



SMART MODULAR TECHNOLOGIES (EUROPE) LIMITED MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2020

This statement is made for and on behalf of SMART Modular Technologies (Europe) Limited pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes the company’s Slavery and Human Trafficking Statement (“Statement”) for the financial year ending 30 August 2019.

SMART Modular Technologies (Europe) Limited is a subsidiary of SMART Global Holdings, Inc. References in this Statement to “SMART”, “we”, “us”, “our” refer to SMART Global Holdings, Inc. and its subsidiaries. SMART companies are leaders in specialty memory and specialty compute and storage solutions serving the industry for over 30 years. Focused on providing extensive customer-specific design capabilities, technical support and value-added services, the SMART companies collaborate closely with their global customers throughout their design process and across multiple projects to create memory, compute and storage solutions for demanding applications with differentiated requirements.

We are committed to preventing slavery or human trafficking in every aspect of our business and our supply chain. 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.

SMART is a member of the Responsible Business Alliance (RBA) and, as such SMART has adopted the RBA Code of Conduct. SMART strives to achieve the highest standards of professional behavior across a range of practices, including labor, health and safety, environmental practices, ethics and management systems. In particular, SMART’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. SMART’s annual training provides opportunity for all employees to review the comprehensive guidelines on preventing modern slavery

encompassed in the RBA Code of Conduct. In line with these requirements, SMART conducts internal audits to ensure its processes and practices follow the RBA requirements as well as labor and ethics policy.

As a leader in the memory, compute and storage systems and subsystems industries, SMART has a global network of components, subsystems and raw materials suppliers. Every year, SMART conducts supplier audits to ensure goods and services supplied are in line with the management system. SMART's diverse group of suppliers co-operate in quality, environmental, health, safety, labor and ethics consciousness to help improve mutual business growth. SMART has conducted supplier forums to communicate SMART's initiative towards ethics and RBA compliance whereby suppliers were trained and communicated on ethics and RBA requirements. Starting in 2013, SMART included RBA requirements as part of the supplier assessment.

This Statement has been approved by the board of SMART Global Holdings, Inc. and the board of SMART Modular Technologies (Europe) Limited and complies with the requirements set out in section 54 of the UK Modern Slavery Act 2015.

Bruce Goldberg

Bruce Goldberg
Director
SMART Modular Technologies (Europe) Ltd.