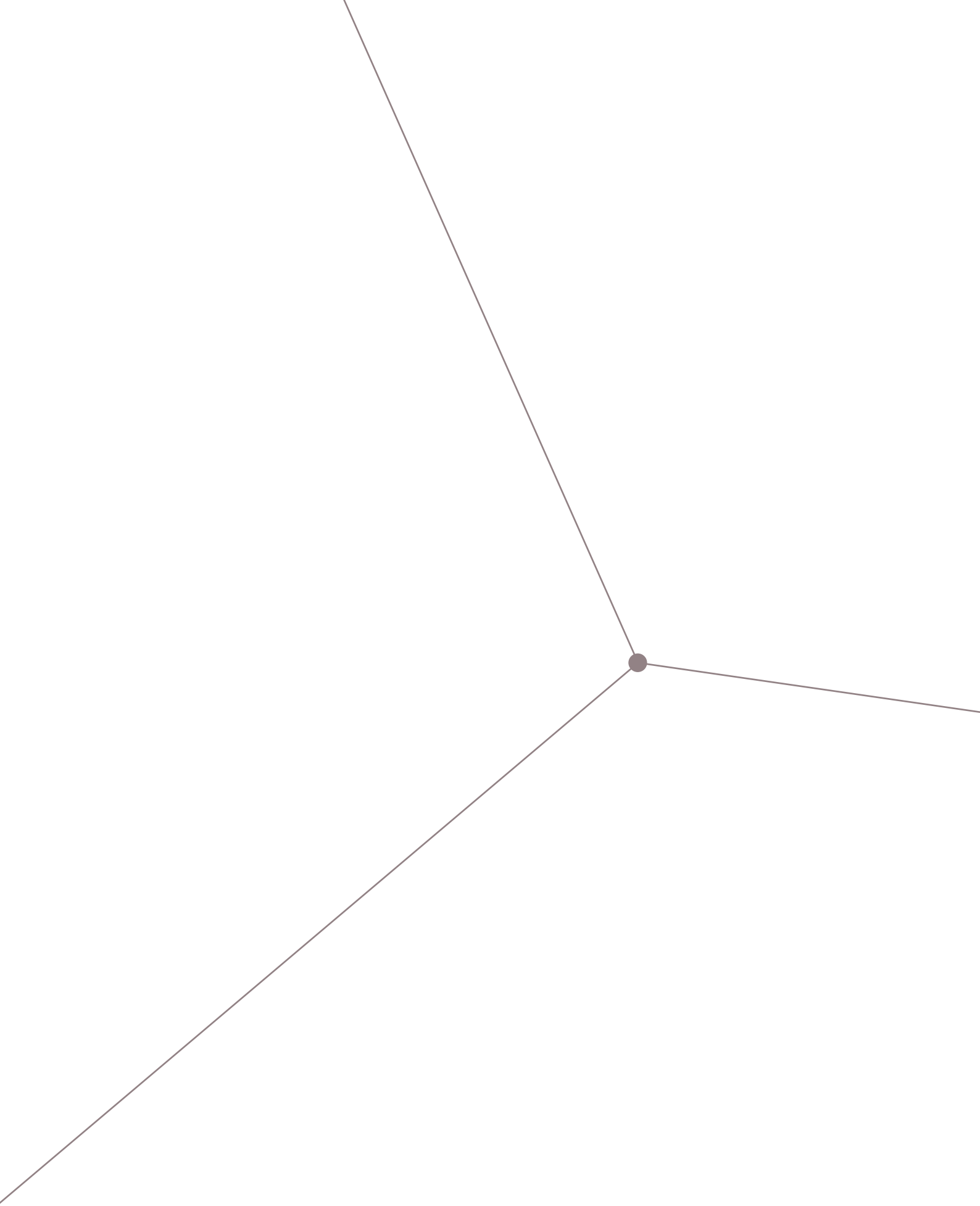
Even in the event of disputes, we still strive to maintain a sustainable working relationship.

## 5.5 We promote health and safety at work

Ensuring safety at work and promoting and preserving the health of employees are key objectives of the company. By means of continuous improvements in the working environment as well as through diverse prevention and health-care campaigns, we help to achieve these goals.

