



Infineon Human Rights Policy

December 2022

Scope

Sustainable and legally compliant conduct is a fundamental part of Infineon's guiding principles and is firmly anchored in our corporate strategy. Respect for human rights and the promotion of fair working conditions is an important matter to us and forms the basis of our corporate culture.

The Infineon Human Rights Policy supports our overall Corporate Social Responsibility (CSR) framework for the focus area of Human Rights and describes in detail how Infineon promotes Human Rights in its business activities and with our business partners worldwide. It applies to Infineon Technologies AG and all affiliated companies, as a whole referred to in the following as "Infineon".

Contents

1. Our commitment and expectation	4
2. Our human rights framework	5
3. Our priorities	6
4. Our implementation approach	9
5. Final provisions and contacts	10

1. Our commitment and expectation

Infineon Technologies is committed to meeting its responsibility to respect the human rights and dignity of individuals within our own business area, our supply chains and the communities in which we conduct business. We are guided by internationally recognized human rights principles and standards, including but not limited to:

- › The International Bill of Human Rights including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights as well as the International Covenant on Economic, Social and Cultural Rights
- › The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- › The UN Guiding Principles on Business and Human Rights

We strive to prevent, mitigate and where necessary remediate human rights risks and violations, and to enhance positive outcomes on individuals affected by our operations. We expect the same commitment from our business partners.

Our Human Rights Policy is complementary to our [Business Conduct Guidelines](#), [Corporate Social Responsibility \(CSR\) Policy](#) and [Supplier Code of Conduct](#). Our employees and business partners shall consider our Human Rights Policy in conjunction with and communicated through respective Infineon policies and guidelines in their day-to-day business activities.

2. Our human rights framework

Infineon has established a human rights framework in accordance with the international standards set out in the United Nations (UN) Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct and in alignment with the Responsible Business Alliance (RBA) Code of Conduct. Our human rights framework is designed to ensure compliance with applicable laws and regulations, to identify and mitigate human rights-related risks in operations and supply chains and to facilitate continuous improvement where needed.

The framework consists of the elements depicted below:



3. Our priorities

This section further specifies our priorities with regards to labor and human rights, occupational safety and health and environmental protection.

3.1 Prevention of underage labor

We do not tolerate any form of child labor and child labor is strictly prohibited. The minimum age for employment or work shall be 15 years, the minimum age for employment in the country in question, or the age for completing compulsory education in that country, whichever is higher. Exceptions apply for certain countries subject to ILO Convention 138 (minimum age reduced to 14 years) or for job training and training programs which are authorized by the respective government and which are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

3.2 Prevention of involuntary labor and human trafficking

We do not tolerate any form of slave labor, forced, bonded (including debt bondage), indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer or receipt of persons by means of threat, force, coercion, abduction, fraud or payment to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment. We do not tolerate any unreasonable restriction of the movement of workers or their access to basic liberties.

We ensure that workers are not required to pay unreasonable fees in connection with obtaining employment. This applies to, but is not limited to, fees and expenses associated with recruitment, processing or placement of both direct and contract workers.

We underline our complete rejection of any form of human trafficking or slavery with our [Infineon Slavery and Human Trafficking Statement](#), which was published in the context of the California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015.

3.3 Freedom of association

We respect the right of workers to associate freely with, form and join workers' organizations of their own choosing, to seek representation and to bargain collectively, as permitted by and in accordance with locally applicable laws and regulations. We do not discriminate with respect to employment based on union affiliation. In particular, we do not make employment subject to the condition that the worker relinquish union affiliation or agree not to join a union, or cause the dismissal of or otherwise prejudicial treatment of a worker for the reason of union affiliation or participation in union activities outside working hours (or within working hours, if such activities are consented to or if required by locally applicable laws or regulations). Our workers can exercise their rights to organize in a climate free of violence, pressure, fear and threats.

3.4 Diversity and non-discrimination

As an international organization, we thrive on the diversity of our employees. Our global diversity management provides the framework for a corporate culture which values the individuality of each employee and promotes equal opportunities – irrespective of age, disability, ethnic-cultural origin, gender, religion or belief, sexual identity or sexual orientation.

We are committed to a zero-tolerance policy on discrimination and harassment. Our employees and external business partners shall not be discriminated against, harassed or offended on the basis of ethnic-cultural origin, skin color, national or social origin, gender, religion or belief, age, disability, union or political affiliation, health status, sexual orientation, sexual identity, marital or family status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline and termination. Our employees (or potential employees) are not subjected to medical tests that could be used in a discriminatory way. Health tests, pregnancy or virginity testing or contraception are not used as conditions of employment.

3.5 Humane treatment

We do not tolerate any form of inhumane treatment. Any form of harassment, violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse, as well as withdrawal of basic physical comforts or isolation of families is prohibited.

3.6 Working hours

We comply with local legal working hours and rest day regulations. Additionally, all overtime is voluntary and paid in accordance with local and national laws and regulations. A regular workweek is restricted to 60 hours including overtime, and Infineon employees have at least one day off every seven days except in emergencies or exceptional situations.

