

Kingston Technology GRI 2020

Organization Name: Kingston Technology

Sector: Technology Hardware

GRI 102: General Disclosures

Organizational profile

102-1: Name of the organization

Name of the organization

Kingston Technology Corporation

102-2: Activities, brands, products, and services

a. A description of the organization's activities

Kingston manufactures memory products that support nearly every device that uses memory, from computers, servers, routers and printers, to digital cameras and mobile phones. The company also provides contract manufacturing and supply chain management services for semiconductor manufacturers and system OEMs. Kingston also designs and owns the HyperX line of gaming peripherals including headsets, keyboards, mice, and microphones.

b. A description of the organization's activities

Primary Kingston brands, products, and services are as follows:

Kingston Technology Company, Inc. (Module)

Kingston Digital Inc. (Flash)

HyperX (Gaming Peripherals)

Kingston Technology Services (OEM, ODM, EMS Logistics)

Advanced Validation Labs (Testing Services).

To our knowledge, none of these products or services are banned in any market.

102-3: Location of headquarters

17600 Newhope St. Fountain Valley, CA 92708

102-4: Location of operations

Total number of countries:

5

Countries where it has significant operations:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

102-5: Ownership and legal form

Privately held corporation

102-6: Markets served

a. Markets served, including:

i. Geographic locations where products and services are offered.

U.S.

Canada

Latin America: Argentina, Brazil, Chile, Colombia, Costa Rica, Mexico, Peru

Europe: Belgium, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy,

Latvia, Netherlands, Norway, Poland, Portugal, Romania, Serbia, Spain, Sweden, Switzerland, United Kingdom

Kazakhstan

Russia

Turkey

Ukraine

Egypt

Saudi Arabia

South Africa

UAE

Asia-Pacific: Australia, China, India, Taiwan, Vietnam, Hong Kong, Japan

ii. sectors served

Computers

Technology Hardware

iii. types of customers and beneficiaries

End User/Individual Consumers/Home/Enthusiast (Retail)

OEM ODM Government Medical Science and Tech

102-7: Scale of the organization

a. Scale of the organization, including:

i. total number of employees

3342

ii. total number of operations

5

iii. net sales (for private sector organizations) or net revenues (for public sector organizations)

12800000000.0 USD

iv. total capitalization (for private sector organizations) broken down in terms of debt and equity

Debt	665000000.0 USD
Equity	3400000000.0 USD

v. quantity of products or services provided.

496000000

102-8: Information on employees and other workers

Total number of employees by employment contract (permanent and temporary), by gender

Gender	Permanent	Temporary
Male	1272	169
Female	1214	687
Total	2486	856

Total number of employees by employment contract (permanent and temporary), by region

Region name	Permanent	Temporary
Ireland	25	0
USA	713	86
Taiwan	1168	12
UK	256	8
China	324	750
Total	2486	856

Total number of employees by employment type (full-time and part-time), by gender

	Full-time	Part-time
Male	1375	4
Female	1869	8
Total	3244	12

Not applicable

N/A

The data has been compiled through reports, and no assumptions were made.

102-9: Supply chain

Kingston utilizes 250 suppliers to obtain components, manufacture, distribute, and package products. Approximately 42% of our suppliers provide packaging and casing. The remainder of the suppliers provide product components that are used in the manufacture and assembly of Kingston products. Most suppliers are located in Taiwan and China. Product component suppliers that have been audited to date by Kingston provide an indication that these suppliers are neutral on labor intensiveness. Packaging and casing suppliers tend to be more automated.

102-10: Significant changes to the organization and its supply chain

Significant changes to the organization's size, structure, ownership, or supply chain

i. There has been one change in the location of one of our suppliers. Otherwise, there have been no changes in the location of, or changes in, operations, including facility openings, closings, or expansions for the time period being reported.

ii. Being a privately held corporation, no changes have been made in capital structure or other capital formation, maintenance, or alteration of operations. Kingston remains a stably owned company.

iii. Kingston continually evaluates suppliers based upon proximity to operational centers, and quality, including human resources treatment, with regard to selection and termination. Very few suppliers have changed in the time period being reported, however, additional suppliers have been vetted to Kingston standards for product variation changes.

102-11: Precautionary Principle or approach

Precautionary Principle or approach

Kingston uses EHS systems approach (ISO14001, ISO45001, RBA, etc.) for risk management in operational planning, and is seeking to apply this technique for development and introduction of new products.

102-12: External initiatives

A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes, or which it endorses.

Kingston also complies with product environmental requirements, meeting these requirements before they were implemented (WEEE, ECHA, both by 2005). Lastly, Kingston is a proud member and supporter of the Responsible Business Alliance (RBA), which is applied globally.

NGOs such as ISO 14001 – investment into local and regional environment, environmental initiatives, ISO 45001 – investment into employees

102-13: Membership of associations

A list of the main memberships of industry or other associations, and national or international advocacy organizations.

Kingston is a proud member and supporter of the following organizations:

- JEDEC
- Compact Flash
- SD association
- PCI-SIG
- NVMe
- SATA-io
- USB-if
- RBA

Strategy

102-14: Statement from senior decision-maker

a. A statement from the most senior decision-maker of the organization (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy for addressing sustainability.

Full Name

David Sun

Role

Chief Operating Officer

Statement

As an industry leader, delivering quality products, Kingston values the tenets of respect, integrity, and loyalty to our employees and our business partners. As we continue to grow and expand our global footprint, we follow the guiding principle for our corporate social responsibility program to create, contribute, and cultivate a culture built for environmental and social impact. We strive to construct a sound framework of initiatives that enhance our responsible business practice and sustainability for our employees, as well as our business partners and customers.

102-15: Key impacts, risks, and opportunities

A description of key impacts, risks, and opportunities

Kingston has evaluated its risk with regard to environmental and social impacts that effect and present challenges from an economic standpoint. The three greatest risks Kingston has identified at this time are as follows:

Short-term (1-3 years): Drought conditions in Taiwan and the US continue to be issues that may impact our operating facilities in the short term. The use of water resources in operations has been a focus to Kingston in reducing and eliminating the need of water in the production process. This has a positive impact on the communities in which we operate by significantly reducing the use of a precious resource. To date, Kingston has nearly eliminated the use of water in these facilities in the production process and now only uses water for sanitary conditions for employees.

