

**Corporate Human Rights Benchmark  
2019 Company Scoresheet**

**Company Name** Infineon Technologies AG  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score (\*)** 13.0 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
1.6	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
0.8	20	D. Performance: Company Human Rights Practices
2.6	20	E. Performance: Responses to Serious Allegations
2.9	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policies (10% of Total)**

**A.1 Policy Commitments (5% of Total)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company explicitly commits to respecting human rights in its Business Conduct Guidelines. "We are especially committed to respecting and protecting human rights and have undertaken to uphold the principles of the United Nations Global Compact in relation to human rights, labor standards, the environment and anti-corruption." [BCG - We treat each other with respect, 2016: <a href="http://infineon.com">infineon.com</a>]</li> <li>Met: UNGC principles 1 &amp; 2: See above. [BCG - We treat each other with respect, 2016: <a href="http://infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company committed to uphold the UNGC principles. "We are especially committed to respecting and protecting human rights and have undertaken to uphold the principles of the United Nations Global Compact in relation to human rights, labor standards, the environment and anti-corruption." [BCG - We treat each other with respect, 2016: <a href="http://infineon.com">infineon.com</a> &amp; UN Global Compact, 2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Explicitly list ALL four ILO for ICT suppliers: The Company explicitly lists its demands to its suppliers which include a prohibition of all forms of child and forced labor and requires its suppliers not to tolerate any discrimination,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>harassment or offense. However, there is no description of the right to bargain collectively and freedom of association. [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Company discloses that 'observe and promote the basic fundamental principles defined in the conventions of the International Labor Organization such as the protection against discrimination in selection, hiring occupation and promotion of employees, the right to form employee representative bodies, and the rejection of child labor and any form of forced labor. With respect freedom of association and collective bargaining, the Company indicates: 'We respect and acknowledge the right of employees to form representative bodies to conduct collective bargaining negotiations on working conditions.' [Business Conduct Guideline: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company commits to protecting the health and safety of workers. "The first priority in terms of our responsibilities for our employees is the prevention of health and safety risks." [Infineon CSR Policy, 07/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Met: H&amp;S applies to ICT suppliers: The Company states in its supplier code that 'we are committed to protect our employees' health and safety. Consequently, our Suppliers shall provide a safe and healthy working environment for all their employees and minimize all risks and hazards at all workplaces in order to protect the health and wellbeing of their employees, contractors and third parties visiting the premises'. [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: working hours for workers: The Company does not make a strong commitment to respecting worker's working hours as it only states its accordance with local requirements and "reasonable working hours". [BCG - We treat each other with respect, 2016: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Working hours for ICT suppliers: The Company expects suppliers respect workers working hours. "Furthermore, we compensate our employees fairly for their work with wages that meet at least minimum legal standards and adhere to the applicable laws, regulations and agreements on working hours and general working conditions. Our Suppliers shall comply with these principles." However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. In addition, it is not clear what 'exceptional or unusual situations would be. [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</li> </ul>
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Responsible mineral sourcing in conflict areas: The Company commits to source minerals responsibly. "Infineon is committed to the target that its products must not contain "Conflict Minerals that directly or indirectly finance or benefit armed groups or conflicts such as the ongoing conflict in the Democratic Republic of Congo and adjoining countries". However, it is not clear whether the commitment is extensive to high risk areas beyond DRC and adjoining countries. [BCG - We treat each other with respect, 2016: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Met: Based on OECD Guidance: The Company states its due diligence program are 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 Mineral Supply Chains from Conflict-Affected and High-Risk Areas ("OECD Guidance"). [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Requires responsible mineral sourcing from suppliers: The Company "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." However, it is not clear if the company requires supplier to commit to responsible mineral sourcing. [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers: "Infineon suppliers are requested to urge smelters and refiners identified in their supply chain to complete an independent third-party conflict minerals audit process and remove those which have not passed or are unwilling to participate in such an audit from their supply chain. However, it is not clear if the company requires supplier to commit to the responsible sourcing of all minerals. [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: Although the Company discloses its processes for stakeholder engagement, it