

17 January 2023

Public code of procedure for reporting violations and suspected violations of laws or guidelines

Ensuring compliance both with applicable laws and with internal guidelines has the highest priority at Infineon Technologies AG (hereinafter referred to as "Infineon") and is an integral part of responsible corporate management. Accordingly, all Infineon employees are called on to report violations of laws or guidelines. The objective of the reporting procedures is the prevention of violations of laws or guidelines by the earliest possible identification of existing risks, the resolution of potential violations as well as – when necessary – access to further appropriate remedy.

Infineon pursues a zero-tolerance policy regarding Compliance violations, in particular relating to the following categories:

- Human rights
- Corruption and bribery
- Misuse of company property
- Anti-competitive practices
- Information security and data protection
- Business operations (e.g. violations of environmental, health or safety regulations, violations of export controls, money laundering or other financial offenses)
- Conflicts of interest
- Other misbehavior (e.g. harassment or discrimination)

Infineon is aware of the fact that its corporate activities also impact third parties. Infineon's corporate management therefore always takes into account the interests of its own employees as well as the interests of third parties, including suppliers, entities entrusted by Infineon and other persons affected by the corporate activities of Infineon. The aforementioned are also called upon to report violations of laws or guidelines or suspected cases of such violations.

1 Reporting channels

Employees can report violations to their managers directly and at any time. In addition, several specific reporting channels are available to employees and third parties, in particular in case of human rights or environmental risks or violations within the own business area or in the supply chain.

1.1 Infineon Integrity Line

Infineon has established an online whistleblower portal, the [Infineon Integrity Line](#). The portal allows for written reports in eight different languages.

Authorization to view or process reports made to the whistleblower portal is exclusively limited to selected employees of the Infineon Compliance department.

1.2 Telephone hotline

Reports can also be made by telephone at any time by calling the following number:

+49(0) 89 234 83199

1.3 E-mail inbox

Reports can also be submitted by e-mail to the following address:

Compliance@infineon.com

1.4 Surface post

Reports can also be sent by conventional surface post to the following address:

Infineon Technologies AG
Attention: Michael Kuhn / Compliance Department
Am Campeon 1-15
85579 Neubiberg (Germany)

2 Basic principles for handling reports

2.1 Anonymity

It is generally not necessary to report any contact data or to disclose the identity of the whistleblower. Reports can be submitted on an anonymous basis to the extent permitted by law. Infineon will respect and ensure the anonymity of the whistleblower during the entire duration of the investigation of the report.

The Infineon Integrity Line incorporates specific technical precautions for guaranteeing the anonymity of the whistleblower. These precautions have been certified by an independent third party. A security notice informs whistleblowers using the whistleblower portal of the possibility of anonymous reporting and the guarantee of anonymity before submission of a report.

Anonymity can only be guaranteed if whistleblowers refrain from providing information which could make it possible to draw conclusions as to their identity.

Information provided in an anonymous report may become the basis for an internal investigation of the reported issue. The possibility that the identity of the whistleblower may become known during the course of the investigation because of the information provided in the report cannot be ruled out.

Infineon generally encourages whistleblowers to provide their contact data in order to make personal communication possible and in order to enable the best possible accommodation of the interests of the whistleblower and the special aspects of the case.

2.2 Confidentiality

The confidential treatment of the report and of the contact data of the whistleblower, to the extent provided, have the highest possible priority for Infineon. Accordingly, at Infineon reports are internally

treated according to the Need-to-Know principle. This guarantees that the smallest possible group of persons is involved in the processing of the report. Confidentiality is maintained unless:

- The whistleblower consents to the disclosure of his/her identity and/or of the report.
- Such disclosure is required for Infineon to comply with a legal obligation.
- Disclosure to public authorities is necessary or is made by Infineon in the context of cooperation with authorities.

2.3 Protection against discrimination or punishment

Infineon does not tolerate any form of discrimination against or punishment of whistleblowers. This basic principle is emphatically communicated within the company. Discrimination or punishment resulting from reports violate the values and standards of Infineon management.

Employees and/or managers proven to have discriminated against or punished individuals who report violations will be subject to disciplinary measures, the scope of which may include termination of the employment relationship.

At the same time, should whistleblowers be proven to have willfully and/or knowingly made reports intended to harm other persons, whistleblowers are also subject to disciplinary measures, the scope of which may include termination of the employment relationship. This also applies when intentionally and/or knowingly false reports are submitted. Whistleblowers should not conduct their own investigations intended to determine whether a suspected case constitutes a violation of a law or guideline. Infineon expects reports to be made in keeping with the whistleblower's best knowledge and good faith actions.

3 From reception of the report to conclusion

Every report submitted is taken seriously and is processed according to the steps outlined in the following.

3.1 Responsible instances

Reports are always processed by the Compliance department. Processing is conducted by the respective responsible [Compliance Officer](#). The Compliance Officer acts impartially and independently, is not bound by instructions and is obligated to maintain confidentiality. The Compliance Officer is advised by an equally impartial Compliance Panel. If necessary, the Compliance Panel is informed about the handling of the report, and in particular regarding a possible investigation.

The Human Rights Officer is involved whenever violations of the Infineon Human Rights Policy are reported and is the responsible in particular for follow-up measures, especially preventive measures and remedial actions, pursuant to the German Act on Corporate Due Diligence Obligations in Supply Chains ("*Lieferkettensorgfaltspflichtengesetz*" or LkSG).

3.2 Receipt of the report and receipt confirmation

Receipt of the report is confirmed to the whistleblower within a period of seven days after receipt of the report.

3.3 Plausibility check and further processing

In the first step, the report is checked for plausibility and categorized in order to ensure the proper further processing of the report. Every plausible report is investigated.

The objective is a fast and objective investigation in order to ensure an appropriate and neutral evaluation. In general, Infineon makes an effort to investigate all reports within six months.

3.4 Ongoing communication with whistleblowers

Once the report has been checked for plausibility, an attempt is made to establish and maintain contact with the whistleblower, to the extent that contact is possible. The objective is to resolve any open questions and to further explicate the issue in question together with the whistleblower.

3.5 Conclusion and remedial measures

After conclusion of the investigation, the responsible Compliance Officer or, in the case of violations of the Human Rights Policy, the Human Rights Officer, issues a recommendation on possible remedial actions and/or personnel measures. If necessary, personnel measures are implemented by the respective manager in coordination with the Human Resources department. Personnel measures are only implemented after consultation with the person affected by the investigated violation.

Execution of follow-up measures and remedial actions is always governed by the principle of proportionality. This means it is always decided on an individual case basis whether follow-up measures and remedial actions are suitable, necessary and reasonable. The agreed measures are then implemented and tracked.

To the extent possible, whistleblowers are informed in an appropriate manner of the conclusion of the investigation.

4 Effectiveness checks

The effectiveness of the whistleblower system is inspected and certified regularly and on an event-driven basis taking into account effectiveness criteria including those outlined in the United Nations Guiding Principles on Business and Human Rights.