Mid-term (4-8 years): Air quality continues to be an issue in China. Kingston has focused on energy efficiency and the greater use of renewable energy sources to reduce it's carbon footprint in the area in which it operates. The impact from these initiatives contributes to the betterment of air quality for the community thus reducing health concerns for human resources Kingston employs.

Long-Term (9-30 years): Rising sea levels could potentially impact most operating locations for Kingston. Understanding this risk, Kingston continues to explore and implement reduction of climate change activities. For example, non-renewable energy reliance was identified as a risk. Kingston has embarked on solar panel installation and implementation at it's operating centers, starting with the USA.

Ethics and integrity

102-16: Values, principles, standards, and norms of behavior

A description of the organization's values, principles, standards, and norms of behavior.

Below are Kingston's Core Values, which set expectations for behavior in the workplace:

Respect for one another in our culturally diverse environment

Loyalty to our long-term partners

Integrity and Fairness in all aspects of our business

Flexibility and Adaptability in responding to our customers' needs

Investing in our Employees to continually improve our most valuable resource

Having Fun working in the company of friends

102-17: Mechanisms for advice and concerns about ethics

a. A description of internal and external mechanisms for:

i. seeking advice about ethical and lawful behavior, and organizational integrity;

Kingston's Legal and Human Resources departments are responsible for providing advice regarding ethical and lawful behavior. Independent Legal council and HR resources are consulted at all times regarding anything of this nature. Information is available to all employees upon hire through orientation, and continually through communications for the duration of employment. Other stakeholders are informed through periodic communication, audits, and access to mechanisms at Kingston's website: (<https://www.kingston.com/us/company/social-and-environmental-responsibility>).

Kingston has internal policies and procedures to respond confidentially to the nature of the issue that is brought forward. For example, an export issue regarding ethical or lawful behavior would be directed to the export team, then involve Legal and HR as needed. Regardless, all information would be kept confidential and Kingston's policies dictate non-retaliation clauses.

ii. reporting concerns about unethical or unlawful behavior, and organizational integrity.

Kingston maintains a 24/7 hotline for stakeholders to report any unethical or unlawful behavior, anonymously.

During the reporting period, Kingston has received no reports of misconduct.

Should a report be received, Kingston process involves Legal and HR as needed to investigate the allegation.

Such investigations are kept confidential on a need-to-know basis, per policy.

Governance

102-18: Governance structure

Governance structure of the organization

Our Executive Board decides the direction and vision of Kingston's business.

Committees responsible for decision-making on economic, environmental, and social topics

The Corporate Social Responsibility team, with the input of the Executive Board, is responsible for making decisions regarding economic, environmental, and social topics.

The Environmental Health and Safety Management Committee reports to the Vice President of Administration and works in conjunction with the Corporate Social Responsibility Team in developing related risks, targets, and on opportunities.

102-19: Delegating authority

Process for delegating authority for economic, environmental, and social topics

The Executive Board delegates authority to Corporate Social Responsibility Team to address economic, environmental, and social topics.

102-20: Executive-level responsibility for economic, environmental, and social topics

The organization has appointed an executive-level position or positions with responsibility for economic, environmental, and social topics.

Yes, appointed

Post holders report directly to the highest governance body.

Yes, direct report

102-21: Consulting stakeholders on economic, environmental, and social topics

Processes for consultation between stakeholders and the highest governance body on economic, environmental, and social topics.

Kingston uses a materiality assessment survey to consult stakeholders regarding economic, environmental, and social topics.

If consultation is delegated, describe to whom it is delegated and how the resulting feedback is provided to the highest governance body.

The Executive Committee has delegated to the Vice President of Administration, which utilizes the CSR management committee, and EHS management committee, to provide information to and obtain information from stakeholders and provide feedback for decision making.

102-22: Composition of the highest governance body and its committees

a. Composition of the highest governance body and its committees by:

i. Executive or non-executive;

Both, a combination of executive (Vice President of Administration) and non-executive (CSR and EHS Management Committees)

ii. Independence;

Independent of the executive committee, but reports through the Vice President of Administration to the Executive Board

iii. Tenure on the governance body;

Average of 3 to 5 years

iv. Number of each individual's other significant positions and commitments, and the nature of the commitments;

One individual responsible for administration functions for Kingston, not just CSR. All other members are responsible for CSR governance body functions.

v. Gender;

74% Female, 26% Male

vi. Membership of under-represented social groups;

Age group: under 30	29%
Age group: 30-50	48%
Age group: over 50	23%

vii. Competencies relating to economic, environmental, and social topics;

economic - very good; environmental - moderate; social - moderate

viii. Stakeholder representation

through CSR (i.e. community, environmental, etc.) and EHS Management Committee (i.e. employees)

102-23: Chair of the highest governance body

The chair of the highest governance body is also an executive officer in the organization

Yes, the chair is an executive officer

If the chair is also an executive officer, describe his or her function within the organization's management and the reasons for this arrangement.

Vice President of Administration is in direct communication with the C-suite on CSR and climate related issues, opportunities, and decision making. CSR management committee reports directly to the Vice President of Administration on risks, objectives, targets, and performance, on said targets. EHS management committee also reports to the Vice President of Administration and works in conjunction with the CSR Team in developing related risks, targets, and opportunities.

102-24: Nominating and selecting the highest governance body

Nomination and selection processes for the highest governance body and its committees.

Kingston is a privately held company, therefore, executives and their direct reports are selected for committee representation to the Executive Board, which hold authority for governance of the organization.

Criteria used for nominating and selecting highest governance body members

Kingston is a privately held company. When selecting governance body members, Kingston considers diversity, expertise, and experience relating to economic, environmental, and social topics. Because Kingston selects members from within the company, we do not include independence within consideration.

102-25: Conflicts of interest

Processes for the highest governance body to ensure conflicts of interest are avoided and managed.