does not have a commitment to engage with its affected stakeholders. [Materiality Disclosure and Target Setting, 12/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects ICT suppliers to reflect company HRD commitments</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The Company's Corporate Social Responsibility Policy is approved by its Management Board, which consists of its CEO, COO and others. [Infineon CSR Policy, 07/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Board level responsibility for HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to the 10 principles of the UN Global Compact. [UN Global Compact, 2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for ICT in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See above (A.1.2.). [Infineon CSR Policy, 07/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Communicates its policy to all workers in own operations</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions: See above. [Infineon CSR Policy, 07/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers: The Company expects its suppliers to support only three of the four ILO core conventions, failing to mention freedom of association/collective bargaining. [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Communicating policy down the whole ICT supply chain</li> <li>• Not met: Requiring ICT suppliers to communicate policy down the chain</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on ICT suppliers</li> </ul>
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: The Business Conduct Guidelines are globally binding rules applicable to every employee, each member of the Managing Board of Infineon Technologies AG and to each member of the Board of Directors or similar body of Infineon Group Companies. Participation in training in this field is mandatory and is repeatedly carried out at regular intervals. [BCG - We treat each other with respect, 2016: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Trains relevant ICT managers including procurement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring ICT suppliers: The Company fails to describe how it monitors suppliers' CSR performance within our sphere of influence. [Infineon CSR Policy, 07/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of ICT supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects ICT selection of suppliers</li> <li>• Met: HR affects on-going ICT supplier relationships: Infineon states that it expects its suppliers to be committed to the same values of the Company. It requires suppliers and vendors to comply with all valid laws including those dealing with human rights as well as fair business practices. In its Slavery and Human Trafficking Statement it explicitly explains its process of blocking a company where deviation is identified. [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a> &amp; Slavery and Human Trafficking Statement, 03/2019: <a href="http://infineon.com">infineon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with ICT suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The last materiality disclosure published by the Company dates back to 2018. The Materiality Analysis procedure consists of the following steps: " 1. Identify Sustainability Topics; 2. Discussion with Expert Departments; 3. Analyze the Assessment Results; 4. Reporting the Material Topics" and the Company breaks each step in topics in its document and under the first topic it list 'stakeholder engagement mapping.' However, it is not clear if the Company identifies and/or engages with affected and potentially affected stakeholders. [Materiality Disclosure and Target Setting, 12/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in ICT SC engaged</li> <li>• Not met: Communities in the ICT SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Analysis of stakeholder views and company's actions on them: Based on the results of its assessment, the Company disclosed the most material topics, some of which were related to human rights. [Materiality Disclosure and Target Setting, 2017: <a href="http://infineon.com">infineon.com</a>]</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in ICT suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in ICT supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	evaluating the effectiveness of actions to respond to human rights risks and impacts		<ul style="list-style-type: none"> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including ICT suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company states its grievance channel is called Infineon Integrity Line and it "can be used to report possible violations of national regulations or internal guidelines - personally or anonymously. The channel is open to all employees, business partners, customers or other stakeholders. [Compliance Guideline Anticorruption, 11/2018: <a href="http://infineon.com">infineon.com</a> &amp; Business Ethics, 2019: <a href="http://infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: The Company's Infineon Integrity Line is available in local languages in addition to English. [Compliance Guideline Anticorruption, 11/2018: <a href="http://infineon.com">infineon.com</a> &amp; Business Ethics, 2019: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Met: Opens own system to ICT supplier workers: See above. The Company's Infineon Integrity Line channel is open to suppliers. [Compliance Guideline Anticorruption, 11/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company states its grievance channel is called Infineon Integrity Line and it "can be used to report possible violations of national regulations or internal guidelines - personally or anonymously. The channel is open to all employees, business partners, customers or other stakeholders. [Compliance Guideline Anticorruption, 11/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The company's integrity line is translated into eight different languages. [Business Ethics, 2019: <a href="http://infineon.com">infineon.com</a> &amp; Infineon CSR