

Company Name Infineon Technologies AG
Industry ICT (Own operations and Supply Chain)
Overall Score 13.5 out of 100

Theme Score	Out of	For Theme
2.0	10	A. Governance and Policies
2.3	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
3.0	25	D. Performance: Company Human Rights Practices
2.7	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Business Conduct Guidelines (Company's code of ethics) states that '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'. [Business Conduct Guidelines, 2021: infineon.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Company states in its CSR Policy: 'We support and respect international standards and principles, such as [...] the principles of the International Labour Organization (ILO), [...] and the UN Guiding Principles on Business and Human Rights'. [CSR Policy, 10/2021: infineon.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company states in its CSR Policy: 'We support and respect international standards and principles, such as [...] the principles of the International Labour Organization (ILO), [...]'. See below description of specific commitment to each ILO core Area. [CSR Policy, 10/2021: infineon.com] Met: Company has an 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

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			<p>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 Guidelines, 2021: infineon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: No evidence found in the supplier code of an explicit requirement of commitment to the ILO Declaration. See below description of specific commitments to ILO core areas of Fundamental rights. [Supplier Code, 2021: infineon.com] • Not Met: Company explicitly list All four ILO for suppliers: The Company's Supplier Code includes provisions related to all ILO Core. With respect the rights to freedom of association and collective bargaining, it indicates: 'Infineon Technologies expects its suppliers to respect workers' rights to freedom of association and collective bargaining in accordance with local legal requirements. Workers' rights to associate with others, form and join (or refrain from joining) must not be a subject for harassment, or discrimination or retaliation.' However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with local legal requirements'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Code, 2021: infineon.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to respect H&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 safety and health risks.' In addition, in its Supplier Code, it states: 'Infineon Technologies is committed to protect our employees' health and safety.' [CSR Policy, 10/2021: infineon.com] & [Supplier Code, 2021: infineon.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: No evidence found of a formal commitment to respecting worker's working hours as it only states its accordance with regional conditions and 'reasonable working hours'. Although the Company is committed to ILO fundamental principles. This subindicator looks for an explicit commitment to respect standards on working hours. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and paid at a premium rate. Commitments are expected to be placed in formal policy documents. Periodic reports are not considered a suitable source for policy statements under CHRB revised approach. [Business Conduct Guidelines, 2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company indicates in its Supplier Code: 'our suppliers shall provide a safe and healthy working environment for all their employees, monitor workers' potential for exposure to safety hazards, and minimize all risks and hazards at all workplaces in order to protect the health and well-being of their employees, contractors and third parties visiting the premises. Suppliers shall implement an occupational health and safety training management system determining when and how to use the equipment correctly and educational materials about risks associated with these hazards'. [Supplier Code, 2021: infineon.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect Working hours, the Company requires: 'Our suppliers shall meet local legal working hour and rest day requirements. Suppliers shall ensure overtime is voluntary and paid in accordance with local and national laws and regulations. Suppliers shall keep employee working hour and pay records in accordance with legal local and national laws and regulations. A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring suppliers to commit to a 48 hours regular working week, and paid at a premium rate.