Kingston has an Operational Compliance support team that works in conjunction with the Legal team to vet any new proposed product alterations, lines, equipment, and vendor/supplier relationships. The vetted information is shared with the executive board (highest governance body) through the Vice President of Administration, resulting in informed decisions that avoid conflicts of interest.

Whether conflicts of interest are disclosed to stakeholders

N/A, due to Kingston being a private company.

102-26: Role of highest governance body in setting purpose, values, and strategy

Role of highest governance body in setting purpose, values, and strategy

Kingston's Mission Statement is formulated by the Governance Body and Senior Executives. This sets up the values and purpose of the organization from which Kingston's policies and procedures are developed. The Vice President of Administration is responsible for ensuring the development and deployment of policies and procedures that are reflective of the organization's Mission Statement, except for Finance, which is handled by the Vice President of Finance and Controller. Department responsible teams roll out the policies and procedures for implementation. The ISO procedures set the framework for the company's strategy and policy with goals set and reviewed annually by the Senior Executives. The Mission Statement is signed by Vice President of Administration.

102-27: Collective knowledge of highest governance body

Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental, and social topics.

Kingston's executive board holds monthly meetings to discuss economic, environmental, and social topics, and receives updates from perspective departments. Additionally, Kingston also holds quarterly Management Reviews regarding CSR, EHS and ISO topics with the Vice President of Administration, and other applicable departments.

102-28: Evaluating the highest governance body's performance

Processes for evaluating the highest governance body's performance with respect to governance of economic, environmental, and social topics.

The processes used for evaluating the performance of the highest governance body includes internal audits, external audits from certified frameworks from third party auditors, and self-reporting disclosure mechanisms. These include ISO systems (45001/14001), Carbon Disclosure Project, and RBA VAP audits. Outcomes of these audits provide an indication of Kingston's governance body's performance and help set future direction.

Whether such evaluation is independent or not, and its frequency.

Evaluations, other than internal, are all independent, third-party evaluations. These occur on an annual and semi-annual basis depending upon the management system being evaluated.

The evaluation is a self-assessment.

No

Actions taken in response to evaluation of the highest governance body's performance

Kingston uses the CAR and risk assessment processes to change the organization's practices.

102-29: Identifying and managing economic, environmental, and social impacts

Highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities – including its role in the implementation of due diligence processes.

The executive board (the highest governance body), with the Vice President of Administration, manages environmental and social topics and processes, and Vice President of Finance and Controller dictates economic topics and processes.

Whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental, and social topics and their impacts, risks, and opportunities.

Kingston considers consultative advice from stakeholders (i.e., materiality survey, customer survey, etc.).

102-30: Effectiveness of risk management processes

Highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental, and social topics.

Kingston's Vice President of Administration attends management reviews for management systems, which cover risk management processes for environmental and social topics. Third party auditors verify accounting processes, internal controls, revenue perspectives, and accurate publishing/reporting. Additionally, topics such as fraud prevention and ethical financial practice are addressed. Key Vice Presidents (sales, finance) and the owners of the company are interviewed with

regard to performance and controls. Topics include internal issues such as cost, deals with business managers, overseas financial issues, banking investments, and customers.

102-31: Review of economic, environmental, and social topics

Frequency of the highest governance body's review of economic, environmental, and social topics and their impacts, risks, and opportunities.

The Executive Board meets monthly to review economic, environmental, and social topics and their impacts, risks and opportunities. Additionally, members from the executive board attend quarterly management reviews of the management systems that address these topics.

102-32: Highest governance body's role in sustainability reporting

The highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material topics are covered.

The Vice President of Administration is responsible for reviewing and approving the organization's sustainability report.

102-33: Communicating critical concerns

Process for communicating critical concerns to the highest governance body.

Critical concerns are communicated to the highest governance body through executive meetings, management review meetings, e-mails from administrated systems, corrective actions and results of audits that are communicated through intranet.

102-34: Nature and total number of critical concerns

Total number and nature of critical concerns that were communicated to the highest governance body.

A total of 1 critical concern regarding employment contract has been communicated to the highest governance body. The highest governance body is receiving monthly report outs to ensure this is resolved within our internal specified time frame. The organization is currently on track to resolve this critical concern and do not expect this to reoccur.

Mechanism(s) used to address and resolve critical concerns.

To address and resolve critical concerns, Kingston uses Risk Assessments, Auditing, and Corrective Action mechanisms.

102-35: Remuneration policies

a. Remuneration policies for the highest governance body and senior executives for the following types of remuneration:

i. Fixed pay and variable pay, including performance-based pay, equity-based pay, bonuses, and deferred or vested shares

N/A: Confidentiality Constraints (Privately held company)

ii. Sign-on bonuses or recruitment incentive payments

N/A

iii. Termination payments

N/A

iv. Clawbacks

N/A

v. Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees.

N/A

b. How performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topics.

N/A

102-36: Process for determining remuneration

Process for determining remuneration.

N/A: Confidentiality Constraint (Privately held company)

Whether remuneration consultants are involved in determining remuneration and whether they are independent of management.

N/A

Any other relationships that the remuneration consultants have with the organization.

N/A

102-37: Stakeholders' involvement in remuneration

How stakeholders' views are sought and taken into account regarding remuneration.

N/A: Confidentiality Constraint (Privately held company)

Not applicable

102-38: Annual total compensation ratio

Explanation for omission: Confidentiality Constraint (Privately held company)

102-39: Percentage increase in annual total compensation ratio

Explanation for omission: Confidentiality Constraint (Privately held company)

Stakeholder engagement

102-40: List of stakeholder groups

A list of stakeholder groups engaged by the organization.

