



Supplier Code of Conduct

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Introduction

At Infineon Technologies, sustainability unites social, ecological, and economic responsibility. Our objective is to maintain mutually beneficial relationships with our suppliers and to reward and do business with suppliers who demonstrate their responsibility in the same manner.

As a globally operating company, we take our role in the multinational community seriously: We are committed to fundamental principles of social and environmental responsibility that are consistent with applicable laws and international standards, including but not limited to: the 10 Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the Paris Agreement, the Code of Conduct of the Responsible Business Alliance, the German Supply Chain Due Diligence Act and to the principles we have defined for ourselves in our own Business Conduct Guidelines and our Human Rights Policy.

These standards build the framework of our Supplier Code of Conduct.

Subject and Scope

The Supplier Code of Conduct reflects the essential business behavior requirements that we expect our suppliers to uphold. Each of our suppliers and its affiliates shall warrant ...

- › compliance with all applicable environmental and human rights laws and regulations¹ as listed in the Annex of this document,
- › compliance with the requirements described in chapters A-H of the present document,
- › that all requirements and standards described herein are addressed and passed on along their supply chains by obliging their suppliers and subcontractors to comply with the Supplier Code of Conduct² and providing a copy of it no later than upon conclusion of the respective contract or subcontract.

Please note that our suppliers shall comply with the currently applicable version of the Supplier Code of Conduct of Infineon Technologies available on our [website](#).

¹ A reference list of international conventions on environment and human rights is provided at the end of this document.

² Suppliers shall be authorized to comply with this obligation based on the supplier's own code of conduct, provided that the protected rights set out there in correspond to those of this Supplier Code of Conduct.

A. Labor and Human Rights

We respect and observe internationally proclaimed human rights as defined in the International Declaration of Human Rights and Fundamental ILO Conventions. We ensure that we are not complicit in human rights abuses, whether directly or by way of beneficial or silent complicity. Our suppliers shall comply with these principles as well. More information about our company's commitments to human rights is available through Infineon's [Human Rights Policy](#).

Diversity and non-discrimination – Our suppliers shall treat their employees with respect and dignity as well as ensure that their actions or communications do not harm a person's honor or reputation. Our suppliers shall promote a culture which values the individuality of each staff member and promotes equal opportunities – irrespective of age, disability, ethnic-cultural origin, gender, religion or belief, or sexual identity.

Our suppliers must not tolerate any discrimination, harassment or offense on the basis of for example race, color, national, ethnic or social origin, gender, gender identity, health status, religion or belief, age, migrant status, disability, political or labor union affiliation, veteran status, sexual orientation, marital or family status. All forms of sexual harassment, corporal punishment, physical coercion, and verbal abuse shall be prohibited, as well as any intimidating, hostile or offensive conduct that interferes with an employee's work performance.

Forced labor and modern slavery – We are against any form of forced labor and slavery; this includes any work that is required of a person under threat of punishment and for which the person has not made himself/herself available voluntarily. Hence, suppliers must reject forced labor, including indentured labor, bonded labor, and any other form of forced labor according to the Convention Concerning Forced or Compulsory Labour (International Labour Organization's Convention 29 and Convention 105).

Suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, sexual exploitation, humiliation or fraud. All work shall be voluntary, workers shall be free to leave work, terminate their employment or other work status with reasonable notice and must not be required to pay recruitment expenses, either in their home country or the country where work is performed. Suppliers must not engage in practices that restrict workers' access to adequate housing (if provided by the company), food, clothing, water and sanitation facilities where applicable.

Child/underage labor – We are against all forms of underage labor. Suppliers shall comply with the Convention on the Minimum Age for Admission to Employment (International Labour Organization's Convention 138) and shall be committed to prohibition and immediate action to eliminate the worst forms of child labor according to the Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (International Labour Organization's Convention 182).

Hence, our suppliers must not permit work to be carried out by persons ...

- › under the age of 15,
- › under the applicable minimum legal age for employment,
- › under the applicable minimum legal age for completion of compulsory education, whichever is highest.