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry –	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"> • Not Met: Responsible mineral sourcing: The Company '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'. The policy also indicates Infineon is taking systematic steps for responsible sourcing to avoid the use of

Indicator Code	Indicator name	Score (out of 2)	Explanation
	responsible sourcing of minerals (ICT)		<p>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”. However, it is not clear whether the commitment is extensive to responsible sourcing beyond financing or benefiting armed groups in DRC. The part of the policy where it refers to adjoining countries refers to the target. and that is taking steps for responsible sourcing. No general and direct commitment found to responsible sourcing of minerals. The sustainability report indicates that 'we request that our suppliers continue purchasing only raw materials from smelters that meet the Responsible Minerals Assurance Process requirements or those of an equivalent auditing program. Commitments are expected to be placed in formal policies. Sustainability reports or other periodic reports are not considered a suitable source for policy statements under CHRB's revised approach. [Conflict Minerals Policy, 2021: infineon.com]</p> <ul style="list-style-type: none"> • Met: Based on OECD Guidance: The Company states in its Conflict Minerals Policy that its due diligence program is '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, 2021: infineon.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The Supplier Code of Conduct concerning the Responsible Sourcing of Conflict Minerals requires to 'to exercise due diligence on the source and chain of custody of Conflict Minerals in its supply chain e.g., by participation in established supply chain communication processes such as the “Responsible Minerals Assurance Process (RMAP)” and/or by application of a nationally or internationally recognized supply chain due diligence standard such as the OECD Guidance.' [Supplier Code for a Responsible Sourcing of Conflict Minerals, 2018: infineon.com] & [Conflict Minerals Policy, 2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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"> • Not Met: Women's rights: Although the Company's Business Conduct Guidelines has a commitment to diversity and non discrimination, no evidence found of an explicit commitment to respect women's rights. The Company has provided additional sources to this indicator. However, this subindicator looks for a explicit commitment to respect women's rights (or children's or migrant's rights as per subindicator below). This commitment is expected to be placed in a formal policy statement document. [Business Conduct Guidelines, 2021: infineon.com] & [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Children's rights • Not Met: Migrant worker's rights • Met: Expects suppliers to respect at least one of these rights: The Company indicates in its Supplier Code: 'Infineon Technologies expects its suppliers to ensure that both domestic and foreign migrant workers face no risk of exploitation and ensure migrant workers are not discriminated against in respect to these standards. Our suppliers shall only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations.' [Supplier Code, 2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights: The Company has provided feedback to CHRB regarding this subindicator. However, no explicit commitment found to any of the initiatives required by this indicator. [Supplier Code, 2021: infineon.com]
A.1.4	Commitment to remedy	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"> • Not Met: The Company commits to remedy: The Company has mechanisms for reporting violations. The Business conduct guidelines state that 'we ensure our response is always fitting, and determine for each case which consequences are suitable, necessary and reasonable'. However, this indicator looks for evidence of a formal statement of commitment to remedy any adverse impacts on workers and individuals/communities that it has caused or contributed to. Commitments are

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>expected to be placed in formal policies. [Business Conduct Guidelines, 2021: infineon.com]</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to make this commitment: The Company has provided feedback to CHRB regarding this indicator. However, no explicit requirement to suppliers to remedy any adverse that they have caused or contributed to was found. [Supplier Code, 2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	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"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to make this commitment • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> • Not Met: Board level responsibility for HRs: The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] & [CSR Policy, 10/2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe HR expertise of Board member • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	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"> • Not Met: Board/Committee review HRs strategy: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] & [CSR Policy, 10/2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Examples/trends re HR discussion in the last reporting period • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	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"> • Not Met: Incentives for at least one board member: The Company indicates that 'our sustainability targets for climate protection and diversity are reflected in the revised compensation targets for the Management Board and for executives'. It is not clear, however, what does the diversity target entail (if faces the issue of vulnerable groups or discrimination) and whether it reaches Board of Directors' members (compensation for senior executives is assessed in B.1.2). [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: At least one key HR risk, beyond employee H&S • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and 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"> • Not Met: Board process to review bussiness model and strategy: The Company indicates in its UN Global Compact Communication on Progress that ' Our CSR describes our strategic CSR focus areas and our voluntary commitment to fulfil the corresponding obligations'. Also, the Company reports in relation to its materiality assessment to evaluate stakeholders expectations and requirements. It states that 'we assembled our in-house experts to discuss the topics chosen and any potentially related risks or opportunities which could impact the long-term performance of the organization [...] the results of this analysis and the material topics were then confirmed by the Infineon Management Board'. However, this indicator looks for evidence of how the Board of Directors has a process in place to review its business model or its business strategy for inherent risks to human rights. Current evidence focus on how topics important for stakeholders can affect the Company. This process is expected to provide evidence of human rights being covered. [UN Global Compact Communication on Progress, 2021: infineon.com] & [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com]