The following is a list of our stakeholders and Kingston Departments that handle them;

- Local Authorities: Compliance, General Affairs, Logistics, Legal
- Insurance Companies: Risk Management, Product Compliance
- Environment: Environmental Health and Safety, Corporate Social Responsibility, General Affairs, Planning, Business Management, Packaging/Development, Original Design Manufacturer, Product Compliance
- Governments: Compliance, General Affairs, Logistics, Legal
- Employees: Public Relations, Human Resources, Environmental Health and Safety
- Original Equipment Manufacturers: Public Relations, Kingston Technology Service Department, Corporate Social Responsibility, Product Compliance, Quality Assurance
- Suppliers: Original Design Manufacturer, Public Relations, Corporate Social Responsibility, Planning, Procurement, Quality Assurance
- Consumers: Sales, Marketing, Public Relations, Human Resources, Corporate Social Responsibility, Non-Government Organization Certifications
- Non-Government Organizations: Compliance, Quality Assurance, Original Equipment Manufacturers
- Society: Human Resources, Corporate Social Responsibility, Public Relations

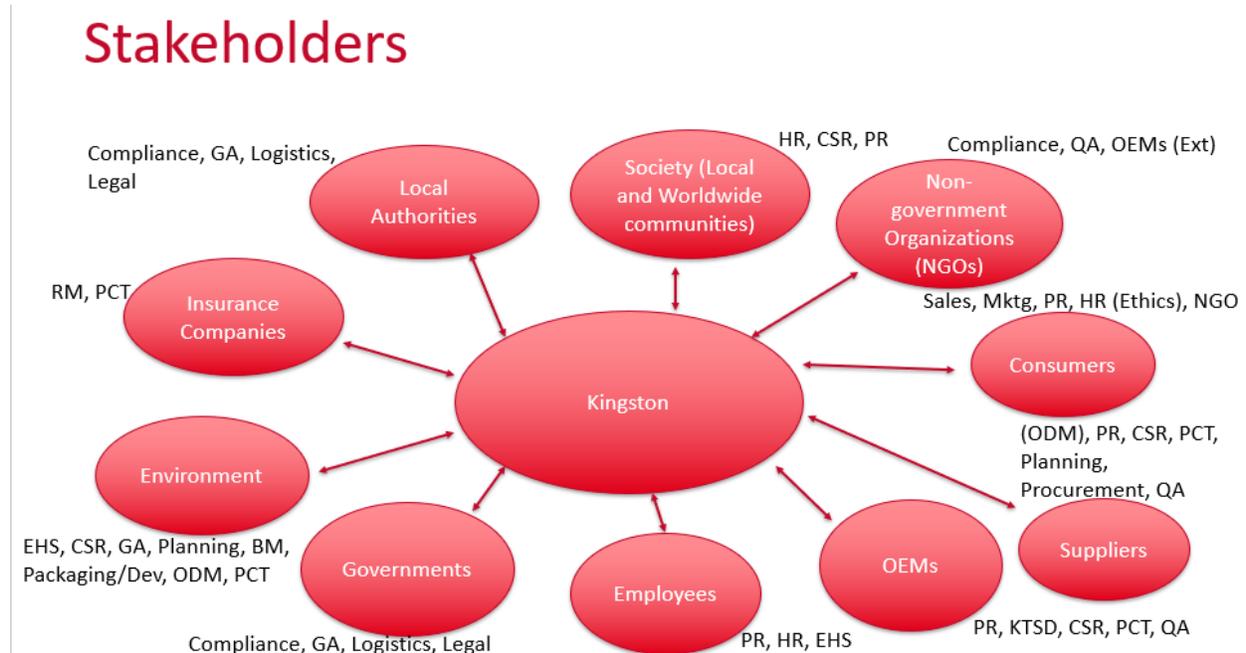
102-41: Collective bargaining agreements

Percentage of total employees covered by collective bargaining agreements.

0.0%

102-42: Identifying and selecting stakeholders

The following graphic indicates the stakeholders that we have determined, and the departments responsible for working with our stakeholders. The stakeholders are decided depending upon business interactivity.



102-43: Approach to stakeholder engagement

The stakeholder groups can be engaged through multiple methodologies.

- Annual Materiality Assessments engage the employee stakeholder group
- Annual Customer Surveys engage external customers (OEMs and suppliers) and consumers
- Quarterly Business Reviews engage multiple stakeholder groups including customers and employees
- Periodic Focus Group Surveys engage multiple stakeholder groups including consumers and employees, tied to launching a new product
- Semi-Annual Audits engage the NGO stakeholder group Annual Audits engage the Insurance stakeholder group
- Annual Self Reporting and Periodic Audits engage the Governments and Local Authorities stakeholder groups
- Periodic Community Engagement Events engage Society on local and worldwide levels
- Continual recycling and Energy reduction engage the environment stakeholder group

All stakeholders are integral to success of business, therefore, none of these were undertaken solely for the reporting process.

102-44: Key topics and concerns raised

Kingston utilizes an Employee Suggestion Program (ESP) to implement the employee stakeholder group's ideas and suggestions to enhance the work environment and continuous quality improvement. Employee Forum is implemented to share business updates and strategic plans to further Kingston's business.

The Townhall Meetings are used to provide a platform for employees to voice concerns and opinions to executives of the company.

Customers and Consumers communicate their feedback through Quarterly Business Reviews utilizing a scorecard.

Environment stakeholder group concerns are addressed through the Carbon Disclosure Project. Social and Environmental Compliance Scorecard raised the need to answer to the customers' requests.

Reporting practice

102-45: Entities included in the consolidated financial statements

Primary Operating Entities included in Kingston's consolidated financial statements or equivalent documents are as follows:

- Kingston Technology Company, Inc.
- Kingston Digital, Inc.
- Advanced Validation Labs
- Kingston Technology International Limited
- Kingston Digital International Limited
- Kingston Technology Far East Corp.
- Kingston Technology Shanghai Company Limited
- Kingston Technology Europe Limited
- Kingston Digital Europe Limited
- Shop Europe Limited
- Kingston Technology Electronics-Shanghai
- Kingston Solutions Inc

All entities included in the organization's consolidated financial statements or equivalent documents are covered by the report.

102-46: Defining report content and topic Boundaries

Kingston determines the topic boundaries through various methodologies for stakeholder engagement. Through that engagement, Kingston addresses its environmental, social, and economic topics. Different departments were involved in the process of determining the topic boundaries of

their report. Their function and impact on Kingston's business and the stakeholder groups established the topic Boundaries of this report.

