

# UK Modern Slavery Act

## Financial year ending 31 December 2021

Kingston Technology Corporation and its sites worldwide (herein collectively referred to as "Kingston") is a US-based company which develops memory products. As of June 2021, Kingston has sold the HyperX line of gaming peripherals. Kingston has global manufacturing sites and a worldwide market presence. As such, we are not only obligated, but committed to supporting human rights around the world. We do not tolerate any form of modern slavery which includes forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons by any Kingston supplier or for any other purpose.

Kingston's commitment to prohibit modern slavery is part of a larger effort of aligning Kingston's standards to our core values: encourage business integrity and ethical conduct, and supply chain transparency and accountability. We are committed to social and environmental responsibility and to making a strong and positive contribution to the societies and people served by the company and its employees. We are dedicated to delivering products through a business and supply chain that respects human rights and the dignity of labour, adhering to laws that prohibit modern slavery in Kingston's direct operations or supply chain.

## Structure, business and supply chain

Kingston is a leading manufacturer in DRAM and memory modules, and flash memory products such as SSDs, USBs, SD cards and readers. Kingston generates revenues primarily from sales of products, OEM services and contract manufacturing. Our efforts to combat modern slavery require us to be reliant on our strong relationships with our global suppliers that manufacture or provide services on our behalf.

Kingston works with many suppliers worldwide that support our business and operations, including hardware manufacturing and our extended workforce. As such, Kingston takes measures to ensure that our suppliers have established policies and practices to prevent modern slavery practices from developing in their supply chains.

## Internal management, accountability and programmes

Kingston's worldwide employees are dedicated to ensuring ethical practice, including labour and human rights, health and safety of employees and work practices, consideration of environmental impact and supporting our global communities. Kingston's top management, corporate executives and employees work together to prevent any form of modern slavery and continue to explore improvements within our internal programmes.

Kingston conducts annual CSR Risk Assessments to assess risk within our own processes and business transactions. The CSR Risk Assessment programme is developed around Kingston's Code of Conduct and RBA standards, as well as federal and local laws by country or region. Any CSR Risk Assessment findings will be addressed accordingly to ensure minimal risk in internal processes. Additionally, Kingston conducts annual CSR Risk Assessments to assess risk within our own processes and business transactions. The CSR Risk Assessment programme is developed around Kingston's Code of Conduct and RBA standards, as well as federal and local laws by country or region. Any CSR Risk Assessment findings will be addressed accordingly to ensure minimal risk in internal processes.

Kingston firmly believes that our responsibility to due diligence includes transparency. Our commitment to corporate social responsibility, including our efforts against modern slavery, can be found in our annual [Global Reporting Initiative \(GRI\) Report](#). The GRI Report provides detailed information about Kingston as an organisation through its financial and operational activities and is published on our website and accessible to the public. Transparently reporting through the GRI platform holds Kingston accountable and demonstrates Kingston's commitment to prevent modern slavery.

## **Policies addressing ethical conduct and prevention of modern slavery**

Kingston has a Code of Conduct that outlines expectations for Kingston employees and our suppliers alike. The Kingston Code of Conduct sets out policies intended to protect the health, safety and ethical treatment of workers, which prohibits any form of modern slavery. Kingston employees, contractors and suppliers are expected to abide by our Code of Conduct to maintain internal accountability standards and procedures for any parties failing to meet Kingston's company standards regarding modern slavery. Kingston maintains accountability and grievance mechanisms which are available to both employees and external parties. Kingston will investigate any reports of human trafficking and slavery in its business or supply chain and take appropriate action to remedy any issues it identifies as a result. No such reports have been received during the last financial year.

For additional information, please refer to the [Kingston Code of Conduct](#).

## **Kingston's commitments to mitigate modern slavery through due diligence and supplier management**

One of the ways Kingston has exercised its due diligence has been through our continued membership of the [Responsible Business Alliance](#) (RBA). As a member of the RBA, we are committed to aligning our policies and operations with the provisions of the [RBA Code of Conduct](#) and to supporting and encouraging our suppliers and sub-contractors to do the same. RBA membership requires, amongst other things, that members take a firm stance against modern slavery.

RBA membership includes not only Kingston's plausibility of being audited by other RBA participants, but the ability to request RBA audits of our suppliers. RBA audits are conducted to assess suppliers' policies and practices with regards to modern slavery risks and controls, their management and oversight of their own suppliers. RBA audits are completed by RBA-certified third-party entities.

