

Data Protection Policy – Speak-Up Line

- General
- Use of the SMA Speak-Up Line
- What types of personal data and information will be collected and processed?
- How will personal data and information be processed after the report and who has access to it?
- Special country regulations

1. General

The SMA Speak-Up Line is a web and telephone-based offering from SMA Solar Technology AG to its employees, suppliers, customers and business partners to report the non-compliant behavior of SMA's employees, suppliers, customers and business partners. Reports can be submitted either over the telephone or through a website.

The SMA Speak-Up Line is provided by SMA Solar Technology AG, Sonnenallee 1, 34266 Niestetal, Germany. The web pages and phone service through which you may report an incident as well as the database in which the personal data and information that you report are stored, are operated by People Intouch B.V., Olympisch Stadion 41, 1076 Amsterdam, Netherlands ("People Intouch") on behalf of SMA Solar Technology AG.

2. Use of the SMA Speak-Up Line

The use of the SMA Speak-Up Line is voluntary. Please note, however, that we are able to receive and process reports only if you confirm that you have read and taken note of this Data Protection Policy and consent to the processing of the reports as described herein. We therefore kindly ask that you consent by ticking the box "I confirm that I have read and accepted the terms and conditions outlined within the Data Protection Policy." If you do not consent to the processing of the reports as described herein, the system will not allow you to file a report. In such a case, you will still be able to contact the SMA Group Compliance department directly.

Please note that the information you supply about yourself as well as SMA Group employees, suppliers, customers and business partners or any aspect in relation to SMA, may result in decisions that affect SMA employees and other third parties involved in the relevant incident. We therefore ask that you provide only information that is, to the best of your knowledge, accurate and complete. Complaints that are made to the best of your knowledge and not made in an intentionally false or grossly negligent way will not expose you to any consequences initiated by SMA Solar Technology AG. We guarantee that the information provided by you will be treated confidentially.

3. What types of personal data and information will be collected and processed?

If you report an incident through the SMA Speak-Up Line, we will collect the following personal data and information:

- your name, contact details and relationship to SMA if you provide such information,
- the name and other personal data of the persons you name in your report if you provide such information (e.g. description of functions, contact details),
- description of the misconduct as well as the circumstances of the incident, including the time and place of the incident, the affected SMA company, whether management has knowledge of the incident and whether you wish to file your report anonymously (please refer to the special regulations for selected countries under point 5).

4. How will personal data and information be processed after the report and who has access to it?

Any personal data and information that you report to us will be stored in the SMA Speak-Up Line database. The database is hosted and operated by People Intouch in the Netherlands. For the purpose of processing your report, to conduct investigations and if necessary to initiate sanctions, the personal data and information will be transferred from People Intouch to SMA Solar Technology AG in Germany. SMA Group Compliance will evaluate the information provided, conduct preliminary investigations if applicable and may initiate further investigations through SMA Corporate Internal Audit or other departments. If further steps are required during the investigation, the personal data and information may be accessed, processed and used by relevant SMA Solar Technology AG personnel, including Human Resources, Corporate Internal Audit and/or Corporate Legal & Compliance, as well as external consultants (e.g. legal advisors).

Personal data and information may also be disclosed to the police and/or other law enforcement or authorities.

The personal data you provided will be kept as long as it is necessary to process your report, or, if applicable, as long as it is necessary to initiate sanctions or if the data needs to be kept for legal reasons. Otherwise data will be deleted within three months after closing the report.

5. Special country regulations

Australia

According to Australian law, anonymous reporting is not recommended. If you would like to make a report, we ask that you please include your name. SMA Group Compliance ensures that any information you provide will be handled confidentially and responsibly.



France

Due to data protection regulations in France related to the SMA Speak-Up Line, a special application may be needed. As long as this application is pending, the SMA Speak-Up Line cannot be used in France. Please contact SMA Group Compliance.

Greece

Due to data protection regulations in Greece related to the SMA Speak-Up Line, a special application may be needed. As long as this application is pending, the SMA Speak-Up Line cannot be used in Greece. Please contact SMA Group Compliance.

Spain

Due to data protection regulations in Spain related to the SMA Speak-Up Line, a special application is needed. As long as this application is pending, the SMA Speak-Up Line cannot be used in Spain. Please contact SMA Group Compliance.