The Materiality Assessment was utilized to determine how to implement the Reporting Principles. The Materiality Assessment ranked each topic from 1-5 (1 being not important and 5 being extremely important) and is used as guidance of prioritization of action items, syncing globally.

102-47: List of material topics

- Environmental topics: Materials, Energy, Water, Emissions, Environmental Compliance, Supplier Environmental Assessment
- Social topics: Employment, Labor/Management Relations, Occupational Health and Safety, Training and Education, Diversity and Equal Opportunity, Non-discrimination, Freedom of Association and Collective Bargaining, Child Labor, Forced or Compulsory Labor, Security Practices, Rights of Indigenous Peoples, Human Rights Assessment, Local Communities, Supplier Social Assessment, Public Policy, Customer Health and Safety, Marketing and Labeling, Customer Privacy, Socioeconomic Compliance

102-48: Restatements of information

No restatements of information

102-49: Changes in reporting

No changes in reporting

102-50: Reporting period

Calendar year of 2019

102-51: Date of most recent report

Most recent report date

3/2020

102-52: Reporting cycle

Based on the Calendar Year.

102-53: Contact point for questions regarding the report

a. The contact point for questions regarding the report or its contents.

Name

Elaine Chen

Email

Elaine_Chen@Kingston.com

Position

Manager, Corporate Compliance

Telephone

(714)427-3506

102-54: Claims of reporting in accordance with the GRI Standards

This report has been prepared in accordance with the GRI Standards:

In accordance - Comprehensive

102-55: GRI content index

See page 90-98 of Kingston Technology GRI 2020

102-56: External assurance

Kingston Technology uses NGO third-party certification validation companies (i.e., SGS). External assurance is through auditing requirements (i.e., Quality, EHS, ISMS), audits conducted by OEMs, RBA VAP process (verified audit provider) that audits sites manufacturing process, and other module certifications which are published on our website.

i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process

N/A: This report is not externally assured.

ii. The relationship between the organization and the assurance provider;

N/A: This report is not externally assured.

iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organization's sustainability report.

N/A: This report is not externally assured.

Environmental Topics

Materials

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

With several diverse products, the management of Kingston's product material is held in with extreme importance. The quality, safety, and sourcing methods of our products is important to Kingston as they play a large part of our promise to the customer to provide them with exceptional, top of the line technology products.

b. The Boundary for the material topic, which includes a description of

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston does not track the total amounts, neither in weight or volume, of raw materials that are used to produce the organization's primary products and services. Most of the components and parts used in Kingston's products are components and assembled as opposed to raw materials. Kingston has a worldwide Product Compliance management system in efforts to ensure metals and chemicals used in our products can be recycled and disposed of safely.

Regarding the health and safety of the consumers, Kingston tests and verifies our products to ensure it is safe for the consumer. All Kingston products are safety tested to ensure compliance and safety in the specific country it is sold in.

103-2: The management approach and its components

Kingston has a worldwide Product Compliance management system in efforts to ensure metals and chemicals used in our products can be recycled and disposed of safely, and are acquired responsibly.

Kingston manages the topic through a worldwide Product Compliance team with the purpose of ensuring that materials used in all Kingston's products are safe, sustainably sourced and free of conflict minerals.

Description

Kingston currently does not have a corporate goal for the materials in our products. We are working to procure paper and plastic packaging materials with recycled content and have made strides on projects that have reduced the use of plastics and paper. However, we have no set goals for materials.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

i. Evaluation of the management approach is made through internal and external sources. Internal sources include reviewing of applicable safety laws and regulations. Findings are reported out to design engineering and technical research groups. External approaches are primarily focused on safety certification performed by accredited labs.

ii. The results of the evaluation of the management approach

The results of product safety testing indicate the system is working toward stated goals.

iii. Any related adjustments to the management approach.

The product compliance team continues to drive direction of compliance in this area. Adjustments are made as observations and regulation changes become available, and processes and policies are developed from data received. Overall product compliance and its management approach remain valid.

GRI 301: Materials 2016

301-1: Materials used by weight or volume

i. Non-renewable materials used

0.0

ii. Renewable materials used.

0.0

Total weight or volume of materials used

0.0

Other unit explanation

N/A see supplemental information.

Supplementary information beyond GRI reporting requirements

Kingston does not track the total amounts, neither in weight or volume, of raw materials that are used to produce the organization's primary products and services. Most of the components and parts used in Kingston's products are components and assembled as opposed to raw materials. Kingston has a worldwide Product Compliance management system in efforts to ensure metals and chemicals used in our products can be recycled and disposed of safely.

301-2: Recycled input materials used

Explanation for omission

Kingston does not track the total amounts, neither in weight or volume, of raw materials that are used to produce the organization's primary products and services. Most of the components and parts used in Kingston's products are components and assembled as opposed to raw materials. Kingston has a worldwide Product Compliance management system in efforts to ensure metals and chemicals used in our products can be recycled and disposed of safely.

301-3: Reclaimed products and their packaging materials

Explanation for omission

Information on reclaimed products and their packaging materials is currently unavailable, but we are planning to collect and report on this information in the near future.

Energy

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

Kingston has always sought ways to be more energy efficient with the manufacturing and distribution of our products. We understand this affects the communities in which we live, as well as the cost of product production that the consumer eventually pays. With automation becoming more prominent in our planned growth, energy efficiency becomes even greater to minimize our footprint. This is an underlying reasoning for seeking renewable energy opportunities, controllable within our organization, such as the ongoing solar energy project for our production facility.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

The boundary for the material topic is limited to the manufacturing facilities world-wide, including the operations within an intra-building transportation. For each material topic, Kingston focuses on what it can directly control, thus minimizing impact and footprint as much as possible. Manufacturing facilities are located in:

- China
- Taiwan
- Ireland
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For energy, in most areas Kingston operates, we seek and purchase from utilities that include renewable sources, in some areas as much as 42% renewables in the mix. Construction has initiated on placing solar energy on our manufacturing roof in Fountain Valley. This will make-up 70% of the needed energy for production.

At this time, Kingston's reporting and measurement does not include the supply chain; however, this is an area we are actively developing for inclusion in future disclosures.