3.7 Wages and benefits

We pay all workers at least the minimum wage required by locally applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, employees are compensated for overtime hours at the premium rate required by locally applicable laws and regulations. We do not use deductions from wages as a disciplinary measure. We offer vacation time, leave periods and holidays consistent with locally applicable laws and regulations. We pay workers in a timely manner and clearly convey the basis on which workers are being paid. We strive to offer our employees competitive, performance-based compensation adequate to their respective local economic areas.

3.8 Occupational safety and health, and environmental protection

The Infineon Integrated Management Program for Environment, Energy, Safety and Health (IMPRES) has been certified in accordance with ISO 45001, 14001 and according to ISO 50001 at major sites and details our priorities in the respective areas. We strive to create safe working conditions and a healthy work environment for all our employees.

3.9 Local communities

We benefit the communities in which we operate in various ways – by creating jobs, with our innovative products and solutions as well as through our social commitment as part of corporate citizenship activities. We understand the different needs of different countries and individuals and want to adapt our citizenship activities to those local necessities in order to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. Infineon has established an internal guideline for corporate citizenship and sponsoring to ensure that our donations make a meaningful contribution to the communities supported.

3.10 Supplier responsibility

Suppliers and their employees, personnel, agents and subcontractors must adhere to the Infineon Supplier Code of Conduct while conducting business with or on behalf of the company. Suppliers must require their subcontractors to acknowledge the Infineon Supplier Code of Conduct or its equivalent and to implement the principles and requirements therein in their operations and across their supply chains.

3.11 Responsible sourcing of minerals

Avoiding conflict minerals in the supply chain contributes to the prevention of human rights violations. As a member of the Responsible Minerals Initiative (RMI), we uphold our voluntary commitment to a conflict mineral-free supply chain. For this purpose, we have introduced a standardized process throughout the organization based on the OECD¹ Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our targets and our expectations are set forth in the [Infineon Conflict Minerals Policy](#) and the [Supplier Code of Conduct](#). We expand the scope of our voluntary commitment where deemed appropriate, e.g. towards cobalt and mica².

1 The Organisation for Economic Co-operation and Development (OECD)

2 A group of minerals known as layered silicates, which are frequently used as insulation in power diodes, semiconductors and rectifiers as well as other applications.

4. Our implementation approach

4.1 Ensuring accountability

Our Management Board oversees the implementation of the Infineon Human Rights Policy. On behalf of the Infineon Management Board, our Human Rights Officer coordinates human rights issues at Infineon and human rights due diligence supported by a cross-functional advisory group and in cooperation with internal stakeholders from corporate functions, business units and subsidiaries.

4.2 Assessing human rights risks and impacts

We fulfill our responsibility to individuals and the environment with appropriate and effective risk management measures.

We carry out risk analysis annually and when necessary on an ad-hoc basis in our own business areas as well as our supply chains. In addition, we conduct risk analysis based on substantiated knowledge of risks related to human rights or the environment (e.g. in case of incidents reported through our Integrity Line). We also rely on external data (e.g. country and industry risk indicators, media screening) and external service providers e.g. for standardized self-assessment questionnaires when mapping and assessing risk in our supply chains and our own operations.

All identified risks are minimized by preventive measures (e.g. development plans, training, contracts, etc.) that cover, to a reasonable extent and after prioritization, the entire company as well as our suppliers.

4.3 Grievance mechanism and whistleblower hotline

In case of suspicion of human rights violations, concerns can be raised by any stakeholder (e.g. employees of Infineon and of any other business partner or third party) to either the Human Rights Officer or Compliance through email or surface mail, or anonymously through our whistleblower hotline [Infineon Integrity Line](#). Inquiries and comments are treated confidentially, include a non-retaliation policy and are followed up by the team of our Human Rights Officer. If necessary, corrective actions are taken to solve problems at an early stage and to prevent more serious consequences for the individuals concerned.

By Email: Compliance@infineon.com

By Phone: +49(0) 89 234 83199

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

4.4 Remediation

Any indication of a possible human rights violation or confirmed violation of human rights in our supply chain or our own business area is investigated and addressed without undue delay. We define remediation together with the respective supplier or party and stakeholders to prevent, minimize and, if possible, end the violation.

4.5 Tracking performance and reporting

We review our risk management process once a year and on an ad hoc basis to confirm the effectiveness of this process, and if required, continue further development of the process.

Progress of implementation of the Infineon Human Rights Policy, including all identified risks, defined preventive measures and their effectiveness and the effectiveness of our risk management system, is reported annually to the Infineon Management Board.

Infineon publishes current information on the implementation of human rights in-house and at business partners and authorities in an annual report.

5. Final provisions and contacts

This policy may not form the basis for any individual claims or claims by third parties. The German version of this declaration has precedence; the present English-language text is not to be regarded as a legally binding document.

Please visit our [homepage](#) for more information on human rights. If you have any questions about the present Human Rights Policy or our Human Rights Framework please contact us anytime via Email (CSR@infineon.com).



www.infineon.com

Published by
Infineon Technologies AG
Am Campeon 1-15, 85579 Neubiberg
Germany

© 2022 Infineon Technologies AG
All rights reserved.

Date: 12/2022