Exceptions apply to employment relationships in developing countries operating under International Labour Organization (ILO) Convention 138 and to governmental authorized job training and apprenticeship programs that clearly benefit the persons participating.

Furthermore, workers under the age of 18 ("young workers") must not perform hazardous work that is likely to jeopardize their health or safety or that compromises their education (e.g. night shifts, overtime). Suppliers shall have a remediation plan in place, in the event of any underage labor found.

Working hours – Our suppliers shall meet local legal working hour and rest day requirements. Suppliers shall keep employees working hours and pay records in accordance with local and national laws and legal regulations. In line with

the Code of Conduct of the Responsible Business Alliance (RBA), a work week shall be restricted to 60 hours, including overtime, which always must be voluntary, and workers shall have at least one day off every seven days except in emergencies or exceptional situations.

Wages and benefits – Our suppliers shall pay all workers fair compensation which at least meets 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, supplier employees shall be compensated for voluntary overtime hours at the premium legal rate. Our suppliers shall not use unduly deductions from wages as a disciplinary measure. Our suppliers shall offer vacation days, leave periods, and holidays consistent with locally applicable laws and regulations. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Occupational safety and health – We are committed to protecting our employees' health and safety. Consequently, our suppliers shall comply with Occupational Safety and Health Conventions (International Labour Organization's Convention 155 and 187) and provide a safe and healthy working environment for all their employees, shall monitor workers' potential exposure to safety hazards, and shall minimize risks and hazards at all of the suppliers' workplaces in order to protect the health and well-being of their employees, contractors and third parties visiting the suppliers' premises. Suppliers shall implement an occupational health and safety training management system determining when and how to use equipment correctly as well as educational materials about risks associated with these hazards. Furthermore, we encourage our suppliers to implement an occupational health and safety system, certified according to ISO 45001 or its equivalent.

Freedom of association and collective bargaining – Our suppliers shall respect workers' rights to freedom of association and collective bargaining in accordance with local legal requirements. Suppliers shall comply with the Conventions on Freedom of Association and Protection of the Right to Organize Convention (International Labour Organization's Convention 87) and the Right to Organize and Collective Bargaining (International Labour Organization's Convention 98). Workers' rights to associate with others, form and join (or refrain from joining) must not be a subject to harassment, discrimination or retaliation. Trade unions are free to operate in accordance with the applicable laws of the place of employment, including the right to strike and the right to collective bargaining.

Third-party recruitment agencies – Our suppliers shall ensure that the third-party recruitment agencies it uses comply with the standards and practices covered by the Infineon Technologies Supplier Code of Conduct and that they act ethically and in the best interests of workers when contracting labor. Recruitment agencies and suppliers must not withhold migrant workers' original government issued identification and travel documents.

Migrant workers – Our suppliers shall ensure that both domestic and foreign migrant workers face no risk of exploitation and to ensure that migrant workers are not discriminated against with respect to these standards. Migrant workers shall have access to free, comprehensive and accurate information regarding their rights and the conditions of their recruitment and employment. Our suppliers shall only engage workers who have a legal right to work, unless the workers are associated with an approved program for refugee populations.

Land grabbing – Our suppliers shall not take part in unlawful evictions or unlawful taking of land, forests or waters that support and secure a person's livelihood.

Use of security services – Our suppliers shall ensure the responsible provision of security services by hiring and use of private or public security services that respect the human rights of all persons by not:

- › threatening torture or cruel, inhuman or degrading treatment,
- › threatening life or serious injuries,
- › violating the freedom of association or the right to organize.

B. Environmental Protection

Our suppliers shall assume global and local environmental responsibilities and shall take the necessary steps to protect the environment in the various regions of the world in which they operate. Our suppliers shall comply with all applicable environmental laws and regulations, including but not limited to those that regulate hazardous materials, waste, air, water and soil emissions and discharges. This equally applies to own operations onsite as well as to logistics and shipping activities. We encourage our suppliers to implement an environmental management system certified according to EN ISO 14001 or its equivalent. Our suppliers shall train their staff regularly in environmental protection issues.