103-2: The management approach and its components

Kingston utilizes a CSR Management Committee (CSRMC) to discuss results, opportunities, and for decision-making regarding our energy usage and strategies that effect action.

Energy data is monitored and compiled by the internal Compliance Group using energy usage data and researched renewable energy mixes, rolled up to the CSRMC through the Vice President of Administration. Decisions such as the solar roof for the manufacturing building at one location are made based upon such data and discussion in this committee.

Description

The management approach is through broad based policies that ensure Kingston meets its CORE values. Goals and targets for energy usage (i.e., reduce energy intensity relative to production units) are included, and responsibilities and resources are outlined.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to the CSR Management Committee (CSRMC), and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO 45001 and ISO 14001 certifications that include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example with regard to energy, monitoring of appropriate data have initiated solar panel installation for Fountain Valley production activities, with the objective of energy usage reduction. Also, an objective for all global facilities for energy reduction has been initiated through Kingston's management approach.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received. Overall, the CSRMC and its management approach remain valid.

GRI 302: Energy 2016

302-1: Energy consumption within the organization

Total fuel consumption

2208553754400.0 J

Fuel types used

Petrol gasoline and diesel are the two fuel sources used.

Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

0.0 J

Types explanation

N/A

i. Electricity consumption

43931.94 J

ii. Heating consumption

0.0 J

iii. Cooling consumption

0.0 J

iv. Steam consumption

0.0 J

i. Electricity sold

0.0 J

ii. Heating sold

0.0 J

iii. Cooling sold

0.0 J

iv. Steam sold

0.0 J

Total energy consumption within the organization

2208553798331.94 J

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition),

US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity

<http://www.convertunits.com>

302-2: Energy consumption outside of the organization

Explanation for omission: Information on energy consumption outside of the organization is currently unavailable, but we are planning to collect and report on this information in the near future.

302-3: Energy intensity

Total energy intensity ratio

0.0 MWh

Total units produced

Type of energy

- Fuel
- Electricity
- Heating

Whether the ratio uses energy consumption within the organization, outside of it, or both.

within the organization

Supplementary information beyond GRI reporting requirements

The energy per units produced was calculated to be 0.00009079951748 MWh. The energy used to produce each individual product continues to decline.

302-4: Reduction of energy consumption

Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.

11954.16 MWh

Energy types

- Fuel
- Electricity
- Heating

Base year set to 2013 when all sites reported energy consumption for the first time.

Calculation methodology is based upon carbon equivalent energy per unit.

Supplementary information beyond GRI reporting requirements

Our intensity figures have declined 49.4% from our baseline year of 2013.

302-5: Reductions in energy requirements of products and services

Explanation for omission: Information on reductions in energy requirements of products and services is currently unavailable, but we are planning to collect and report on this information in the near future.

Water

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

Kingston does not use any water intensive processes nor consumes water for product output. We have not done a water assessment to see where the risks and water impacts lie in areas where we have facilities or through our supply chain but we intend to do an assessment in 2020 and create an baseline for future reporting.

b. The Boundary for the material topic, which includes a description of

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

The majority of our water usage is for personal use by employees (i.e., hygiene, restrooms, cooking where facilities allow for it). Our production processes do not use water (less than 5%), and we use recycled (grey) water when available at facilities where landscaping is present.

Kingston currently does not have information available on the topic as it applies within the supply chain.

103-2: The management approach and its components

As with all of our Environmental Topics, Kingston will report through the CSR Team to upper management any policies, commitments, goals and targets for water topics.

Although the majority of our water usage is for personal use by employees (i.e., hygiene, restrooms, cooking where facilities allow for it) and less than 5% is used in our production processes, Kingston is continually searching for methods to further reduce water usage.

Description

As with all of our Environmental topics, Kingston will report through the CSR Team to upper management any policies, commitments, goals and targets for water topics.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to the CSR Management Committee (CSRMC), and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO 45001 and ISO 14001 certifications that include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received. Overall, the CSRMC and it's management approach remain valid.

GRI 303: Water and Effluents 2018

303-1: Interactions with water as a shared resource

Description of how the organization interacts with water

The majority of our water usage is for personal use by employees (i.e., hygiene, restrooms, cooking where facilities allow for it). Our processes do not use water (less than 5%), and we use recycled (grey) water when available at facilities where landscaping is present.

Description of the approach used to identify water-related impacts

In alignment with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Kingston's Fountain Valley location monitors impacts on storm water quality that may be cause as a result of business-related activities. Sampling of storm water discharges are collected during storm water events throughout the year and quality impacts are verified by third party laboratories. Quality is determined using the NPDES Industrial General Permit standards.

Description of how water-related impacts are addressed

In alignment with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Kingston's Fountain Valley location

addresses water-related impacts using the methods identified in this standard. Pollutant sources and necessary changes to prevent water quality changes are identified in an annual site assessment at this location that includes the involvement of relevant personnel. Kingston currently has not initiated engagement with suppliers or customers in regards to water-related impacts, but is in the process of initiating baseline assessments in this regard.

Explanation of the process for setting any water-related goals and targets that are part of the organization's management approach

Goals and targets are not established, however, Kingston's Fountain Valley location monitors water impacts through our Storm Water Pollution Prevention Program that is aligned with the NPDES Industrial General Permit. Kingston will continue to work with our customers and other partners on water mitigation programs. Prioritization focuses on locations with the highest headcount since this is the primary driver of usage. Water saving hardware has been and continues to be installed into our facilities.

303-2: Management of water discharge-related impacts

A description of how standards for facilities operating in locations with no local discharge requirements were determined

Guidelines for discharges that may impact water quality at the Kingston Fountain Valley site are based on the NPDES Industrial General Permit water quality standards. Kingston is collecting information on this topic from other sites for future disclosure.

A description of any internally developed water quality standards or guidelines

Guidelines for discharges that may impact water quality at the Kingston Fountain Valley site are based on the NPDES Industrial General Permit water quality standards.

A description of any sector-specific standards considered

The Kingston Fountain Valley site aligns its water quality standards with those set by the NPDES for the Manufacturing sector.