We believe strengthening personal health literacy is an opportunity for every one since it also helps us maintain our performance and work satisfaction. Health and work safety can be significantly influenced by employees' personal behavior – every one is obliged to avoid risks to their own health by acting prudently, and to report shortcomings or gaps in work safety to their manager.

We also organize our working environment in such a way that a good work-life balance can be achieved.



## At a glance

- Treat company property with care
- Maintain documentation neatly and transparently
- Always observe data protection requirements
- Safeguard company secrets
- Never exploit insider knowledge



# 6. We handle company equipment and information carefully

## 6.1 We treat the property of Infineon with care

Infineon's assets also include operating and work equipment. We always treat such equipment properly and carefully and protect it against loss, theft, damage, or misuse. We use the equipment solely for the company's purposes. Occasional private use is permitted, as long as it is in line with internal policies and is not done to commit crimes or regulatory offenses, or to divulge business secrets.

Information that incites hatred, glorification of violence or other crimes, or information with content that is sexually offensive against the respective cultural background must never be downloaded or disseminated.

## 6.2 We protect Infineon's intellectual property

The company's intellectual property is at the core of our commercial success. Protecting our intellectual property rights, such as patents and brand names, as well as our technical know-how is therefore a primary obligation of all employees. We acknowledge and respect the intellectual property of our competitors and business partners and use it only with their explicit permission or where legally permitted.

## 6.3 We safeguard company secrets

Every one of us is obliged to maintain confidentiality of business and company secrets and other non-public information that is entrusted to us or which we otherwise become aware of as part of our work. This relates to all internal matters of the company, such as details of its organization, as well as matters relating to business, production, research and development, and company figures, unless they are already in the public domain. Inquiries from the media and analysts must always be passed on to the respective public or investor relations unit. Anyone who acts as a representative of Infineon externally or who could be perceived as being a representative of Infineon, but is not authorized to act as one, should make it clear that they are acting in a personal capacity.

This applies in particular to social media. Infineon's Social Media Guidelines must be observed.

Likewise, we respect and protect the business and trade secrets of other companies. We only use information from third parties if we have obtained it from generally accessible sources or in an otherwise lawful manner.

## 6.4 We protect Infineon from cyber threats

We uphold an adequate standard of cyber security behaviour and culture to ensure the confidentiality, integrity and availability, verifiability and traceability of data and information that needs to be protected.
We take up responsibility and actively support the corresponding processes according to our roles and live up to the standards laid out in corporate regulations on Cyber Security.

## 6.5 We comply with the regulations on data protection

Protection of personal data (of employees, customers and suppliers) is a high priority. We record, process, and use personal data only to the extent permitted by law, regulations and our internal guidelines and policies. Every one of us is obliged to comply with the statutory and company regulations on data protection to safeguard personal data entrusted to us. The Global Rule “Data Protection” contains more detailed regulations.

In cases of doubt, the responsible Data Protection Officers must be involved.