Circular economy and resource efficiency – Our suppliers play a crucial role in supporting our commitment to a circular economy and resource efficiency. Suppliers shall adopt a proactive approach to minimizing the environmental impact of their services, products, materials, tools, and equipment. This includes reducing water withdrawal and consumption, implement water reuse and recycling mechanisms complemented by responsible wastewater treatment practices. Suppliers shall also strive to promote closed-loop systems by using sustainable, renewable natural resources and implementing a systematic approach to identify, manage, reduce, reuse, recycle, and finally responsibly dispose of waste.

Furthermore, we encourage our suppliers to take a proactive approach to sustainability by incorporating environmentally responsible materials and practices into their products and services. Upon request, the supplier shall collaborate with Infineon to increase transparency regarding secondary material quotas in their products shipped to Infineon.

Climate neutrality – Our suppliers shall strive to reduce their own carbon footprint, examine, track, and document all relevant greenhouse gas emissions and strive for energy efficiency. We encourage our suppliers to incorporate renewable energy sources into their operations, aiming to minimize their reliance on fossil fuels and prioritize sustainable energy practices. We encourage our suppliers to define a science-based carbon reduction target (“SBT”) which is in line with the criteria of the Science Based Targets initiative (“SBTi”).

We encourage our suppliers to contribute to the carbon footprint transparency of their products and services delivered to Infineon Technologies. Upon our request, suppliers shall provide data on emissions at the company and/or product level.

Biodiversity protection – Our suppliers shall take steps to preserve and protect natural ecosystems by implementing practices that minimize and when possible, avoid adverse impacts on biological diversity, including responsible land use, avoiding deforestation and damage to wetlands, the marine environment and other natural habitats. This applies especially to properties delineated as natural heritage.

Hazardous materials and waste - Our suppliers shall identify and minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Upon our request, suppliers shall provide data on the use of restricted substances in processes and finished products. Suppliers shall actively investigate suitable substitutes to maintain product and environmental stewardship.

Our suppliers shall comply with provisions set forth for the following hazardous chemicals and waste:

- › manufacturing mercury-added products and on using mercury and mercury compounds in manufacturing processes, as well as the ban on the processing of mercury waste, in accordance with the Minamata Convention,
- › production and use of chemicals in compliance with the Stockholm Convention on Persistent Organic Pollutants (POPs Convention),
- › handling, collection, storage or disposal of waste in a manner that is not environmentally sound in accordance with the provisions of applicable laws (POPs Convention),
- › export and import of hazardous or other waste, in accordance with the Basel Convention,

- › production, consumption, import and export of controlled substances in accordance with the Montreal Protocol on ozone-depleting substances,
- › import or export of chemicals listed in Annex III to the Rotterdam Convention on the Prior Informed Consent Procedure for certain hazardous chemicals and pesticides in international trade (Rotterdam Convention).

C. Supply Chain Responsibility

Supply chain due diligence – Our suppliers shall conduct due diligence on their direct suppliers and subcontractors and select business partners that comply with the practices of responsible business conduct as described in this code. Suppliers shall make the best efforts to cascade these requirements along their supply chain.

Responsible sourcing of raw materials and minerals – Suppliers shall responsibly source raw materials and minerals used in their products by developing a management system appropriate to the size and circumstance of their operations. Suppliers shall strive to map their supply chain from raw materials to the finished goods sold to Infineon. Our suppliers shall require that its (sub-)suppliers relevant for the production of goods sold to Infineon also proactively map their supply chains.

Upon request, when we determine that such information is deemed necessary to comply with legal obligations, our suppliers shall agree to make every reasonable effort to provide Infineon with supply chain mapping data and documented chain of custody information (e.g., part numbers, manufacturing locations, shipping records).

