**SMART GLOBAL HOLDINGS, INC.****UK MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT****AND CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT STATEMENT****2022**

This statement explains the steps that SMART Global Holdings, Inc. and its subsidiaries (together “**SGH**” or “**Group**”) have taken to prevent, detect and respond to slavery in our businesses and throughout our supply chain (the “**Statement**”). The Statement has been prepared pursuant to the Modern Slavery Act 2015, as amended (the “**Act**”), and the California Transparency in Supply Chains Act of 2010, and covers the period of 12 months ending on August 27, 2021.

**Foreword from Anne Kuykendall, Chief Compliance Officer at SMART Global Holdings, Inc.**

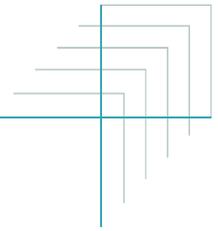
*“At SGH we are committed to high ethical standards and respecting human rights. We aim to ensure that these standards are upheld throughout our organization through actions intended to eradicate the risk of modern slavery and human trafficking within our businesses and supply chains.*

*We are committed to ensuring transparency in our own businesses and in our approach to eliminating modern slavery throughout our supply chain, consistent with the obligations of the Act. Our philosophy is reflected in the Responsible Business Alliance Code of Conduct that we have adopted and our labor and ethics policies, where we express our commitment that our directors, officers and employees must do more than be compliant with laws, regulations and policies relating to modern slavery: we must work according to our ethical principles and endeavor to conduct ourselves in a manner beyond reproach.*

*We expect the same high standards from all of our business partners, suppliers and contractors, and we expect our suppliers to hold their own suppliers to those high standards as well.”*

**Our Organization's Structure**

Since our inception over 30 years ago, SGH has grown into a diversified group of businesses focused on the design and manufacture of specialty solutions for the computing, memory and LED markets. Our



success is based on a customer-focused approach characterized by a commitment to quality, advanced technical expertise, quick time-to-market, build-to-order flexibility and excellence in customer service.

SMART Global Holdings, Inc. is parent company of the Group, with our corporate headquarters in Milpitas, California. The Group has over 3,900 employees worldwide and operates in numerous countries across the world. The Group, as of 27 August 2021, had a global annual turnover of approximately USD \$1.5 billion.

### **Our Business**

Our business is organized into three business units:

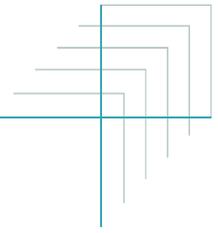
- Memory Solutions, which provides high performance and reliable memory solutions through the design, development and advanced packaging of leading-edge to extended lifecycle products;
- Intelligent Platforms Solutions, which offers specialized platform solutions for high-performance computing, artificial intelligence, machine learning and advanced modeling for technology research as well as solutions for embedded and wireless applications, specializing in high-reliability products; and
- LED Solutions, which offers a broad portfolio of application-optimized LEDs.

### **Our Supply Chains**

Our businesses rely on other businesses from which we purchase goods and services. Likewise, those businesses have suppliers which form our extended supply chain.

### **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our businesses. We have undertaken an assessment of the risks of slavery or human trafficking and reviewed our existing business policies and procedures to ensure that the preventive measures are appropriate and proportionate to the level of risk. SGH is a member of the Responsible Business Alliance (“RBA”) and, as such, SGH has adopted the RBA Code of Conduct. The RBA Code of Conduct, as well as our Code of Business Conduct and Ethics and our Supplier Code of Conduct (discussed below), reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not occurring in our supply chains.



In particular, SGH's labor and ethics policies articulate our commitment in adhering to the requirements specified by the RBA, including freely chosen employment, prohibition against child labor, reasonable working hours, fair wages and benefits, humane treatment, non-discrimination, freedom of association, business integrity, and privacy protection, all of which are important in creating and sustaining a positive and productive work environment.

### *Supplier Code of Conduct*

Our Supplier Code of Conduct details expectations for suppliers to engage in ethical business practices and remain in compliance with applicable laws and regulations. We require all suppliers to sign our Supplier Code of Conduct annually to mitigate human rights violations.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have conducted risk assessments both within our businesses and in relation to our suppliers. These assessments enable us to identify where there are risks of modern slavery and to target those risks throughout our work. We work with experts to ensure that our procedures react to, and mitigate, modern slavery risks.

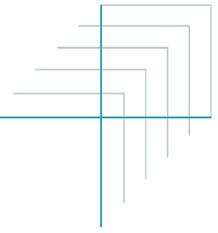
While we do not presently audit our suppliers in compliance with RBA Validated Audit Process (VAP) or equivalent guidelines, 80% of SGH's annual global supply chain spend is with RBA members whose facilities, in compliance with RBA rules, must be audited by the organization in compliance with VAP procedures.

SGH's diverse group of suppliers co-operate in quality, environmental, health, safety, labor and ethics consciousness to help improve mutual business growth. Since 2013, SGH has included RBA requirements as part of its supplier assessments.

Additionally, we have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

We have also implemented a global hotline which is available to callers on a confidential, anonymous basis. Our employees, and those of our suppliers, may report suspected issues around modern slavery via



the whistle-blower hotline. SGH maintains a strict non-retaliation policy, which allows employees and others to report with assurance that they will not risk reprisal.

### **Supplier adherence to our values and ethics**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance program, pursuant to which we require all of our suppliers to sign our Supplier Code of Conduct.

With respect to compliance, we take a holistic approach in which the following departments are involved:

- Legal
- Quality
- Internal audit
- Human resources
- Procurement

### **Training**

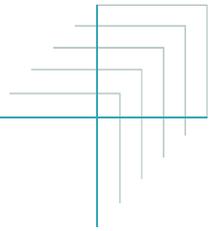
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our businesses, and how to mitigate those risks, we provide training to our staff on an annual basis. This provides all SGH employees the opportunity to review the comprehensive guidelines on preventing modern slavery encompassed in the RBA Code of Conduct.

SGH has also conducted supplier forums to communicate SGH's initiative towards ethics, RBA compliance and its commitment to the non-existence of modern slavery whereby suppliers were trained and communicated on ethics and RBA requirements.

### **Certification**

We are a member of and follow guidance from RBA's Responsible Mining Initiative (RMI) to ensure we are up-to-date with industry best practices to address the responsible sourcing of minerals in our supply chain. In line with the RMI, and to mitigate sourcing risks, we require all of our suppliers to complete the Conflict Minerals Reporting Template (CMRT) annually. We also provide information about mica and cobalt upon customer request.

### **Further steps**



Following a review of the effectiveness of the steps we have taken thus far to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Regularly audit our suppliers in compliance with RBA Validated Audit Process (VAP) or equivalent guidelines; and
- Screen potential suppliers for RBA membership.

**Concluding Statement**

Ethical behavior is at the heart of our business. We do not use persons held in modern day slavery, nor accept the use of them by any of our suppliers. This includes people who have been trafficked, forced into labor, bonded into labor and those people held in servitude through financial control or control of their freedom of movement.

This Statement is made pursuant to section 54(1) of the Act and has been approved by the board of SMART Global Holdings, Inc. and the board of SMART Modular Technologies (Europe) Limited and constitutes SMART’s slavery and human trafficking statement for the financial year ending August 27, 2021.

  
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Mark Adams, Director for and on behalf of  
SMART GLOBAL HOLDINGS, INC.

Date: **June 28, 2022**