Kingston Supplier Audits aid in the improvement of our supply chain's awareness and efforts to reduce risks of modern slavery. Supplier Audits are conducted by Kingston using RBA audit guidelines and follow the RBA's structure for corrective action and follow-up. Follow-up audits are conducted to address any corrective action and to help to keep suppliers accountable and ensure continual improvement in their operations to help combat modern slavery. Due to the ongoing health and safety concerns during COVID-19, Kingston was not able to conduct in-person Supplier Audits in 2021 as planned. In place of in-person Supplier Audits, online audits were conducted on a number of suppliers. We have developed an audit plan for 2022, which incorporates in-person supplier audits.

Additionally, Kingston requests suppliers to complete self-assessment questionnaires (SAQ) about their working conditions and CSR programme. SAQs allow us to identify labour-related red flags that may impact our decision to continue or alter a current relationship with a supplier.

Kingston has established and maintained a Conflict Minerals Programme as part of our commitment to help end modern slavery. Kingston is a member of the Responsible Minerals Initiative (RMI), which has a variety of programmes addressing modern slavery and child labour. Being a member of the RMI allows Kingston to manage and maintain a supply chain that does not harvest precious minerals (currently tin, tungsten, tantalum, gold and cobalt) from mines that finance modern slavery and child labour.

## Training

Kingston is continuing to develop and implement CSR training at each of its regional sites. This training includes Kingston's Code of Conduct, which reinforces the expectation that our employees, extended workforce and suppliers follow applicable laws and report concerns of illegal or unethical activity.

Senior management, corporate executives and employees who have direct responsibility for supply chain management at our major manufacturing facilities receive training on a regular basis on the elements of the UK Modern Slavery Act to help them identify warning signs of modern slavery within the supply chain. We are currently working to further refine this training programme to be applied across our global sites.

## Assessing and reporting on effectiveness

Kingston schedules RBA audits and conducts its own audits on suppliers and their facilities. These audits include in-depth facility tours, meetings with management, on-

site worker interviews, document reviews and assessments of related areas such as dormitories, cafeterias, wastewater treatment facilities and warehouses. The audit protocol is designed to assess suppliers' performance in areas covered by our Code of Conduct, including modern slavery risk.

As mentioned above, both RBA and Kingston audit findings are closely followed up on to ensure the effectiveness of corrective actions.

Kingston recognises the limitations of audits. As such, Kingston conducted a materiality assessment for the 2021 year to assess which material topics, based upon the United Nations Sustainable Developmental Goals, are important to our internal and external stakeholders. Results of the assessment done indicated the importance of the following topics:

1. Occupational health and safety
2. Employee wellbeing and working conditions
3. Business ethics

With the results of this assessment, Kingston plans to continually assess any areas of improvement within these topics in our operations as well as our suppliers. This is relative to, and consistent with, our commitment to prohibit modern slavery. Materiality assessments will be periodically conducted to ensure alignment with our internal and external stakeholders.

Additionally, Kingston sends our Code of Conduct and acknowledgment letters to direct suppliers to certify that materials incorporated into Kingston products comply with the laws regarding modern slavery of the country or countries in which they are doing business.

## Reporting concerns or raising issues related to modern slavery

Each of Kingston's regional sites has an active whistle-blower policy which offers reporting options to employees and extended workers. Reporting tools are made accessible in multiple languages as an option to report concerns anonymously, and are promoted through internal policies, communications and trainings. These tools are extended to suppliers alike through our Kingston's Code of Conduct. Our Code of Conduct also prohibits retaliation for raising concerns.

If any concerns about modern slavery are raised through our reporting channels, Kingston coordinates with appropriate stakeholders to investigate and address the issue. As previously noted, actions taken could potentially reduce or suspend business with the supplier, or terminate business with the supplier altogether. Any internal reports may result in appropriate disciplinary actions or termination of employment.

## Approvals

This UK Modern Slavery Statement was approved by the Vice President of Administration of Kingston Technology Company, Inc. and is endorsed by the Management Board of Kingston Technology Europe Co LLP and Kingston Digital Europe Co LLP.

This statement is made pursuant to the requirements of the UK Modern Slavery Act and also serves to fulfil the requirements of the California Transparency in Supply Chains Act (SB 657) and Australia Modern Slavery Act.

**Vice President of Administration**

A handwritten signature in black ink, appearing to read 'L. Gonzales', with a long horizontal stroke extending to the right.

**Lawrence Gonzales**

Dated: 28/6/2022