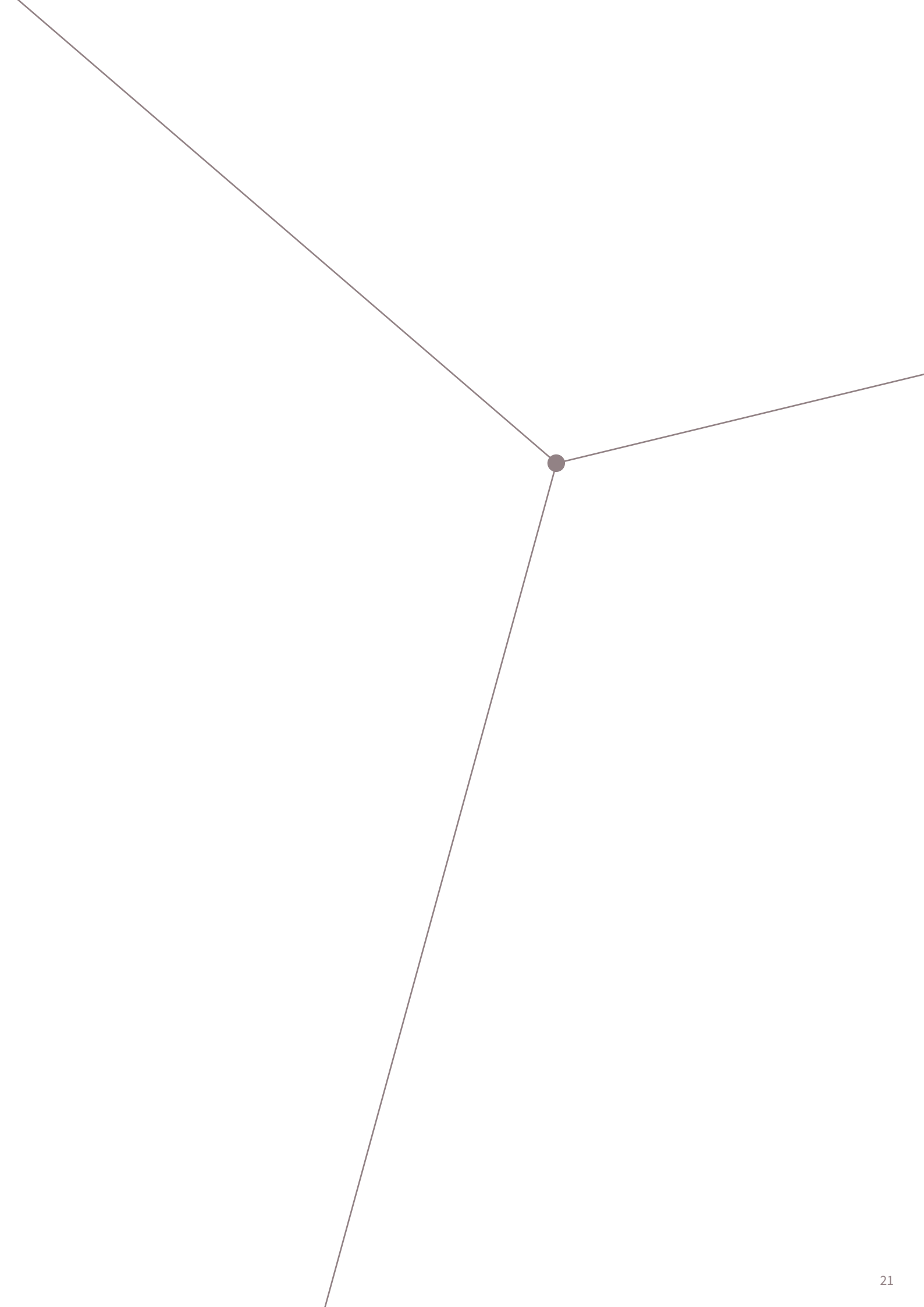
## 6.6 We promote transparency, openness and reliability in documentation

Trust in our global activities on the part of our investors is built on transparency, openness, and reliability. We therefore comply with the statutory requirements for proper accounting and financial reporting. Any records and reports produced for internal purposes or distributed externally must be truthful, complete, and understandable. Data and other records must always be complete, correct and up-to-date, and meet system requirements. The obligation to provide truthful details also applies in particular to accounts for travel and other expenses.

## 6.7 We do not exploit our insider knowledge

Infineon does not tolerate insider dealing. Anyone who comes into contact with insider information is obliged to handle it responsibly and in accordance with the Global Rule “Insider Law”. Insider information is specific information about circumstances not generally known to the public and which is likely to have significant influence on the price of listed securities.

It is prohibited by law to use insider information to acquire or sell securities or to recommend their sale or purchase. Violation of this prohibition may have serious consequences not only for the affected employees, but also for Infineon. Insider information must therefore be treated with confidentiality and must not be disclosed without justification – not even to other employees, family, or friends.





## At a glance

- Act in a sustainable and environmentally conscious manner
- Assume responsibility for our social environment
- Comply with the general conditions for social commitment

# 7. We are sincere in our social responsibility

## 7.1 We are committed to sustainability, quality and product safety

Infineon assumes its responsibility for the economic, environmental and social needs of current and future generations and is committed to acting in a sustainable manner. We therefore attach particular importance to constantly controlling and improving the quality of our products. We expect our employees to deal responsibly with potential risks and to report them to their manager.

