

Position Paper on Conflict Minerals

Date: December 03, 2018

Conflict Minerals – Declaration

Dear Customer,

The U.S. Dodd-Frank Act (Dodd-Frank Wall Street Reform and Consumer Protection Act) ¹ has been legally binding since July 2010. According to section 1502 of the Dodd-Frank Act, entities that are obliged to report on securities trading in accordance with U.S. law must annually disclose to the U.S. Securities and Exchange Commission (SEC) whether “conflict minerals” (tin, tantalum, tungsten and gold) that are necessary for the manufacture or function of their products originate from the Democratic Republic of the Congo or an adjoining country.

The provision of the U.S. Dodd-Frank Act that, according to section 1502, obliges any entity listed on a U.S. stock exchange not to use conflict minerals entered into force on May 31, 2014.

SMA Solar Technology AG (“SMA”) is not listed on a U.S. stock exchange and is therefore subject to no legal obligation, but it nonetheless expressly welcomes the Dodd-Frank Act and voluntarily commits to comply with it.

SMA itself imports no minerals and processes no such materials in its production process, but our devices contain components that might contain all four minerals named above. We therefore oblige our suppliers to disclose the origin of the minerals.

For this purpose, SMA uses the template developed by the Conflict-Free Sourcing Initiative in order to obtain information from suppliers and make this data available to customers.

We are conscious of our responsibility in the supply chain and work continuously, driven by our objectives within our sustainability strategy, to improve our product sustainability performance. In addition, SMA is already engaging with the EU’s legislative process for further-reaching provisions on conflict minerals, which will not enter into force until 2021.