

Corporate Responsibility

Infraeo designs and supplies high-speed copper cable assemblies and transceiver products from Round Rock, Texas. Physical manufacturing is performed by our manufacturing partner.

This page sets out how we govern our business conduct and what we require of that partner and our wider supply chain.

Accountability

Executive management is accountable for our business conduct, environmental performance, and health and safety.

Executive management approves our policies, appoints an owner to maintain each one, and reviews performance and improvement opportunities at a management review held at least annually. Open corrective actions are reported at that review and tracked to closure.

Ethics and anti-corruption

Our Code of Conduct is aligned with the Responsible Business Alliance (RBA) Code of Conduct.

It prohibits bribery, corruption, extortion and embezzlement — direct or through an intermediary — consistent with the U.S. Foreign Corrupt Practices Act and applicable anti-corruption law. It also covers conflicts of interest, fair business and competition, protection of intellectual property, confidentiality and privacy, and compliance with trade and export-control law.

We maintain an ethics training briefing covering how to prevent and detect corruption, to be delivered at onboarding and at least annually, with signed acknowledgments retained.

Labor and human rights

We uphold the human rights of workers, and we require the same of our manufacturing and supply partners:

- Freely chosen employment — no forced labor, no worker-paid recruitment fees
 - No child labor, with documented age verification
 - Working hours and rest days consistent with applicable law, with overtime voluntary
 - Wages and benefits meeting applicable law
 - Humane treatment and non-discrimination
 - Freedom of association as permitted by law
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Health, safety and environment

We maintain a documented Environmental, Health & Safety Policy covering our own office and engineering operations, with defined roles and responsibilities and engagement practices that include near-miss and hazard reporting without reprisal.

At the point of manufacture, occupational health and safety and environmental compliance are the responsibility of our manufacturing partner, which holds independently certified management systems. Certification status is verified through our supplier qualification process.

Responsible minerals

Our Conflict Minerals Policy covers the responsible sourcing of tin, tantalum, tungsten and gold. Due diligence is aligned to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and to the Responsible Minerals Initiative.

We collect Conflict Minerals Reporting Templates from our manufacturing partner.

Product material compliance

We require that products supplied to us meet applicable material-content requirements, including the EU RoHS Directive and REACH, and we collect supporting material declarations from our manufacturing and component suppliers.

What we require of our supply chain

Our requirements are contractual, through our Code of Conduct and a Supplier EHS & Product Compliance Addendum covering management systems, labor and ethics, product compliance, sub-tier flow-down, verification and corrective action.

Conformance is assessed through a documented supplier qualification procedure and through periodic monitoring and re-qualification.

Raising a concern

Anyone — employee, contractor, partner, or partner worker — can raise a concern about ethics, labor, health and safety, or environmental practices.

Reports may be made confidentially and, where permitted, anonymously. Retaliation against anyone who reports in good faith is prohibited.

Email: legal@infraeo.com

Post: Designated Contact, Infraeo Inc., 101 E Old Settlers Blvd., STE 160, Round Rock, TX 78664

Objectives and reporting

We set objectives across labor, health and safety, and the environment. Each one, with its indicator and target, is set out on our [objectives and performance](#) page.

We track performance against them at least annually, following our management review. The first reporting period is calendar year 2026. Figures are reported in aggregate and never identify individual workers; where a figure is small enough to identify an individual, we report that fact instead. Where a target is not met, we identify the shortfall and the action taken.

Our policies

[Code of Conduct](#) (PDF)

[Environmental, Health & Safety Policy](#) (PDF)

[Conflict Minerals Policy](#) (PDF)

Our Reporting Concerns Procedure is available on request at legal@infraeo.com.

This page is reviewed at least annually and updated as necessary. Alignment with the RBA Code of Conduct and the OECD Due Diligence Guidance does not denote membership or third-party certification unless separately stated.

Last updated: August 2026.