



# Infineon Human Rights Policy

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# Scope and purpose

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

The purpose of this Human Rights Policy Statement is to summarize Infineon's human rights strategy, explain the implementation of our human rights and environmental due diligence, describe how we promote human rights in our business activities and with business partners worldwide, and outline our expectations for employees and business partners.

This Human Rights Policy supports our overall Corporate Social Responsibility (CSR) framework for the focus areas of human rights and environment and applies to Infineon Technologies AG and all affiliated companies, collectively referred to in the following as "Infineon".

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# 1. Our commitment and expectations

Infineon respects the human rights and dignity of individuals within our own business area, our supply chains and the communities in which we conduct business. We align our entrepreneurial activities with internationally recognized principles and standards, including but not limited to the following:

- The International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Ten Principles of the UN Global Compact
- The UN Sustainable Development Goals (SDGs)
- The Code of Conduct of the Responsible Business Alliance (RBA)
- The Organization for Economic Cooperation and Development (OECD) - Guidelines for Multinational Enterprises
- The OECD Due Diligence Guidance for Responsible Business Conduct

In alignment with the UNGP framework, we follow the higher standard where national law and international standards differ. We comply with national laws while seeking to respect the principles of internationally recognized human rights.

We strive to prevent, mitigate, and, where necessary, remediate human rights and environment related risks and violations and enhance positive outcomes for individuals affected by our operations. We expect our business partners to also commit to respecting human rights, establishing appropriate due diligence processes, and passing on these expectations to their own 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 the 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 to ensure compliance with applicable laws (e.g. German Supply Chain Due Diligence Act) and regulations, to implement due diligence obligations in own business area and supply chains and to facilitate continuous improvement where needed.

The framework consists of the elements depicted below:



# 3. Our fields of action

This section further specifies our fields of action with regard to human rights 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 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 to certain countries subject to ILO Convention 138 (reduces minimum age to 14 years), job training and training programs authorized by the respective government and consistent with Article 6 of ILO Convention No. 138, and light work consistent with Article 7 of ILO Convention No. 138. Workers under the age of 18 are not permitted to work night shifts or overtime. We ensure the proper management of student workers and protect student rights in accordance with the applicable laws and regulations. We also provide support and training to all student workers.

## 3.2 Prevention of involuntary labor and human trafficking

We do not tolerate any form of slave labor, or 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, or 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 free 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, but is not limited to, fees and expenses associated with the recruitment, processing, placement and transportation of both direct and contract workers. We do not tolerate any form of misleading or fraudulent practices in recruiting employees or in offers of employment. Such practices include failing to disclose basic information in a format and language accessible to the worker or making material misrepresentations when recruiting workers with respect to the key terms and conditions of employment. This includes material misrepresentations regarding wages and fringe benefits, work location, living conditions, housing and associated costs, any significant cost to be charged to the worker, and, if applicable, the hazardous nature of the work.

We emphasize our total rejection of any form of human trafficking and slavery through our [Infineon Slavery and Human Trafficking Statement](#), issued in response to the California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015.

### 3.3 Freedom of association and collective bargaining

We respect the right of workers to associate freely with, form, and join workers' organizations of their own choosing to seek representation and collectively bargain 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. We do not cause the dismissal or otherwise prejudicial treatment of a worker due to union affiliation or participation in union activities outside of working hours or during working hours if such activities are consented to or when 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. Where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternative legal forms of worker representation.

### 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 that values the individuality of each employee and promotes equal opportunities, irrespective of age, disability, ethnic/cultural origin, gender, religion or belief, gender 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 based on ethnic/cultural origin, skin color, national or social origin, gender, religion or belief, age, disability, union or political affiliation, health status, sexual orientation, gender identity, marital or family status with respect to hiring and employment practices, including employment applications, promotions, rewards, training access, 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 manner. Health tests, pregnancy tests, virginity tests, and contraception are not required as conditions of employment.

### 3.5 Humane treatment

We do not tolerate any form of inhumane treatment and prohibit all forms of violence and harassment, including sexual harassment, sexual abuse, corporal punishment, mental and physical coercion, bullying, public shaming, verbal abuse, deprivation 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 work hours, 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 days, 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 that is adequate for 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) is certified in accordance with ISO 45001 and 14001 and, at major sites, in accordance with ISO 50001 and details our priorities in the respective areas. IMPRES considers the Minamata, Basel and Stockholm convention requirements, among others. We strive to create safe working conditions and a healthy work environment for all our employees.

### 3.9 Local communities

We benefit the communities where we operate in a variety of ways – through job creation, innovative products and solutions, and our social commitment as part of our corporate citizenship activities. We understand the unique needs of different countries and individuals and strive to tailor our citizenship activities to those local needs to promote sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all. Infineon has established an internal Corporate Citizenship and Sponsoring Rule to ensure our donations make a meaningful contribution to the communities we support.

