

## SODASTREAM INTERNATIONAL LTD.

### CONFLICT MINERAL POLICY

As adopted by the board of directors on July 27, 2017

**Background.** SodaStream International Ltd. and its group companies are committed to the highest standards of ethical and responsible business conduct. SodaStream is concerned that the trade of ‘Conflict Minerals’ (gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten) that are mined in the Democratic Republic of the Congo (“**DRC**”) and certain adjoining countries (together, the “Covered Countries”) may be funding human rights violations in the region. SodaStream is committed to sourcing components and materials from companies, including smelters and refiners that share our values regarding human rights, ethics and environmental responsibilities.

In 2012, the U.S. Securities and Exchange Commission (“**SEC**”) adopted rules (the “**Rules**”) implementing the conflict minerals provisions of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which require public companies to report annually to the SEC and disclose on their corporate websites whether any Conflict Minerals necessary to the functionality or production of their products are being sourced from the Covered Countries. We support efforts to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which, based on public reports, has been partially financed by the exploitation and trade of Conflict Minerals.

**Our Policy.** We support the Dodd-Frank Act’s goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. We are committed to responsible sourcing of materials and components for our products, including those containing Conflict Minerals, and we expect from our suppliers to be likewise committed to responsible sourcing. We also support greater transparency with regard to the supply chain, and in particular regarding the sourcing of Conflict Minerals. Accordingly we have adopted this Conflict Minerals Policy, and we expect that our suppliers will adopt a similar policy and meet our expectations set forth below.

**Our Commitment.** Though our supply chain is complex, and our manufacturing process is removed from the mining, smelting, and refining of Conflict Minerals, we are committed to working with our suppliers to source materials and components that are free from Conflict Minerals originating in the Covered Countries that may directly or indirectly finance or benefit armed groups that perpetrate serious human rights abuses in the Covered Countries. Specifically, we expect that all of our suppliers will partner with us to (i) provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the Rules and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that are ‘DRC conflict free’ (as defined in the Rules).

**Our Expectations of Suppliers.** SodaStream requires all of its suppliers of products that contain Conflict Minerals to conduct a reasonable country of origin investigation to identify the source of those Conflict Minerals, and if the source is from a Covered Country to confirm whether or not the producing mines and smelters have been certified by an independent auditor as ‘conflict free’.

We have the following expectations of our suppliers:

- Suppliers should not supply us with any products or other materials that directly or indirectly finance or benefit armed groups in the Covered Countries;
- Suppliers are expected to source Conflict Minerals only from sources that are identified as ‘DRC conflict free’;
- Suppliers should develop policies, procedures, due diligence processes and management systems that are reasonably designed to prevent products or materials that are not ‘DRC

conflict free' from entering our supply chain and to provide transparency as to the source of any Conflict Minerals;

- Suppliers are expected to take steps to identify the steps in the supply chain through which Conflict Minerals are introduced, and to undertake all due diligence efforts necessary to identify the smelter, refiner and/or mine from which Conflict Minerals originate, including requiring direct or indirect suppliers to our suppliers to cooperate in diligence efforts and to provide any information necessary to facilitate our compliance efforts with respect to the Rules; and
- Suppliers are encouraged to support industry efforts to enhance the traceability and responsible sourcing of Conflict Minerals.

In seeking to meet these expectations, our suppliers will be expected to:

- Implement and communicate policies that are consistent with this Conflict Minerals Policy, and require that their direct and indirect suppliers do the same;
- Establish procedures and contractual provisions that facilitate the traceability of Conflict Minerals within our supply chain and provide for the sourcing of 'DRC conflict free' products and materials under all circumstances;
- Provide us with timely and accurate information, at our request, regarding the source of Conflict Minerals in our supply chain and the steps that have been undertaken to determine whether such products and materials originated in the Covered Countries, including whether the source has been verified by a recognized, independent third party;
- Use reasonable efforts to source Conflict Minerals from smelters and refiners that have been validated by a recognized, independent third party as not having originated in the Covered Countries; and
- Advise us as promptly as possible of any determination that any products or materials in the supply chain originated in the Covered Countries.

We have established a system of controls to promote transparency over our conflict minerals supply chain. We annually send a letter and the Conflict Minerals Reporting Template (as described below), which is designed to facilitate the transfer of information through the supply chain regarding each mineral's country of origin and the smelters and refiners being utilized for the mineral. For that purpose, we provide all of our suppliers with the supply chain survey in the form of the most current version of the Conflict Minerals Reporting Template of the Electronic Industry Citizenship Coalition ("EICC"), which requires suppliers to make representations regarding (i) the country of origin of the Conflict Minerals contained in the components or products supplied to us, (ii) all of the smelters in the supplier's supply chain for such Conflict Minerals, (iii) whether such smelters have been validated as being in compliance with the Conflict-Free Sourcing Initiative's ("CFSI") Conflict Free Smelter Program ("CFSP"), (iv) whether the supplier has its own Conflict Minerals policy that requires its own direct suppliers to be "DRC conflict-free" and (v) whether the supplier collects Conflict Minerals surveys with its own suppliers to gather similar information. Our communications with our suppliers are stored electronically together with copies of our internal communications, which relate to our due diligence.

We evaluate our relationship with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this Conflict Minerals Policy. If we determine that a supplier's efforts are deficient, we reserve the right to take any appropriate action, including suspension or termination of our relationship with the supplier.

Nothing in this Conflict Minerals Policy is intended to in any way grant any additional rights or expectations to any of our suppliers, or in any way modify or otherwise limit our contractual or legal rights. We reserve the right to amend this Conflict Minerals Policy in response to changes in the disclosure obligations or other regulatory requirements to which we are subject.