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			<ul style="list-style-type: none"> • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making: Although the CSR policy is foreworded and signed by senior management, this subindicator looks for explicit evidence of the Company indicating who is the senior person/committee accountable for implementation and decision making on human rights issues within the Company. The policy includes human rights, but does not seem to indicate who is held accountable for its implementation. [CSR Policy, 10/2021: infineon.com] Score 2 <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
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"> • Not Met: Senior manager incentives for human rights: The Company indicates that 'our sustainability targets for climate protection and diversity are reflected in the revised compensation targets for the Management Board and for executives'. It is not clear, however, what does the diversity target entail (if faces the issue of vulnerable groups or discrimination). [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
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"> • Not Met: HR risks is integrated as part of enterprise risk system • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates that 'all the company employees are trained on the content [of the Business Conduct Guidelines, which include human rights commitments] on a regular basis in web-based sessions or face-to-face. In the 2021 fiscal year, all former Cypress employees were enrolled in relevant Business Conduct Guidelines training'. Training is assumed to take place in local language. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] Score 2 <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Company indicates that 'The various Infineon divisions and departments use different communication channels and continuously engage in conferences, forums, industry association activities and surveys to ensure targeted communication with the corresponding stakeholder groups.' However, there is no mention to local communities and other groups that may be affected. [UN Global Compact Communication on Progress, 2021: infineon.com] • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain: The Company indicates that 'Business partners are contractually obliged to comply with the legal regulation. Suppliers acknowledge our Supplier Code of Conduct [...] when signing the contract'. However, no evidence found on how the Company

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			<p>communicates the supplier code down the supply chain, to indirect suppliers (or requires its suppliers to do so). [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com]</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to communicate policy requirements <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company indicates that 'Business partners are contractually obliged to comply with the legal regulation. Suppliers acknowledge our Supplier Code of Conduct [...] when signing the contract'. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates that 'all the company employees are trained on the content [of the Business Conduct Guidelines, which include human rights commitments] on a regular basis in web-based sessions or face-to-face. In the 2021 fiscal year, all former Cypress employees were enrolled in relevant Business Conduct Guidelines training'. Training is assumed to take place in local language. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Trains relevant managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: Although the company indicates in its Supplier Code of Conduct that 'Suppliers shall periodically provide workers with information and training on all grievance procedures.' However, no information on human rights training found. [Supplier Code, 2021: infineon.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates that 'our expanded supplier management portal offers our suppliers a central portal for registration and the automated update of relevant information such as compliance, sustainability, environmental protection, occupational safety, labor standards and social standards. Additionally, this portal allows for suppliers to submit updated certifications. We encourage all suppliers to be certified in accordance with international standards'. It also states that depending on supplier categorization, 'the supplier receives up to ten questionnaires on various topics in the supplier management portal. The responses received are evaluated by the relevant Infineon specialist departments [...]'. No evidence was found, however, in relation to how the Company monitors compliance with human rights within its own operations. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Met: Proportion of supply chain monitored: It also states that 'The annual re-evaluation of selected suppliers serves to determine whether or not corrective measures need to be initiated. Each year, around 400 existing suppliers, representing approximately 75% of the procurement volume, are re-evaluated with regard to the topics mentioned'. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process: The Company states that following evaluation, 'when necessary, improvement measures are jointly agreed with the supplier'. No further details found, including the process for applying corrective actions. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating 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"> • Met: HR affects selection of suppliers: The Company state 'A long-term partnership between Infineon and its suppliers is a core element of our corporate philosophy. In the course of this partnership, our suppliers are managed centrally in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>a supplier management portal where data is updated as necessary. This system is also used for supplier evaluation. Our requirement in the area o CSR is highly relevant when selecting suppliers, evaluating existing suppliers and for future supplier development. In 2020, we expanded the CSR questionnaire to include more detail HR questions.' [Slavery and Human Trafficking Statement 2021, 03/2021: infineon.com]</p> <ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: As above. The Company indicates in its Slavery and Human Trafficking Statement that is uses a questionnaire to select and evaluate suppliers. In addition the company state that these 'questionnaires are evaluated by Infineon specialists. In case any deviation is identified, this will be discussed direct with suppliers [...] and the suppliers that could be a risk will be classified as 'red light' and can not be put in the system for ordering or for doing business with Infineon.' [Slavery and Human Trafficking Statement 2021, 03/2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements: The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. This subindicator looks for a description of how the Company proactively works with suppliers to help them improve performance and meet HR requirements. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com]