### 3.10 Supplier responsibility

Suppliers and their employees, personnel, agents, and subcontractors are required to adhere to the Infineon Supplier Code of Conduct when conducting business with or on behalf of the company. Suppliers, in turn, must require their subcontractors to acknowledge the Infineon Supplier Code of Conduct or its equivalent and to implement its principles and requirements 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 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 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our targets and expectations are outlined in the [Infineon Conflict Minerals Policy](#) and the Supplier Code of Conduct. We extend the scope of our voluntary commitment where appropriate, for example, to include minerals such as cobalt and mica<sup>1</sup>.

### 3.12 Land grabbing

We do not tolerate unlawful evictions and prohibit the unlawful taking of land, forests, and waters in the acquisition, development, or other use of land, forests and waters, the use of which secures the livelihood of a person.

### 3.13 Use of security services

We do not tolerate the use of private or public security forces that result in torture, inhuman or degrading treatment, or bodily harm or limit freedom of association. All our security practices are gender appropriate and nonintrusive. We do not tolerate unreasonable restrictions on movement within the workplace or on entering or leaving company-provided facilities.

<sup>1</sup> A group of minerals known as layered silicates, which are frequently used as insulation in power diodes, semiconductors, and rectifiers, as well as in other applications.

# 4. Our implementation approach

Based on our human rights framework, we have established appropriate and effective risk management to meet our due diligence obligations.

## 4.1 Ensuring accountability

The Infineon Management Board bears the overall responsibility for compliance with human rights and environmental due diligence obligations and the implementation of the Human Rights Policy. On behalf of the Management Board, the Human Rights Officer is responsible for coordinating all human rights issues at Infineon, monitoring risk management to ensure it complies with due diligence obligations and informing the Management Board on a regular basis.

The Human Rights Officer is supported by a cross-functional advisory group and cooperates with internal stakeholders from corporate functions, business units, and subsidiaries. The CSR Board, which consists of two Management Board members, the Human Rights Officer, and departmental representatives, discusses current CSR issues to derive measures for the company at an early stage.

## 4.2 Risk analysis and prevention

We conduct a risk analysis of our own business area and our supply chain each year and carry out risk analyses on an ad hoc basis when necessary. Our risk analysis is based on a two-stage approach consisting of an abstract and a concrete risk assessment. We identify, assess, prioritize, and document actual and potential risks using external information sources (e.g., country- and sector-specific risk indicators) and third-party tools. Ad hoc risk analyses are triggered by substantiated knowledge of risks or violations (e.g., incidents reported via our whistleblower hotline) and in the event of a significant change in Infineon's risk situation.

In our most recently concluded risk analysis, we identified and prioritized the following risks based on appropriateness criteria:

- Disregard for occupational health and safety and work-related health hazards (own business area / direct suppliers)
- Disregard for the prohibition of forced labor and all forms of slavery (direct suppliers)

Prioritized risks are subject to the appropriate preventive measures implemented in the relevant business areas, which include the delivery of training, risk-based controls, and others, such as the implementation of contracts and guidelines. We review our measures for appropriateness and effectiveness to prevent and minimize prioritized risks.

## 4.3 Grievance mechanism and whistleblower hotline

In the case of a suspected human rights violation, any stakeholder (e.g., employees of Infineon and other business partners or third parties) can report concerns to either the Human Rights Officer or the Compliance department by email or surface mail or through our whistleblower hotline [Infineon Integrity Line](#). Inquiries and reports are treated confidentially, include a non-retaliation policy, and are followed up by the Compliance team. The Human Rights Officer is involved whenever violations of the Infineon Human Rights Policy are reported. If necessary, corrective action is taken to resolve problems at an early stage and to prevent more serious consequences for the individuals concerned. Our [complaints procedure](#) defines the various reporting channels as well as the principles and processing.

Via email: [Compliance@infineon.com](mailto: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 or confirmed human rights or environmental violation in our supply chain or in our own business area is investigated and addressed without undue delay. We work together with the respective supplier, party or stakeholder to determine remedial actions to prevent, minimize, and, if possible, stop the violation.

## 4.5 Tracking performance and reporting

We review our risk management process once annually and on an ad hoc basis to affirm its effectiveness and develop it further when required. We monitor the effectiveness of our risk management using key performance indicators we have developed and review regularly. The Human Rights Officer reports annually to the Infineon Management Board on the progress made in implementing the Human Rights Policy, the results of the annual risk analysis, the defined preventive measures and their effectiveness, and the effectiveness of our risk management system.

Infineon publishes information annually in the Infineon [Sustainability Report](#) on the implementation of human rights within the company and at business partners and reports to authorities (e.g., the German Federal Office of Economics and Export Control) on the implementation of human rights and environmental due diligence obligations.

# 5. Final provisions and contact information

This Infineon Human Rights Policy may not serve as a basis for any individual claims or claims by third parties. The English version of this Policy Statement is a translation; in case of doubt the German version shall be authoritative.

For more information on human rights, please visit our [homepage](#). If you have any questions about our Human Rights Policy or human rights framework, please contact us anytime via email ([CSR@infineon.com](mailto:CSR@infineon.com)).



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