## 7.2 We protect our environment

Preserving our natural resources is an integral part of our corporate strategy. We make life easier, safer, and greener – with technology that achieves more, consumes less, and is accessible to every one. The development of energy-efficient technologies and products is a core element of our efforts to help conserve resources. In our individual actions, too, we are obliged to consider the effects on the environment and avoid possible burdens on the environment or reduce them to an acceptable minimum.

We strictly adhere to laws and regulations to protect the environment and the climate and expect our suppliers to do the same.

## 7.3 We show social commitment

Infineon believes responsible corporate governance also includes social commitment (corporate citizenship). We therefore support selected non-profit institutions and initiatives in the following fields:

- Environmental protection and sustainability
- Disaster relief
- Technical and scientific education of future generations and
- Social needs at the Infineon sites

through monetary and non-monetary donations and sponsorship.

We do not make donations in the expectation of a service or a decision in our favor or as a quid pro quo for such a decision. Every donation and sponsorship is subject to a transparent approval process. More detailed regulations can be found in the Global Rule “Corporate Citizenship and Sponsoring”.

Infineon, in principle, makes no donations to political parties, politicians, or political organizations.

# 8. We ensure that the Business Conduct Guidelines are observed and enforced

## 8.1 We regularly take part in training on the BCG

In order to make these BCG known and provide a regular reminder, Infineon conducts regular compliance training courses for employees to inform them about the content of the BCG and the legal requirements to be observed. In addition, special compliance training sessions are held for employees of individual risk groups.
Every one is obliged to take part in the compliance training that is mandatory for their area of work.

## 8.2 We report misconduct proactively

We can only achieve the objectives of Infineon's BCG if everyone plays their part. Managers ensure that employees in their sphere of responsibility know and abide by the BCG.

If you become aware of a suspected violation of the BCG or statutory or internal regulations, we expect you to report the matter without hesitation. Only then can we jointly avert damage to our employees and the company.

There are various options to report a suspected compliance violations:

- 1. Notification to your manager
- 2. Report to the Corporate Compliance Officer or the responsible Regional Compliance Officer
- 3. Whistleblower portal "Integrity Line"

Options two and three are not only open to employees, but also to suppliers, customers, and any other third parties. Reports may be filed verbally or in writing, open or anonymously. Every report to Compliance will be documented, investigated, and treated confidential. Whistleblowers will receive feedback in due time.

No one who reports a suspected compliance violation in good faith needs to fear disadvantages, even if the suspected violation turns out to be unjustified. We do not tolerate any retaliation against whistleblowers and will protect them in a resolute manner. In the same way, we treat employees accused of misconduct fairly. We therefore urge you to report also your own mistakes as soon as possible.

We attach great importance to transparency. Identifying and responding to mistakes in good time helps ensure small problems do not become large ones. We therefore expect employees to cooperate without reservation in investigations or inquiries initiated by the company in connection with a suspected violation of the BCG or statutory or internal regulations.



## At a glance

- Take part in BCG training sessions
- Report suspected cases of misconduct proactively
- Prosecute culpable violations of rules rigorously, but always in a fitting manner
- Compliance contact details

## 8.3 We prosecute culpable violations in a fair and comprehensible manner

We take stringent action if misconduct is proven, with fair and comprehensible measures subject to company and statutory regulations. As part of this, we ensure our response is always fitting and determine for each case which consequences are suitable, necessary, and reasonable.