B.1.8	Approach to engagement with affected stakeholders	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"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The last materiality disclosure published by the Company dates back to 2019. 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.' There is a 'stakeholder engagement mapping', but it is not clear how the company define the affected stakeholders and how they have engaged with them in the past two years. [Materiality Disclosure and target setting, 11/2019: infineon.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders: The Company has provided feedback to CHRB in relation to this subindicator. However, evidence was not material. This subindicator looks for evidence of how the Company reports specific examples of dialogue held with affected stakeholders, and that engagement including human/labour rights topics. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues: Although the Company reports in relation to its materiality assessments, no details found of analysis of affected stakeholders views specifically on human rights issues. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] & [Materiality Disclosure and target setting, 11/2019: infineon.com] • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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"> • Not Met: Identifying risks in own operations • Not Met: Identifying risks through relevant business relationships: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. This subindicator looks for a proactive process of due diligence that allows the Company identify what are the potential human rights risks and impacts that it faces through the supply chain. Evidence found refers to supplier management in relation to compliance with Company standards (evaluated in indicator B.1.6) [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified

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B.2.2	Assessing 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"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. This subindicator looks for a proactive process of due diligence that allows the Company identify what are the potential human rights risks and impacts that it faces through the supply chain. Evidence found refers to supplier management in relation to compliance with Company standards (evaluated in indicator B.1.6) [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Public disclosure of the results of HR assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to 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"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights 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"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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. [Integrity Line, N/A: bkms-system.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The Company's Infineon Integrity Line is available in local languages such as Spanish, Indonesian, German, Korean and others, in addition to English. In addition, the Company indicates that 'All the company's employees are trained on the content on a regular basis in web-based sessions or face-to-face'. [Integrity Line, N/A: bkms-system.net] & [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The company indicates that '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. 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. 'Also, the company channels are open to suppliers and other stakeholders. [Supplier Code, 2021: infineon.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The supplier code indicates that 'each of our suppliers shall ensure that its affiliates, contractors and subcontractors also comply with all

Indicator Code	Indicator name	Score (out of 2)	Explanation
			requirements described herein'. [Supplier Code, 2021: infineon.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> • Met: Grievance mechanism for community: The company indicates that 'Infineon provides this whistleblowing portal to employees and external persons in order to receive reports on potential violations of the law and internal regulations.' [Integrity Line, N/A: bkms-system.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Company disposes eight languages to the community, based on its location. However, not clear how stakeholders are made aware. [Integrity Line, N/A: bkms-system.net] • Not Met: Communities access mechanism direct or through suppliers: The Company has provided feedback regarding this indicator. However, no details found in relation to whether suppliers' external affected stakeholders can file complaints in relation to suppliers' behavior • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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"> • Not Met: Response timescales and how complainants will be informed: The Integrity line website indicates that 'When setting up your secured postbox, please select your own pseudonym/ user name and password. [...] Via the secured postbox, the responsible Regional Compliance Officer will give you feedback on the further processing of your information, or ask you questions if some details are still unclear - you remain anonymous throughout the dialogue. We are interested in reports to avoid damage, not in you as a whistleblower'. However, no details were found in relation to estimated timescales for addressing complaints. [Integrity Line, N/A: bkms-system.net] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	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"> • Not 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." However, no public statement prohibiting retaliation was found. [Business Ethics, N/A: infineon.com] • 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, N/A: bkms-system.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-	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"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
	judicial grievance mechanisms		<ul style="list-style-type: none"> • Not Met: Example of issue resolved (if applicable)
C.7	Remediating adverse 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"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company reports figures in relation to 'possible compliance breaches' for the last five reporting years. There's a breakdown indicated of total reports, how many are under investigation, which are confirmed cases of compliance breaches and confirmed as non-breach. However, it is not clear the number of complaints related to human rights and the outcome of these for the different affected groups (i.e. company workers, suppliers, communities). [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How lessons from mechanism improve management system • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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"> • Not Met: Pays living wage or sets target date • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage: The Company states in its CSR Policy that 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, no further information on whether the company is paying a living wage. [CSR Policy, 10/2021: infineon.com] • Not Met: Definition of living wage reviewed with unions
