

Environmental, Health & Safety Policy

Document No.: EHS-POL-001 | Version: 2.0 | Effective Date: 5/4/2026 | Owner: Supply Chain Manager

1. Purpose and Scope

This policy establishes Infraeo Inc.'s commitment to protecting the environment and the health and safety of its employees, visitors, and business partners, and to delivering quality products and services in compliance with applicable law. It applies to all Infraeo employees, contractors, and facilities.

Infraeo operates a fabless, joint-design-manufacturing (JDM) model and does not conduct in-house manufacturing. This policy governs Infraeo's own office and engineering operations and defines the environmental, health, and safety (EHS) requirements Infraeo flows down to its JDM manufacturing partner and supply partners.

2. Policy Statement

Infraeo is committed to:

- Complying with all applicable environmental, health, and safety laws, regulations, and other requirements in the jurisdictions where it operates and where its products are made and sold.
- Providing a safe, healthy working environment and preventing work-related injury and illness.
- Minimizing the environmental impact of its operations, including responsible use of energy and materials and proper handling of waste and electronic equipment.
- Ensuring that products are designed and supplied to meet applicable product-safety and environmental-compliance requirements.
- Continually improving its EHS processes and reviewing this policy for ongoing suitability.

3. Responsibilities

- **Executive management** is accountable for EHS compliance, for providing the resources needed to meet this policy, and for designating an EHS Owner.
- **The EHS Owner**, the Supply Chain Manager, maintains this policy and supporting processes, monitors applicable legal requirements, and coordinates supplier EHS verification.
- **Employees** are responsible for following EHS procedures, working safely, and reporting hazards, incidents, or near-misses promptly.

Detailed responsibilities by role are set out in EHS-RR-001, EHS Roles & Responsibilities.

4. Workplace Health and Safety

Infraeo maintains a safe office and engineering environment, including reasonable measures for emergency preparedness (evacuation, first aid), safe use of equipment, ergonomic awareness, and prompt reporting and

investigation of incidents. Hazards and incidents are recorded and corrective actions tracked to closure. Engagement practices are set out in EHS-ENG-001.

5. Environmental Responsibility

Infraeo manages the environmental aspects of its office operations, including responsible energy use, waste minimization and recycling, and proper disposal of electronic waste in accordance with applicable regulations.

6. Supply Chain EHS

Physical manufacturing is performed by Infraeo's JDM manufacturing partner, who is responsible for occupational health and safety and environmental compliance at the point of manufacture. Infraeo requires its manufacturing partner to maintain certified quality, environmental, and occupational health and safety management systems. The current JDM manufacturing partner holds ISO 9001, ISO 14001, ISO 27001, ISO 45001 and ISO 50001 certification. These EHS obligations are defined in Infraeo's manufacturing agreement and in the Supplier EHS & Product Compliance Addendum (SUP-ADD-001), and are verified through Infraeo's supplier qualification process (SQ-PRO-001).

7. Product Quality and Compliance

Quality at the point of manufacture is managed under the JDM manufacturing partner's ISO 9001 certified quality management system. Because Infraeo's products are jointly designed, Infraeo co-owns product-level quality and regulatory compliance — including applicable RoHS and REACH requirements — which it manages through its design controls together with supplier compliance documentation, to support the delivery of quality products and services.

8. Communication and Review

This policy is communicated to all employees and made available to customers and partners on request. It is reviewed at least annually, or upon significant change to Infraeo's operations or applicable requirements. Review is recorded in the Management Review Record.

Revision History

Version	Change	Prepared by	Effective date
1.0	First issue	Supply Chain Manager	8/28/2023
2.0	Periodic review. Partner certifications stated affirmatively and EHS Owner identified; references to SUP-ADD-001 and SQ-PRO-001 added; approval moved to executive management.	Supply Chain Manager	5/4/2026