We are committed that Infineon products must not contain “conflict minerals³” tin, tungsten, tantalum and gold (3TG), cobalt and Mica (layered silicates) that directly or indirectly finance or benefit armed groups or conflicts such as the ongoing conflict in the Democratic Republic of Congo (DRC) and adjoining countries, as described in our [Conflict Minerals Policy](#).

Suppliers whose products contain conflict minerals shall implement due diligence measures in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas, or any other supply chain due diligence standard of equivalent nature. These suppliers shall submit conflict minerals, cobalt and Mica related information to Infineon Technologies using the standardized Conflict Mineral Reporting Template (CMRT), and the Extended Minerals Reporting Template (EMRT) issued by the Responsible Minerals Initiative (RMI). Our suppliers shall urge smelters and refiners identified in their supply chain to complete an independent third-party conflict-minerals audit process and shall remove from their supply chain those which have not passed or are unwilling to participate in such an audit.

³DRC 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 by SEC Rule 13p.1 under the Securities and Exchange Act of 1934.

D. Business Ethics

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. Whatever we do, integrity is our guiding principle.

To live up to this promise and to uphold our reputation we are...

- › abiding by the rules of fair competition and anti-trust laws,
- › working against corruption in all its forms,
- › committed to cyber security,
- › not taking advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practices,
- › respecting contractual obligations,
- › avoiding any business behavior which might be considered inappropriate,
- › protecting all confidential information,
- › respecting other parties' intellectual property,
- › complying with anti-money-laundering and export control regulations.

Our suppliers shall act with integrity as well and to comply with these principles.

Business gifts & entertainment – Infineon employees are not allowed to accept any gifts or entertainment invitations other than of nominal value. This includes the acceptance of any benefits that might give rise to the appearance of improper influence. Our suppliers shall comply with this business practice.

Conflicts of interest – The highest standards of integrity are to be upheld in business interactions with Infineon Technologies. The employees of our suppliers shall refrain from offers that could give rise to the appearance of a conflict of interest for our employees. Our suppliers shall proactively inform Infineon Technologies in case of a potential conflict of interest, e.g. due to family connections.

Contractual basis – Our suppliers shall only provide Infineon Technologies with products or services based on an executed purchase order, supply contract or service contract.

Business contact – Infineon Technologies' procurement department shall be the sole point of business contact for the supplier's sales department. Commercial terms and conditions (including but not limited to price, payment terms, delivery date, specification) shall only be discussed with the participation or consent of Infineon Technologies' procurement department.

E. Business Resilience

Our suppliers shall establish a robust and resilient supply chain and adequate processes to ensure uninterrupted product delivery and provision of services. Suppliers shall implement and administer appropriate plans or measures to ensure business resilience.

F. Management System Processes

Our suppliers shall adopt or establish documented and adequate management system processes designed to ensure compliance with the present Supplier Code of Conduct and with all applicable laws, regulations, and standards to identify and mitigate related risks and to facilitate continuous improvement. Infineon Technologies expects a collaborative approach from our suppliers by providing support in investigating potential violations and mitigating detected violations. Our suppliers shall provide us with relevant information upon request.

Grievance Mechanisms – All employees, business partners, customers or other stakeholders who would like to report possible violations of national regulations or internal guidelines can make their report to the Infineon Integrity Line, openly or anonymously. All reports will be treated confidentially and are covered by a non-retaliation policy. Our suppliers shall also ensure that their employees are able to communicate and share openly grievances with management regarding working conditions and management practices without any fear of reprisal, intimidation or harassment. The grievance procedures provided shall be accessible and shall include the option to report anonymously where appropriate. Suppliers shall periodically provide workers with information and training on all grievance procedures.

Trainings – Our suppliers shall conduct regular training measures to ensure compliance with applicable laws and regulations, human rights, and the standards laid out in the currently applicable version of our Supplier Code of Conduct. Suppliers shall provide such training to all relevant personnel, including personnel of its affiliated companies. Suppliers shall make the documentation of such training available to Infineon Technologies upon request. If a supplier does not provide such training and/or is unable to provide appropriate training, the supplier shall align with Infineon Technologies to ensure the implementation of such training.