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"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Company indicates that 'Infineon Technologies compensates its employees fairly for their work with wages that meet at least minimum legal standards and adhere to the applicable laws, regulations and agreements on general working conditions. We expect our suppliers to provide their workers a fair compensation, (including overtime pay and benefits) that, at a minimum, meet the legal minimum standards.' However, no information about living wage found. [Supplier Code, 2021: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	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"> • Not Met: Avoids business model pressure on HRs (purchasing practices): The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of 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"> • 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'. [Sustainability at Infineon, 11/2019: infineon.com] • Not Met: Age verification of workers recruited Score 2 <ul style="list-style-type: none"> • Not Met: Remediation if children identified: The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. [Business Ethics, N/A: infineon.com]
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: The Company indicates that 'Infineon Technologies is against all forms of underage labor. Our suppliers must not permit work to be carried out by persons under the age of 15 and under the applicable minimum legal age for employment.' [Supplier Code, 2021: infineon.com] • Not Met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.a	Prohibition of forced labour: Recruitment fees and 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"> • Not Met: Job seekers and workers do not pay recruitment fee • Not Met: Commits to fully reimbursing if they have paid Score 2 <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Company states that 'Workers must not be required to pay recruitment expenses either in their home country or the country where work is performed.' [Supplier Code, 2021: infineon.com] • Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (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"> • Not Met: Pays workers in full and on time: The Company states that 'our employees are compensated in accordance with applicable wage legislation and in compliance with the respective applicable minimum wage, regulations on overtime hours and legally prescribed additional benefits'. However, no explicit indication found on paying workers in full and on time. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.d	Prohibition of forced labour: Wage practices (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"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Company states that 'Our suppliers shall meet local legal working hour and rest day requirements. Suppliers shall ensure overtime is voluntary and paid in accordance with local and national laws and regulations. Suppliers shall keep employee working hour and pay records in accordance with legal local and national laws and regulations.' However, there is no mention to pay workers in full and on time. [Supplier Code, 2021: infineon.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of forced labour: Restrictions on workers (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"> • Not Met: Does not retain documents or restrict movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.f	Prohibition of forced labour: Restrictions on workers (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"> • Not Met: Free movement rules in codes or contracts: The supplier code states that 'Suppliers shall ensure that all work is voluntary. Hence, we demand that suppliers reject forced labor, including indentured labor, bonded labor and any other form of forced labor. Infineon Technologies does not tolerate suppliers that traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction or fraud. All work shall be voluntary, workers shall be free to leave work and terminate their employment or other work status with reasonable notice. Workers must not be required to pay recruitment expenses either in their home country or the country where work is performed'. No evidence found, however, of a explicit requirement prohibiting suppliers from retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use company provided accommodation'. [Supplier Code, 2021: infineon.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company's code states that 'We respect and acknowledge the right of employees to form representative bodies to conduct collective bargaining negotiations on working conditions. The management at the location and the employee representative bodies must work together closely in a spirit of trust. [...]. Even in the event of disputes, we still strive to maintain a sustainable working relationship. See below. High percentages of collective bargaining coverage are considered a proxy for measures in place to avoid intimidation or retaliation. [Business Conduct Guidelines, 2021: infineon.com] • Met: Discloses % total direct operations covered by collective CB agreements: The Company discloses data about employees covered by collective arrangements. 'Around 86 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'. [Sustainability at Infineon, 11/2019: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (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"> • Not Met: FoA & CB rules in codes or contracts: The Company states in its that 'Infineon Technologies expects its suppliers to respect workers' rights to freedom of association and collective bargaining in accordance with local legal requirements. Workers' rights to associate with others, form and join (or refrain from joining) must not be a subject for harassment, or discrimination or retaliation.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. The Company has provided feedback regarding this indicator. However, evidence is already in use. [Supplier Code, 2021: infineon.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	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"> • Met: Describes process to identify H&S risks and impacts: In relation to this issue, the Company indicates that 'here we take a preventive approach. Our Occupational Safety and Health Management System has been certified in accordance with ISO 45001. Workplace-related risk assessments carried out worldwide ensure that workplace-related risks that may result in a danger to employees are identified and the protective measure required as implemented to minimize risks. Risks are evaluated according o the Nohl risk matrix and measures are subsequently adopted based on the STOP hierarchy. This means that, where possible, substitution and technical measures take precedence over organizational or personal measures. [CSR Policy, 10/2021: infineon.