

California Transparency in Supply Chains Act of 2010 (SB 657) & UK Modern Slavery Act of 2015

Financial year ending 31st December 2016

Kingston Technology Corporation, and its affiliated companies, (collectively referred to as “Kingston”) share the concern of our customers that the Kingston products they purchase be procured and manufactured through a supply chain that adheres to laws regarding slave labor or human trafficking. As such, Kingston takes measures to ensure that our direct supply chain for tangible goods offered for sale is in compliance with such applicable laws. In response to the California Transparency in Supply Chains Act of 2010 (SB 657) and the UK Modern Slavery Act of 2015, Kingston has taken the following actions:

Kingston engages in the verification of product supply chains to evaluate and address risks of human trafficking and slavery. Self assessment questionnaires are sent out to direct suppliers and responses are evaluated. Third party verifications are not conducted.

Kingston conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The audits are arranged and conducted by trained Kingston personnel. Third party/independent auditors are not used in this process.

Kingston sends our Supplier Code of Conduct and acknowledgment letters to direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which we are doing business.

Kingston maintains internal accountability standards and procedures for employees and contractors failing to meet company standards regarding slavery and trafficking.

Kingston employees and management who have direct responsibility for supply chain management receive training on the elements of SB 657 and the UK Modern Slavery Act of 2015.

Kingston is a member of the Electronic Industry Citizenship Coalition (EICC). The Kingston Code of Conduct is based on the EICC Code of Conduct which is a set of standards on social and ethical issues which prohibit the use of forced, bonded, and indentured labor and involuntary prison labor. As a member of EICC, Kingston is committed to progressively align its own operations with the provisions of the EICC Code of Conduct and to support and encourage its suppliers and sub-contractors to do the same. Kingston is committed to a continuous improvement approach to implement the EICC Code of Conduct in its operations and in the supply chain.