G. Verification of Compliance

Our suppliers shall accept that we regularly assess whether or not our suppliers comply with the present Supplier Code of Conduct in its currently applicable version as well as our respective human rights and environment-related expectations in order to fulfil our obligations under global or national supply chain due diligence laws and regulations. Our suppliers shall cooperate with Infineon Technologies in this regard.

Audits – Infineon Technologies, its subsidiaries, their customers and/or any third party authorized by Infineon Technologies or its subsidiary shall be entitled to conduct risk-based audits at our suppliers' premises and production sites and in accordance with applicable laws and regulations. On our request, suppliers shall also make their best effort to facilitate the performance of audits at premises of their contractors and subcontractors.

Information rights– Suppliers shall cooperate and provide Infineon Technologies with relevant information and documents in accordance with applicable laws and regulations for the fulfilment of our obligations under applicable supply chain due diligence laws. Suppliers shall in particular make information available about a significantly changed risk situation in their company or supply chain.

Accurate records – Our suppliers shall maintain complete and truthful financial and non-financial records, accurately reflecting all business transactions and operations without any falsification or misrepresentation, ensuring compliance with applicable accounting standards and laws.

H. Non-compliance with Supplier Code of Conduct

Supplier shall inform Infineon Technologies in writing without undue delay about any non-compliance with the requirements herein. This applies for non-compliances concerning the supplier's own operations as well as the supplier's own supply chain. In such cases, our suppliers shall immediately perform corrective actions required to ensure compliance. The corrective actions planned by suppliers and, upon Infineon Technologies' request, the status of their performance, shall be communicated by suppliers to Infineon Technologies in writing. If necessary, we will assist and cooperate with our suppliers with regard to the implementation of such corrective actions.

If suppliers do not cooperate to the extent required or do not (fully) implement appropriate corrective actions within a reasonable deadline set by us, we will be entitled to suspend performance of the business relationship, including cancellation of any outstanding Purchase Orders, or termination of the business relationship in serious cases. In cases of serious, persistent or repeated breaches, a deadline for the termination needs not to be set.

This section shall also apply in case of any reasonable suspicion of non-compliance with the requirements herein, provided that it is not acceptable for Infineon Technologies to continue performance of the business relationship and/or any outstanding Purchase Order.

Annex

List of reference documents

- [1] [Infineon Business Conduct Guidelines](#)
- [2] [Infineon Human Rights Policy](#)
- [3] [Infineon Conflict Minerals Policy](#)
- [4] [Infineon Modern Slavery and Human Trafficking Statement](#)
- [5] [Infineon Whistleblower Hotline](#)
- [6] [Code of Conduct of the Responsible Business Alliance](#)
- [7] [German Supply Chain Due Diligence Act](#)
- [8] [OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas](#)
- [9] [Uyghur Forced Labor Prevention Act](#)
- [10] [Ten Principles of the United Nations Global Compact](#)
- [11] [The Paris Agreement](#)
- [12] [United Nations Guiding Principles on Business and Human Rights](#)

List of international conventions on environment and human rights

- [13] [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal](#)
- [14] [Fundamental ILO Conventions](#)
- [15] [International Bill of Human Rights](#)
- [16] [Convention concerning the Protection of the World Cultural and Natural Heritage](#)
- [17] [Convention for the Prevention of Pollution from Ships](#)
- [18] [Convention of the Rights of the Child](#)
- [19] [Convention on Civil and Political Rights](#)
- [20] [Covenant on Economic, Social and Cultural Rights](#)
- [21] [Minamata Convention on Mercury](#)
- [22] [Montreal Protocol on Substances that Deplete the Ozone Layer](#)
- [23] [Ramsar Convention on Wetlands](#)
- [24] [Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade](#)
- [25] [Stockholm Convention on Persistent Organic Pollutants](#)
- [26] [United Nations Convention on Biological Diversity](#)
- [27] [United Nations Convention on the Law of the Sea](#)

In case of any questions about our Supplier Code of Conduct,
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