Policy, 07/2018: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Met: ICT supplier communities use global system: See above (C.1.). [Compliance Guideline Anticorruption, 11/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: ICT suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> <li>• Not met: Who is handling the complaint</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company explicitly states "Reporting of Compliance Concerns 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 are treated confidentially and include a non-retaliation policy." [Business Ethics, 2019: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company states in its Infineon Integrity Line that encryption is used when ensuring that all those who make a complaint remain anonymous. "When setting up your secured post-box, please select your own pseudonym/user name and password. Your report is kept anonymous through encryption and other specialized security measures. Do not submit any information that can be traced back to you if you would like to remain anonymous. You will never be asked for personal information at any time during the reporting process. Please do not use a computer provided by your employer to submit your report." [Integrity Line, Not Available: <a href="http://bkms-system.net">bkms-system.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Met: Expects ICT suppliers to prohibit retaliation: The Company expects its suppliers do not allow retaliation. "In addition, our Suppliers shall ensure that their employees are able to communicate and share grievances openly with management regarding working conditions and management practices without any fear of reprisal, intimidation or harassment." [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

#### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage target timeframe: The Company does not commit to paying a living wage for workers, nor does it demand suppliers do the same for their employees. "While we recognize and respect cultural differences, we believe that workers should be employed on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs. We recruit, select, train, promote and compensate employees solely on the basis of work-related criteria. Furthermore, we compensate our employees fairly for their work with wages that meet at least minimum legal standards and adhere to the applicable laws, regulations and agreements on working hours and general working conditions. Our Suppliers shall comply with these principles." [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes how living wage determined</li> <li>• Not met: Achieved payment of living wage</li> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company explicitly states it does not tolerate the use of child labor. "We uphold and promote the fundamental principles defined in the conventions of the International Labour Organization (ILO), such as protection from discrimination in the selection, hiring, employment and promotion of employees, the right to form workers' councils, as well as the rejection of child labor and all forms of forced labor." [UN Global Compact, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> <li>• Not met: Age verification of job applicants and workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remediation if children identified</li> </ul>
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: The Company expects suppliers do not employ children but does not demand age verification processes. "We are against all forms of child labor. Our Suppliers shall not permit work to be carried out by persons under the age of 15." [Principles of Purchasing, 10/2014: <a href="https://www.infineon.com">infineon.com</a>]</li> <li>• Not met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Pays workers in full and on time</li> <li>• Not met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Debt and fees rules in codes or contracts</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Does not retain documents or restrict movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How sure about agencies or brokers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation</li> <li>• Met: Discloses % covered by collective bargaining: The Company discloses data about employees covered by collective arrangements. "Around 82 percent of our employees work at sites that have entered into collective agreements and where independent employee representatives are in place. More than 90 percent of our employees work at production sites where committees are in place that also offer employers, employees and/or employee representatives the opportunity to discuss and receive advice on topics relating to environmental protection, occupational safety and health." [UN Global Compact, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: The Company discloses data about injury rates, lost days rate and fatalities in its Sustainability Report. "There were no fatal work-related accidents at Infineon in the 2018 fiscal year. Our Injury Rate of 0.47 in the b2018 fiscal year is presented on the margin in the graphic above. The Lost Day Rate of 6.05 in the 2018 fiscal year is illustrated in the margin in the graphic below." [Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> <li>• Met: Lost days or near miss disclosure: See above. [Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> <li>• Met: Fatalities disclosures: See above. [Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> <li>• Not met: Occupational disease rates: On Its sustainability report the company state that "Infineon has currently no globally harmonized information for the reporting of occupational diseases." [Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance: The Company states it has a health and safety target when disclosing data about injuries and lost days. However, we could not identify any information in regards to the value. [Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a> &amp; Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> <li>• Not met: Met targets or explains why not: See above. [Sustainability at Infineon 2018, 2018: <a href="https://www.infineon.com">infineon.com</a>]</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Sets out clear Health and Safety requirements</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> <li>• Not met: Occupational disease rates</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Process to stop harassment and violence</li> <li>• Not met: Working conditions take account of gender</li> <li>• Not met: Equality of opportunity at all levels</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Meets all of the requirements under score 1