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company reports injury rate and lost day rate for the last five reporting years. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Met: Discloses Fatalities for last reporting period: The Company discloses in its Sustainability Report that 'there were no fatal work-related accidents at Infineon in the 2021 fiscal year'. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Occupational disease rate for last reporting period: On Its sustainability report the company state that 'Infineon has currently no globally harmonized information for the reporting of occupational diseases'. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance [Sustainability at Infineon, 11/2019: infineon.com] • Not Met: Met targets or explain why not or what is doing to improve management systems
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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"> • Met: Sets out clear Health and Safety requirements: The Company states in its Supplier Code of Conduct that 'Infineon Technologies is committed to protect our employees' health and safety. Consequently, our suppliers shall provide a safe and healthy working environment for all their employees, monitor workers' potential for exposure to safety hazards, and minimize all risks and hazards at all workplaces in order to protect the health and well-being of their employees, contractors and third parties visiting the premises. Suppliers shall implement an occupational health and safety training management system determining when and how to use the equipment correctly and educational materials about risks associated with these hazards. Furthermore, our suppliers shall implement and administer an occupational health and safety system according to ISO 45001 or its equivalent. [Supplier Code, 2021: infineon.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.a	Women's rights (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"> • Not Met: Process to stop harassment and violence against women: The Company's code includes commitments against discrimination. However, no explicit processes found to stop harassment against women. [Business Conduct Guidelines, 2021: infineon.com] & [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Working conditions take account of gender • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates that 'the promotion of women to management positions is one of the key focus areas of our Diversity & Inclusion activities. The target we had set ourselves for the end of the 2020 fiscal year of increasing the percentage of female managers to 15 percent we also achieved at the end of the 2021 fiscal year, with 16% of female managers in middle and senior management positions. We continue to pursue our long-term goal of increasing the percentage of women in management positions to 20% by 2030'. However, no references were found in relation to addressing gender pay gap at all levels of employment. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.4.8.b	Women's rights (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"> • Not Met: Women's rights in codes or contracts: Although the supplier code includes requirements on non-discrimination, no evidence found of requirements regarding all of paying equal pay for equal work, eliminating health and safety concerns particularly prevalent among women workers and introducing measures to ensure equal opportunities throughout all levels of employment. [Supplier Code, 2021: infineon.com] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.a	Working hours (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"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: Although the Company states in its Business Conduct Guidelines that 'We abide by local statutory requirements and grant in particular the following in accordance with regional conditions reasonable'. However, there is no mention to maximum or minimum hours. [Business Conduct Guidelines, 2021: infineon.com] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.4.9.b	Working hours (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"> • Not Met: Working hours in codes or contracts: The Company states in its Supplier Code that 'Our suppliers shall meet local legal working hour and rest day requirements. Suppliers shall ensure overtime is voluntary and paid in accordance with local and national laws and regulations. Suppliers shall keep employee working hour and pay records in accordance with legal local and national laws and regulations. A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations. 'However, respecting legal maximum hours in each country is not enough for respecting ILO conventions on working hour. The Company has provided feedback to CHRB regarding this indicator. However, evidence is already in use. [Supplier Code, 2021: infineon.com] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates in its Supplier Code of Conduct concerning the Responsible Sourcing of Conflict Minerals that 'to exercise due diligence on the source and chain of custody of Conflict Minerals in its supply chain e.g., by participation in established supply chain communication processes such as the "Responsible Minerals Assurance Process (RMAP)" and/or by application of a nationally or internationally recognized supply chain due diligence standard such as the OECD Guidance'. The Company indicates that 'Business partners are contractually obliged to comply with the legal regulation. Suppliers acknowledge our Supplier Code of Conduct [...] when signing the contract'. The Company has provided feedback to CHRB regarding this subindicator. However, this subindicator was already awarded. [Supplier Code for a Responsible Sourcing of Conflict Minerals, 2018: infineon.com] & [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information: The Company indicates that in 2021 'Infineon identified 100 percent of its potential suppliers of conflict minerals and evaluated them with regard to their use of conflict minerals. Based on the full response of our suppliers and in accordance with the requirements of the OECD guidance, we can duly state that all Infineon products are DRC conflict-free. Moreover, we request that our suppliers continue purchasing only raw materials from smelters that meet the Responsible Minerals Assurance Process requirements or those of an equivalent audit program'. Also, the 'supplier code of conduct concerning the Responsible Sourcing of Conflict Minerals' requires that suppliers 'make available to Infineon - upon Infineon's written request- all documentation and supporting evidence that demonstrate its due diligence measures'. However, it is not clear if suppliers are contractually obliged to disclose smelter/refiner information. (the Sustainability report refers contractual requirements for the supplier code, and this is a different document). [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] & [Supplier Code for a Responsible Sourcing of Conflict Minerals, 2018: infineon.com] • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	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"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The Company states that 'we identify their origin in close cooperation with our direct suppliers. For this purpose, we have introduced a standardized process throughout the organization based on the OECD Due Diligence Guidance [...] in order to create the necessary transparency within our supply chain'. However, no details found on the actual identification risk identification processes followed by the Company, and which are the risks that it has identified. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Met: Identification of smelter/refiners and OECD Guidance: The Company states that 'we identify their origin in close cooperation with our direct suppliers. For this purpose, we have introduced a standardized process throughout the organization based on the OECD Due Diligence Guidance [...] in order to create the necessary transparency within our supply chain'. In the 2019 fiscal year, Infineon identified 100 percent of its potential suppliers of conflict minerals and evaluated them with regard to their use of conflict minerals. Based on the thorough response of our suppliers and in accordance with the requirements of the OECD guidance, we can duly state that all Infineon products are DRC conflict-free. Moreover, we request our suppliers to continue purchasing only raw materials from smelters that meet the "Responsible Minerals Assurance Process" (RMAP) requirements or those of an equivalent auditing program.' [Sustainability at Infineon, 11/2019: infineon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company indicates that 'we can duly state that all Infineon products are DRC Conflict Free'. However, no details found in relation to the actual smelters and refiners used in its supply chain. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Risk identification and disclosure covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Reporting on responsible sourcing of minerals	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"> • Not Met: Describes mineral risk management plan for supply chain: The Company indicates that 'based on the full response of our suppliers and in accordance with the requirements of the OECD guidance, we can duly state that all Infineon products are DRC conflict-free. Moreover, we request that our suppliers continue purchasing only raw materials from smelters that meet the Responsible Minerals Assurance Process requirements or those of an equivalent audit program'. It is not clear, however, whether the Company considers that it risk is under control or whether it needs risk prevention/mitigation measures. [Sustainability at Infineon. Supplementing the annual report 2021, 2022: infineon.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

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		<ul style="list-style-type: none"> • Area: Forced labor; working hours; tight to security of persons • Headline: Infineon and other companies' suppliers accused of forced labour of migrant workers in Malaysia • Story: On June 28, 2019, Danwatch, a Danish investigative media and research centre, published an investigation report detailing alleged fundamental human and labour rights violations against Nepalese and Indonesian migrant employees working at Malaysian factories producing components for major electronics companies, including Infineon. The report is based on interviews with workers employed by labour agency JS Global, which supplies workers to manufacturing companies, including German industrial group Possehl, which supplies products to Infineon, ST Microelectronics, NXP, Texas Instruments, Vishay and Diodes Inc. Employees reported several allegations constituting some form of forced labour <ul style="list-style-type: none"> - excessive recruitment fees (exceeding amounts required by Malaysian government-approved agencies for the legalisation of workers' status) - arbitrary reductions of wages - violent threats when employees complained about wage reduction or non-payment - passport confiscation - excessive overtime work <p>[Danwatch, 28/06/2019, "Forced labour behind your screen": danwatch.dk]</p>
E(1).1	The company has responded publicly to the allegation	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"> • Met: Public response: Infineon's spokesperson, Diana Kaaserer, said Infineon was surprised by Danwatch's findings which she said violated the company's policies on workers' rights. "The cases described are not consistent with our self-commitment and requirements towards our supply chain. Consequently, we have addressed the concerns raised by the migrant workers to Possehl and requested comprehensive clarification", she wrote in an email to Danwatch. [Danwatch, 28/06/2019: danwatch.dk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company response does not engage with the details of the allegation and does not address the specifics of the allegation
E(1).2	The company has investigated and taken 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"> • Not Met: Engaged with stakeholders: The company states that it requested comprehensive clarification from Possehl. However, there is no information available that Possehl or Infineon Technologies AG has engaged with affected stakeholders. Possehl issued a response to an article on the allegations, however, this does not indicate engagement with affected stakeholders. [Danwatch, 28/06/2019: danwatch.dk] [Possehl, 01/07/2019, "Clarification/ reply to the article published by Spiegel+ on 28 June 2019": possehl.de] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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"> • Not Met: Provided remedy: Possehl claims to have paid outstanding wages directly to temporary workers voluntarily. There is no indication that Infineon Technologies applied any leverage on Possehl to persuade them to this move. [Possehl, 01/07/2019: possehl.de] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The issue of outstanding wages is just a minor part of the allegations. According to Possehl those were paid before the publication of the news article that referenced the allegations. The subsequent publication of the article and the Electronics Watch report demonstrate that the remedy provided by Possehl is not considered satisfactory. [Possehl, 01/07/2019: possehl.de] [Danwatch, 28/06/2019: danwatch.dk] • Met: Remedy delivered: Possehl claims to have paid outstanding wages directly to temporary workers. There is no evidence that the remedy was not delivered to the affected stakeholders. [Possehl, 01/07/2019: possehl.de] • Not Met: Independent remedy process used

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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