



Infineon Technologies responsible global supply chain management



- Conflict Minerals Policy -

Corporate responsibility and respect of human rights are essential for Infineon Technologies AG and its subsidiaries (collectively referred to as **"Infineon"**), in all our operations and our global supply chain. Thus, Infineon is committed to the target that its use and sale of **"Conflict Minerals"** do not contribute to the ongoing conflict in the Democratic Republic of Congo (**"DRC"**).

"Conflict Minerals" as defined by Securities and Exchange Commission (SEC) rules means cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, currently limited to **tantalum, tin, tungsten and gold**¹. Parts of these Conflict Minerals are mined and sold by armed groups to finance the conflict in the eastern DRC which is characterized by an extreme level of violence.

On 21 July 2010, the United States of America enacted legislation that requires companies which are publicly listed in the US to provide disclosures of the use of Conflict Minerals originating from any **"Covered Country"** (Sec. 1502 Dodd-Frank Wall Street Reform and Consumer Protection Act). Covered Countries shall mean DRC or an adjoining country (presently Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia). On 22 August 2012, the US Securities and Exchange Commission issued a final rule to implement the disclosure requirements (**"SEC Final Rule"**). Even if Infineon is not publicly listed in the US, the SEC Final Rule indirectly affects it and its suppliers. In order to satisfy their obligations under the SEC Final Rule, US public companies must obtain assurances from their suppliers, such as Infineon, and those suppliers, in turn, must obtain assurances from other entities further down the supply chain.

Infineon is taking systematic steps to avoid the use of Conflict Minerals in its supply chain that directly or indirectly finance or benefit armed groups in the DRC and thereby is achieving and maintaining a supply chain

¹ Unless the United States Secretary of State determines any other derivatives or any other minerals and their respective derivatives to be financing the conflict in the Covered Countries.



that is “**DRC Conflict Free**”². These systematic steps will be based on the five-step framework for risk-based due diligence on the source and chain of custody of Conflict Minerals in our supply chain according to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“**OECD Guidance**”).

Infineon expects its suppliers to have in place due diligence measures in accordance with OECD Guidance or any other nationally or internationally recognized supply chain due diligence standard of equivalent nature ensuring that direct materials, parts, components, sub-assemblies supplied to us are DRC Conflict Free. Based on the foregoing, Infineon expects that suppliers can reasonably demonstrate that they have exercised due diligence on the source and chain of custody of Conflict Minerals and verify on an ongoing basis – e.g., by participation in established supply chain communication processes such as the “EICC®/GeSI Conflict-Free Smelter Program” or otherwise – that their products are “DRC Conflict Free”. Infineon requires that suppliers whose products contain tantalum, tin, gold and tungsten submit this information to Infineon using the standardized **EICC/GeSI Conflict Minerals Reporting Template** that traces the metals back through the supply chain.

Infineon also supports industry initiatives such as the **Conflict-Free Smelter Program (CFSP)** to validate responsible and sustainable sources.

Our objective is to have and maintain a conflict-free supply chain. If Infineon becomes aware of a supplier whose supply chain includes Conflict Minerals which are not “DRC Conflict Free”, we will take the appropriate actions to remedy the situation in a timely manner, which includes reassessment of supplier relationships, to achieve that objective.

² DRC conflict free “means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups” as defined SEC Rule 13p-1 under the Securities Exchange Act of 1934.