A description whether the profile of the receiving waterbody was considered

The receiving waterbody for all discharges made by the Fountain Valley site are taken into consideration when determining constituents for which to monitor in our Storm Water Pollution Prevention Program to determine water quality impacts that may be specific to the waterbody discharged to. This is required of the NPDES Industrial General Permit (IGP).

303-3: Water withdrawal

Total water withdrawal from third-party water

133

Total water withdrawal from all areas in mega liters

133

Total water withdrawal from third-party water from water stress areas

130

Total water withdrawal from all areas with water stress in megaliters

130

Total water withdrawal from surface water - Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids)

133

Contextual information

Since all water sources are from municipal sources, including grey water for landscaping, metered methodology was used. Water volumes are based upon metering for consumption.

303-4: Water discharge

Total water discharge to groundwater

13

Total water discharge to third-party water sent for use to other organizations

120

Total water discharge to all areas in megaliters

133

Water discharge by freshwater ($\leq 1,000$ mg/L Total Dissolved Solids)

133

Water discharge to all areas with water stress by freshwater ($\leq 1,000$ mg/L Total Dissolved Solids)

130

Total water discharge to all areas with water stress in megaliters

130

Priority substances of concern for which discharges are treated, including: how these substances were defined, and any international standard, authoritative list, or criteria used

Guidelines for discharges that may impact water quality at the Kingston Fountain Valley site are based on the NPDES Industrial General Permit water quality standards, which determine that our Fountain Valley location only test and monitor for Total Suspended Solids, pH, Oil and Grease levels. Kingston is collecting information on this topic from other sites for future disclosure.

Priority substances of concern for which discharges are treated, including: the approach for setting discharge limits for priority substances of concern

Guidelines for discharges that may impact water quality at the Kingston Fountain Valley site are based on the NPDES Industrial General Permit water quality standards, which determine that our Fountain Valley location only test and monitor for Total Suspended Solids, pH, Oil and Grease levels. At this location, this is implemented by a Storm Water Pollution Prevention Program. Kingston is collecting information on this topic from other sites for future disclosure.

Contextual information

Guidelines for discharges that may impact water quality at the Kingston Fountain Valley site are based on the NPDES Industrial General Permit water quality standards. Kingston is collecting information on this topic from other sites for future disclosure, including standards, methodologies, and assumptions used.

303-5: Water consumption

Total water consumption from all areas

133

Any comments

Kingston does not use any water intensive processes nor consumes water for product output.

Total water consumption from all areas with water stress

130

Any comments

Kingston does not use any water intensive processes nor consumes water for product output.

Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact

Kingston does not store water on site.

Contextual information

Water discharges are known through metering. While discharges to municipal treatment facilities are estimated with certainty.

Emissions

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

Kingston operates in areas where air quality is of concern to employees and the community. Many areas are mandated by regulation to limit pollution. Due to these restrictions and concerns for employees and the community, Kingston continually evaluates emissions through stack air monitoring, making changes in the materials used in production to reduce potential air emissions, and measuring to ensure desired results.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

The boundaries for the material topic are limited to the manufacturing facilities world-wide, including the operations within and intra-building transportation. For each material topic, Kingston focuses on what it can directly control, thus minimizing impact and footprint as much as possible.

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For emissions, Kingston has and continues to seek methods to reduce emissions from production and internal transportation. As examples, we have moved to using equipment that is using less energy in production thus less polluting and continue to use rechargeable electric forklifts for internal material management transportation.

At this time, Kingston's reporting and measurement does not include the supply chain; however, this is an area we are actively developing for inclusion in future disclosures.

103-2: The management approach and its components

Kingston utilizes a CSR Management Committee (CSRMC) to discuss results, opportunities, and for decision-making regarding our emissions and strategies that affect action.

Emissions data is monitored and compiled by the internal Compliance Group using emission stack test results and use of efficient and cleaner re-flow ovens, rolled up to the CSRMC through the Vice President of Administration.

Description

Decisions such as replacing re-flow ovens for reduced emissions during manufacturing and reduction of materials used in cleaning through evaporation are made based upon such data and discussion in this committee. The management approach is through broad based policies that ensure Kingston meets its CORE values. Goals and targets for emissions (i.e., efficient clean operating re-flow ovens) are included, and responsibilities and resources are outlined.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to the CSR Management Committee (CSRMC), and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO 45001 and ISO 14001 certifications that include the review of CSR components. For the CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example with regard to emissions, monitoring of appropriate data has initiated the replacement of re-flow ovens, with the objective of reduction of emissions during manufacturing, and reduction of materials used in cleaning through evaporation for all global sites.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received. Overall, the CSRMC and its management approach remain valid.

GRI 305: Emissions 2016

305-1: Direct (Scope 1) GHG emissions

a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.

147.52 in metric tons of CO2 equivalent

b. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all

- CO2

c. Biogenic CO2 emissions in metric tons of CO2 equivalent.

191.81 in metric tons of CO2 equivalent

d. Base year for the calculation if applicable, including:

i. The rationale for choosing it

Base year has been updated to 2012 when all global facilities were reported.

ii. Emissions in the base year

174.51 in metric tons of CO2 equivalent

iii. The context for any significant changes in emissions that triggered recalculations of base year emissions.

n/a

e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition), US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity.

f. Consolidation approach for emissions; whether equity share, financial control, or operational control.

Operational control

g. Standards, methodologies, assumptions, and/or calculation tools used.

Direct measurements are taken from purchased energy reports.

305-2: Energy indirect (Scope 2) GHG emissions

a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.

29690.16

b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.

Not Applicable

c. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.

- CO2

d. Base year for the calculation, if applicable, including:

i. The rationale for choosing it.

Base year has been updated to 2012 when all global facilities were reported.

ii. Emissions in the base year in metric tons (t) of CO2.

24595.93

ii. Base year

2012

iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.

n/a

e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition), US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity.

f. Consolidation approach for emissions, whether equity share, financial control, or operational control.

Operational control

g. Standards, methodologies, assumptions, and/or calculation tools used.

