

## 1. Overview

For SMART Global Holdings, Inc. (SGH), respect for human is integral to the Core Values we hold and in affects how we conduct business. We interact with stakeholders with this as our guide. We recognize there are potential and actual human rights issues and labor risks that occur within the supply chain. Most affected by these issues are those most vulnerable our society. We are committed to protecting and preserving human rights and promoting human rights awareness.

## 2. Policy Statement

SGH human rights and workforce labor rights policy is intended to protect human rights and provide each individual the dignity, respect, and acceptance the individual deserves. This Policy is a statement of our expectations with respect to human rights and labor practices and the standard of conduct we set for our employees and suppliers worldwide. This Policy is reflected in our operational procedures and applied indiscriminately, regardless of geographic region or location. Violations of this, or other policies of SGH, should be reported immediately and directly to management, or anonymously through our hotline services.

Our Policy is based on our Core Values of Integrity, Trust, Respect, Teamwork, Purpose Driven, Customer Focused and Accountability. It is modeled after the [Responsible Business Alliance \(RBA\)](#) Code of Conduct, which establishes standards for working conditions in the electronics industry or industries in which electronics is a key component. The standards established by the RBA are for the safety of the workers in the supply chains, that workers are treated with respect and dignity. Additionally, RBA standards require business operations to be environmentally responsible and ethically conducted. In turn, The RBA Code of Conduct is in alignment with the UN Guiding Principles on Business and Human Rights. The RBA Code of Conduct is based on international principles and norms we accept and incorporate in our business practices. Included in these principles are the United Nations (UN) Universal Declaration of Human Rights, the International Labor Organization's (ILO) International Labor Standards and Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN General Comment No. 15 on the right to water, and ISO standards.

## 3. Employment and Labor Practices

It is the Company's policy to provide equal employment opportunity for all applicants and employees. The Company does not unlawfully discriminate on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), gender identity, gender expression, political affiliation, national origin, ancestry, citizenship, age, physical or mental disability, legally protected medical condition, family care status, military or veteran status, marital status, domestic partner status, sexual orientation, genetic information, or any other basis protected by local, state, or federal laws. When necessary, the Company also makes reasonable accommodations for disabled employees and for pregnant employees who request an accommodation, with the advice of their health care providers, for pregnancy, childbirth, or related medical conditions.

The Company prohibits sexual harassment and the harassment of any individual on any of the other bases listed above. For information about the types of conduct that constitute impermissible harassment and the Company's internal procedures for addressing complaints of harassment, please refer to the Company's Policy Against Harassment below.

This policy applies to all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, disciplinary action, and social and recreational programs. The law prohibits managers, employees and third parties that an employee comes into contact with, from engaging in conduct that is prohibited by law. It is the responsibility of every manager and employee to follow this policy. Any employee having any questions regarding this policy should discuss them with Human Resources.

#### **4. Workplace Safety**

Every employee is responsible for working safely, both for self-protection and for the protection of fellow workers, and for supporting the Company's safety efforts. All employees are required to be familiar with and comply with the Company's rules governing safety, and to follow safe work practices at all times. Employees may be subject to discipline for engaging in any unsafe work practice or for violating established safety rules. Employees must promptly report any potential health or safety hazards, and all injuries or accidents to their manager and/or Human Resources. In the case of a serious threat to an employee's health, medical attention should be obtained immediately. In compliance with California law, and to promote the concept of a safe workplace, the Company maintains an Injury and Illness Prevention Program.

The security of our facilities as well as the welfare of our employees requires that we use our best efforts to maintain a secure workplace. All visitors to the Newark Headquarters are required to sign in at one of the lobby reception desks. Be aware of persons loitering in and around company premises for no apparent reason. Report any suspicious person or activities to the front desk receptionist or a member of our Security or Facilities teams. Secure your desk at the end of the day, and do not leave valuables or personal articles in or around your work area that may be accessible. Lost or stolen badges should be immediately reported to our Security team, SMART is not responsible for loss or damage to any personal property on Company premises.

The Company is committed to providing a safe, violence-free workplace. In this regard, the Company strictly prohibits employees, consultants, customers, visitors, or anyone else on Company premises or engaging in a Company-related activity from behaving in a violent or threatening manner. Moreover, the Company seeks to prevent workplace violence before it begins and reserves the right to address certain behaviors, even in the absence of violent behavior.

The Company believes that prevention of workplace violence begins with recognition and awareness of potential early warning signs and has established procedures within Human Resources for responding to any situation that presents the possibility of violence

## **5. Supplier Responsibility and Accountability**

In addition to complying with the applicable laws and regulations, we expect our suppliers to also either comply with the RBA Code of Conduct or align their business practices with RBA Code of Conduct, especially in areas relating to human rights, labor and employment, environmental, health and safety as well as ethics. We conduct periodic business reviews of our critical suppliers to ensure that they provide products and services in a manner that meet our business requirements, including taking prompt corrective actions and implementing preventive actions upon findings of violations. Where appropriate, we support our suppliers in improving their performance in areas that may affect SGH. We hold ourselves, and our suppliers, accountable to high standards, while focusing on continuous improvement.

## **6. SILENT ALERT (WHISTLEBLOWER HOTLINE)**

SMART provides a system that allows employees to report (on an anonymous basis) all reasonable concerns that they may have regarding our accounting and auditing practices as well as potential legal and ethical violations. At SMART, this Silent Alert system is accessible in two different ways:

By web interface at: <https://smartm.alertline.com/gcs/welcome>

By phone at: (877) 874-8416

All information received through the Silent Alert system will be forwarded to Human Resources, the Legal Department and our Audit Committee. This team will investigate each matter and take appropriate action.

Employees are encouraged to discuss any workplace issues they have with their immediate managers. Managers are responsible for providing a safe environment for employees to express their concerns. We have an “Open Door” perspective with all employees and encourage their feedback directly to their managers, Human Resources department or through the silent alert system, if all other channels are exhausted and the employee has not received a satisfactory closure to the concerns raised. SGH will not tolerate any retribution or retaliation against an employee who reports a compliance, harassment, illegal or unethical issue in good faith.

## **7. Oversight**

SGH has established an executive team to assess the risks in our supply chain on a regular basis. This assessment reflects the UN Guiding Principles on Business and Human Rights, in particular the Guiding Principle 17, and includes any potential or actual human rights related risks. The resulting assessment shows us how any potential or actual human rights abuses affect our operations and our ability to meet the needs and expectations of our stakeholders.