## 8.4 How to contact Compliance Department

If you want to report a Compliance related concern or if you seek for advice, you have the following options:

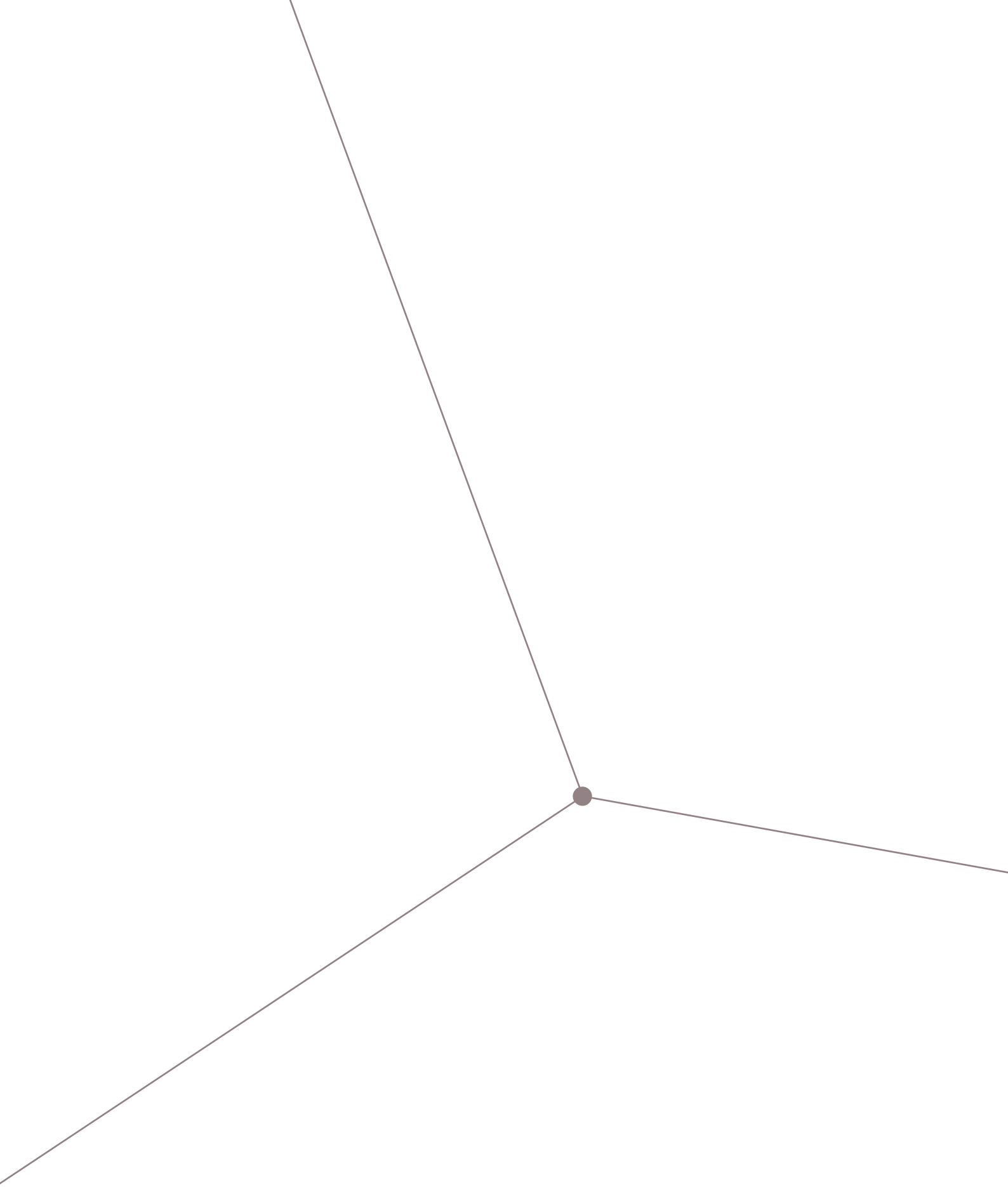
By E-mail: Compliance@infineon.com

By Phone: +49(0) 89 234 83199

By Mail: Infineon Technologies AG, IFAG CO,
Am Campeon 1-15, 85579 Neubiberg, Germany

Infineon Integrity Line

Find more information about the Infineon Compliance Program on the intranet or internet.



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| **Rules Owner (1st Appr.)** | Godzierz Cornelia (IFAG CO) | 2022-10-20 |
| **Approver** | Hanebeck Jochen (IFAG CEO) | 2022-10-21 |
| **Approver** | Schneider Sven (IFAG CFO) | 2022-10-21 |
| **Approver** | Hufenbecher Constanze (IFAG CDTO) | 2022-10-25 |
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