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Respects max hours, min breaks and rest periods in its own operations: The Company does not indicate it follows international standards for working hours including maximum working hours and minimum breaks. "Furthermore, we compensate our employees fairly for their work with wages that meet at least minimum legal standards and adhere to the applicable laws, regulations and agreements on working hours and general working conditions. Our Suppliers shall comply with these principles." [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a> ] Score 2 • Not met: How it implements and checks this
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Working hours in codes or contracts: The Company expects suppliers to adhere to local working hours laws, but did not state the same for international standards, including maximum working hours and minimum breaks. "Furthermore, we compensate our employees fairly for their work with wages that meet at least minimum legal standards and adhere to the applicable laws, regulations and agreements on working hours and general working conditions." [Principles of Purchasing, 10/2014: <a href="http://infineon.com">infineon.com</a> ] • Not met: How working with suppliers on working hours Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Responsible mineral sourcing due diligence in supplier contracts: Although the Company states it takes has a framework for ensuring the sourcing of minerals is made responsibly, it does not explicitly state anywhere that it included this requirement into commercial contracts. "Infineon is taking systematic steps for responsible sourcing 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 that is "DRC Conflict Free" <sup>2</sup> . These systematic steps are 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 Mineral Supply Chains from Conflict-Affected and High-Risk Areas ("OECD Guidance")." [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a> ] • Not met: Builds capacity with smelters/refiners Score 2 • Not met: Disclosure of smelter information in supplier requirements • Not met: Responsible conflict mineral sourcing covers all minerals: The Company explicitly only included tantalum, tin, tungsten and gold in its Conflict Free Minerals framework. [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a> ]
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Risk identification and disclosure in line with OECD Guidance: The Company urges its suppliers to identify their smelters, but no evidence found no how it identifies and discloses risks. "Infineon suppliers are requested to urge smelters and refiners identified in their supply chain to complete an independent third-party conflict minerals audit process and remove those which have not passed or are unwilling to participate in such an audit from their supply chain." [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a> ] • Not met: Identification of smelter/refiners and OECD due diligence: "Infineon requires that suppliers whose products contain tantalum, tin, gold and tungsten submit this information to Infineon using the standardized Conflict Minerals Reporting Template". However, no further details found on the process, including how it assesses smelters to be conformant with the due diligence process based on OECD Guidelines.. [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Discloses smelters/refiners judged in line with OECD due diligence</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals: The Company does not explicitly include all minerals in this assessment. "Infineon suppliers are requested to urge smelters and refiners identified in their supply chain to complete an independent third-party conflict minerals audit process and remove those which have not passed or are unwilling to participate in such an audit from their supply chain." [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul>
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes mineral risk management plan for supply chain</li> <li>Not met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company states noncompliance to this requirement may result reassessment of supplier relations, but it does not disclose the processes for doing so. "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." [Conflict Minerals Policy, 09/2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Supplier and stakeholders engaged in risk management strategy</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 10.37 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.59 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.92 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Infineon Technologies AG made data public that met one or more elements of the methodology in 12 cases, leading to a disclosure score of 0.92 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>Met: Company reports on GRI: The Company reports its Sustainability Report 2018 on GRI. [Sustainability at Infineon 2018, 2018: <a href="http://infineon.com">infineon.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Infineon Technologies AG met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>Not met: Score 2 for A.2.2 : Board discussions</li> <li>Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations)</li> <li>Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

#### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.