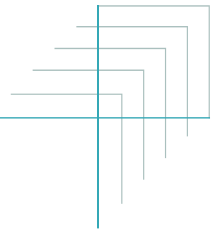


SMART GLOBAL HOLDINGS, INC.
GLOBAL PROCUREMENT POLICY
CONFLICT MINERALS
Adopted August 7, 2019

SMART Global Holdings (“SGH”) is committed to the highest standards of ethical conduct and full compliance with all applicable national and international laws. SGH strives to increase internal controls and create due diligence measures regarding the source and chain of custody of conflict minerals (cassiterite, columbite-tantalite, gold and wolframite and their derivatives, tin, tantalum, tungsten and cobalt) (hereinafter all referred to as, “Conflict Minerals”) throughout its supply chain. SGH is concerned with the potential that the mining and trade of Conflict Minerals from the eastern provinces of the Democratic Republic of the Congo (DRC) and the adjoining countries where revenues may be financing military conflict, related human rights violations and environmental degradation. SGH strives to discourage the use of Conflict Minerals in its manufactured products and its manufacturing process. Suppliers shall evaluate the origin or source of their materials throughout their supply chains to verify whether they have been obtained from the Democratic Republic of Congo and discourage the use of minerals sourced from the DRC. SGH supports seeking a sustainable solution to the issue of Conflict Minerals and the mining sector to improve both the traceability of minerals and the transparency of global supply chains.

Supplier Expectations:

1. SGH expects its suppliers to source materials from socially responsible suppliers.
2. SGH expects all its suppliers to follow the GeSI guidelines and provide all required identification regarding their source and chain of custody.
3. SGH expects its suppliers to pass on this requirement to their supply chain if they don’t source directly from smelters with regard to source and chain of custody.
4. Suppliers who are non-compliant to these requirements shall be reviewed for future business and may not be invited to bid on new business or retain current business.



5. SGH maintains a mechanism to enable the reporting of any customer facing questions related to Conflict Minerals and other supply chain matters.

For any questions or concerns about SGH Global's Conflict Minerals program, please contact us at conflictminerals@sghcorp.com.