

Modern Slavery Statement

Financial Year ending 31st December 2024

Kingston Technology Company, Inc. and its sites worldwide (herein collectively referred to as "Kingston") is a US-based company which develops memory products. 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 labor, involuntary or exploitative prison labor, 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 labor, adhering to laws that prohibit modern slavery in Kingston's direct operations or supply chain.

Structure, business, and supply chain

Kingston is a leading global manufacturer of memory and storage solutions. With over 2800 employees, Kingston operates 18 regional offices around the world and are distributed in over 175 locations to serve an international network of distributors, resellers, retailers and OEM customers. Our customers include businesses of all sizes, tech consumers and a vast network of channel partners. We help supply top tier data centers, cloud providers and PC manufacturers as well as companies developing the next trends in smart devices. As part of our continued commitment to meet the evolving needs of our customers around the world, we also provide contract manufacturing and supply chain management services for our partners to deliver customized solutions for their needs. In total, Kingston produces more than seventeen million customized modules each month for our customers.

Kingston works with at least 150 suppliers worldwide that support our business and operations, including hardware manufacturing and our extended services. 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. Our efforts to combat modern slavery require us to be reliant on our strong relationships with our suppliers that manufacture and provide services on our behalf. The scope of our suppliers includes direct suppliers all the way up to the raw material level. Kingston's

current supplier audit priorities include direct suppliers, although we will continue to collect information across the supply chain.

Internal management, accountability, and programs

Kingston's worldwide employees are dedicated to ensuring ethical practice, including labor 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 programs.

Kingston conducts annual CSR Risk Assessments to assess risk within our own processes and business transactions. The CSR Risk Assessment program 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 [Sustainability Report](#). The Sustainability Report is based upon the GRI Standards and provides detailed information about Kingston as an organization through its operational activities. Transparently reporting 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 up policies intended to protect the health, safety and ethical treatment of workers, which prohibits any form of modern slavery. In addition to our employees, contractors and suppliers are also expected to abide by our Code of Conduct. To address any parties that fail to meet Kingston's expectations with respect to 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, see 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 with the [Responsible Business Alliance](#) (RBA). As a member of RBA, we are committed to aligning our policies and operations with the provisions of the [RBA Code of Conduct](#) and to support and encourage our suppliers and sub-contractors to do the same. RBA membership requires, among 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 by RBA-certified third-party entities to assess suppliers' policies and practices with regards to modern slavery risks and controls, their management, and oversight of their own suppliers.

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. In 2024, 8 supplier audits were conducted.

Additionally, Kingston requests suppliers to complete annual self-assessment questionnaires (SAQ) about their working conditions and CSR program. SAQs allow us to identify labor-related red flags that may impact our decision to continue or alter a current relationship with a supplier. In 2024, 240 supplier assessments were conducted based upon social criteria. These questionnaires include criteria such as location, goods/services provided, vulnerable working groups, and the stage of the supply chain.

Kingston has established and maintained a Conflict Minerals Program 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 programs addressing modern slavery and child labor. 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 labor. More information about Kingston's Conflict Minerals Program can be found in our annual [Responsible Minerals Report](#).

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.

Top 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 for modern slavery within the supply chain. We are currently working to further refine this training program to be applied across our global sites.

Assessing and Reporting on Effectiveness

Kingston schedules 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 effectiveness of corrective actions.

Reporting Concerns or Raising Issues Related to Modern Slavery

Each of Kingston's regional sites have 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 is promoted through internal policies, communications, and trainings. These tools are extended to suppliers alike through our Kingston 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 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 fulfill the requirements of The California Transparency in Supply Chains Act (SB 657) and Australia Modern Slavery Act.

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

Larry Gonzales
Vice President of Administration

Dated: 25 June 2025