

Infraeo Code of Conduct

Document No.: COC-001 | Version: 2.0 | Effective Date: 7/7/2025 | Owner: Sales Operation Director

1. Introduction and Scope

This Code of Conduct outlines the principles, standards, and expectations that guide behavior and decision-making at Infraeo Inc. It applies to all employees, contractors, and representatives of Infraeo, and Infraeo requires equivalent standards of its manufacturing and supply partners.

This Code is aligned with the Responsible Business Alliance (RBA) Code of Conduct, the electronics industry standard covering labor, health and safety, environment, ethics, and management systems. Alignment does not denote RBA membership or third-party audit unless separately stated.

2. Integrity and Ethics

Employees must act with honesty and integrity in all business dealings. Infraeo expects compliance with all applicable laws and regulations in every jurisdiction in which it operates and in which its products are made and sold.

3. Labor and Human Rights

Infraeo is committed to upholding the human rights of workers and to treating them with dignity and respect. Infraeo and its partners shall observe the following:

- **Freely chosen employment** — no forced, bonded, indentured or involuntary prison labor; employment is voluntary and workers are free to leave upon reasonable notice. Workers shall not be required to pay recruitment fees, and employers shall not hold or destroy government-issued identification documents.
- **No child labor** — no employment of persons under the applicable minimum working age; documented age verification at hiring; workers under 18 shall not perform work that jeopardizes their health or safety.
- **Working hours and rest days** — working hours shall not exceed the limits set by applicable law, workers shall be allowed at least one day off in seven, and overtime shall be voluntary.
- **Wages and benefits** — wages shall meet applicable legal requirements for minimum wage, overtime and legally mandated benefits, shall be paid on time, and shall be documented in a clear wage statement. Deductions as a disciplinary measure are not permitted.
- **Humane treatment** — no harsh or inhumane treatment, harassment, sexual harassment, abuse, corporal punishment, mental or physical coercion, or verbal abuse, and no threat of any such treatment.
- **Non-discrimination** — no discrimination in hiring or employment on the basis of race, color, age, sex, sexual orientation, gender identity, ethnicity, national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, or marital status.
- **Freedom of association** — workers' rights to associate freely, join or refrain from joining organizations, seek representation and bargain collectively shall be respected in accordance with applicable law.

4. Respect in the Workplace

Infraeo is committed to maintaining a work environment free of harassment, discrimination and retaliation. All individuals shall be treated with respect and dignity.

5. Health and Safety

Infraeo is committed to providing a safe and healthy workplace. Employees are expected to follow safety policies and to report hazards and incidents promptly. Infraeo requires its manufacturing partners to control occupational hazards, maintain emergency preparedness, investigate incidents, and manage industrial hygiene and physically demanding work in accordance with applicable law and their management systems.

6. Environmental Responsibility

Infraeo is committed to minimizing the environmental impact of its operations and requires its manufacturing partners to hold and maintain required environmental permits, to manage hazardous substances, waste, wastewater and air emissions in accordance with applicable law, and to ensure products meet applicable material-content restrictions including RoHS and REACH.

7. Anti-Corruption and Bribery

Infraeo prohibits all forms of bribery, corruption, extortion and embezzlement. Employees must not offer, promise, give, solicit or receive anything of value to improperly influence a decision, whether directly or through an intermediary, and whether involving government officials or private parties. This includes compliance with the US Foreign Corrupt Practices Act and applicable anti-corruption law. Gifts, hospitality and entertainment must be reasonable, transparent and never intended to obtain an improper advantage. Business records shall be accurate and shall not disguise the nature of any payment.

8. Fair Business, Advertising and Competition

Infraeo upholds standards of fair business, advertising and competition, and does not obtain competitive information by improper means.

9. Confidentiality, Data Protection and Intellectual Property

Employees must protect sensitive company, employee, customer and supplier information. Unauthorized disclosure or misuse of confidential data is strictly prohibited. Infraeo respects the intellectual property rights of others, protects its own and its customers' intellectual property, and safeguards personal information in accordance with applicable privacy law.

10. Trade Controls

Infraeo complies with applicable export control, import and economic sanctions laws governing the transfer of products, software and technology.

11. Responsible Minerals Sourcing

Infraeo is committed to the responsible sourcing of minerals and does not knowingly source tin, tantalum, tungsten, gold or other covered minerals that finance or benefit armed groups in conflict-affected and high-risk areas. Due diligence is exercised in accordance with Infraeo's Conflict Minerals Policy (CM-POL-001).

12. Conflicts of Interest

Employees should avoid situations where personal interests could conflict with Infraeo's interests. Any potential conflict must be disclosed to management.

13. Use of Company Assets

Company resources, including equipment and digital tools, must be used responsibly and primarily for business purposes.

14. Reporting Concerns and Non-Retaliation

Employees, contractors and partner workers are encouraged to report any suspected violation of this Code. Reports may be made confidentially and, where permitted, anonymously, and without fear of retaliation. Retaliation against anyone who reports in good faith or participates in an investigation is itself a violation of this Code. Concerns may be raised at legal@infraeo.com, or in writing to the designated contact at the address above. Reporting channels and handling are set out in Infraeo's Reporting Concerns Procedure (COC-RPT-001), available on request.

15. Supplier and Partner Expectations

Infraeo requires its manufacturing and supply partners to conform to this Code and to the RBA Code of Conduct, to maintain an equivalent worker grievance and non-retaliation mechanism, and to flow equivalent requirements to their own suppliers, subcontractors, outsourced production partners and labor agencies. These requirements are made contractual through the Supplier EHS & Product Compliance Addendum (SUP-ADD-001) and are assessed through Infraeo's supplier qualification process (SQ-PRO-001).

16. Compliance and Accountability

Executive management is accountable for this Code. All employees are responsible for understanding and complying with it. Deficiencies are addressed through corrective action including root cause analysis and preventive measures, tracked to closure. Violations may result in disciplinary action, up to and including termination of employment.

17. Communication, Training and Review

This Code is communicated to all employees, who receive a business ethics briefing at onboarding and at least annually, with signed acknowledgments retained as the training record. This Code is reviewed at least annually, or upon significant change in law, regulation or company operations, and is updated as necessary.

Revision History

Version	Change	Prepared by	Effective date
1.0	First issue	Sales Operation Director	7/28/2023
2.0	Aligned with the RBA Code of Conduct. Added labor and human rights, environmental responsibility, fair business and competition, trade controls, responsible minerals sourcing and supplier expectations; expanded anti-corruption, confidentiality and reporting; annual review cycle.	Sales Operation Director	7/7/2025

Alignment with the RBA Code of Conduct does not denote RBA membership or third-party audit unless separately stated.