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity

305-3: Other indirect (Scope 3) GHG emissions

Explanation for omission: Scope 3 information is currently unavailable, but we are planning to collect and report Scope 3 information in the near future.

305-4: GHG emissions intensity

GHG Emissions intensity ratio (Scope 1)

0.0

Absolute GHG Emissions in metric tons (t) of CO2 equivalent

147.52

Organization-specific metric (No unit, only a number)

496000000.0

GHG Emissions intensity ratio (Scope 2)

0.0

Absolute GHG Emissions in metric tons (t) of CO2 equivalent

29690.16

Organization-specific metric (No unit, only a number)

496000000.0

Organization- specific metric (the denominator) chosen to calculate the ratio.

Number of units produced

Types of GHG emissions included in the intensity ratio

- Direct (Scope 1)
- Energy Indirect (Scope 2)

Gases included in the calculation

- CO2

Supplementary information beyond GRI reporting requirements

The Scope 1 GHG emissions intensity ratio was calculated to be at 0.0000003 tonnes. The Scope 2 GHG emissions intensity ratio was calculated to be at 0.00005986 tonnes.

305-5: Reduction of GHG emissions

Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all

Scope 1 reductions (in metric tons (t) of CO2)	0
Scope 2 reductions (in metric tons (t) of CO2)	0
Scope 3 reductions (in metric tons (t) of CO2)	0
Total	0
Offsets	0

Gases included in the calculation

- CO2

Base year or baseline, including the rationale for choosing it.

Base year was updated to 2012 when all global facilities were reported.

Standards, methodologies, assumptions, and/or calculation tools used.

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity

Supplementary information beyond GRI reporting requirements

Though we have not decreased in emissions output, increase year over year is due to intra-facility transportation (fleet growth) due to product output growth while ensuring security due to product shrinkage. Kingston has experienced market growth over the past year, thus increased energy usage as well as intra-facility transportation.

Installing solar PVC system, including battery storage, is anticipated to account for about 70% of the Fountain Valley energy needs. CO₂e Tonnes emissions are estimate to reduce pull from the grid and will be considered in other locations. This project build was completed in the fourth quarter of 2019 and will be activated in 2020.

305-6: Emissions of ozone-depleting substances (ODS)

Explanation for omission: Kingston does not include or require the use of ozone-depleting substances in its processes.

305-7: Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions

a. Significant air emissions, in kilograms or multiples, for each of the following:

i. NOX

0.0 m3

ii. SOX

0.0 m3

iii. Persistent organic pollutants (POP)

0.0 m3

iv. Volatile organic compounds (VOC)

0.0 m3

v. Hazardous air pollutants (HAP)

0.0 m3

vi. Particulate matter (PM)

0.0 m3

vii. Other standard categories of air emissions identified in relevant regulations

0.0 m3

b. Source of the emission factors used.

n/a

c. Standards, methodologies, assumptions, and/or calculation tools used.

n/a

Environmental Compliance

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

Through ISO 14001, Environmental Aspects are collected and challenge our organization to look at our worldwide impacts. Kingston has started to look at business activities outside of manufacturing to travel, packaging, and energy usage. We are looking to have baseline numbers by the end of 2021.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston utilizes the ISO 14001 Environmental management system as a guideline towards compliance with environmental regulations at each Kingston location.

Kingston has not yet measures the boundary of impacts through supplier relationships. This information is in the process of being collected for future reporting.

103-2: The management approach and its components

Currently Kingston manages this topic through ISO 14001 and through RBA code of conduct and expectations. Through ISO, there are policies, goals and targets that have responsibilities and resources provided and are measurable and audited. Through the RBA, Kingston has established a CSR (Corporate Social Responsibility) team that is expected to help create Science based targets for ourselves and to help monitor environmental stewardship from our suppliers.

Kingston utilizes the ISO 14001 Environmental management system as a framework for meeting environmental compliance requirements. This system is used to closely monitor Kingston's impacts on environmental aspects.

Description

i. Kingston utilizes the ISO 14001 Environmental management system as a framework for meeting environmental compliance requirements. This system is used to closely monitor Kingston's impacts

on environmental aspects. Through the our QEHS policy outlined by the CARE acronym, which stands for Commitment, Accountability, Responsibility, and Empowerment, Kingston communicates and aligns business with its policy to all employees world wide.

ii. Kingston is committed to ensuring environmental compliance by monitoring and ensuring environmental compliance following the ISO 14001 standards, using internal and external sources. Kingston aligns it's policies with commitment to our QEHS management systems that are communicated through the C in our CARE policy, which stands for commitment.

iv. Kingston accepts responsibility for environmental compliance and ensures alignment of business with the ISO 14001 Environmental management system. Employee and company wide alignment is communicated through the R in the CARE policy, which stands for responsibility.

v. Kingston ensures through the CSR and Operational Compliance team that the appropriate resources are gathered and available to ensure environmental compliance on behalf of Kingston.vii. Kingston has developed a system in alignment with ISO 14001 to ensure procedures, instruction, etc. that is required to sustain environmental compliance.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources, including internal audits of systems that are to track and monitor progress of initiatives, and report results to the CSR Management Committee (CSRMC), and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO 45001 and ISO 14001 certifications that include the review of CSR components. For the CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals, or identify areas of improvement.

iii. Any related adjustments to the management approach.

EHS, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws, NGOs OHSMS standard criteria changes, and experiences become available. Processes and policies are developed and modified from data received. Overall, the EHS, CSRMC and its management approach remain valid.

GRI 307: Environmental Compliance 2016

307-1: Non-compliance with environmental laws and regulations

a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of:

i. Total monetary value of significant fines

0.0 USD

ii. Total number of non-monetary sanctions

0.0 USD

iii. cases brought through dispute resolution mechanisms

Kingston has not had non-compliance incidents.

b. If the organization has not identified any non-compliance with environmental laws and/or regulations, a brief statement of this fact is sufficient.

Kingston has not identified any non-compliance with environmental laws and/or regulations.

Supplier Environmental Assessment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a manufacturer with several suppliers around the world and as a member of the RBA, the management of Kingston's supply chain is held with high importance. The quality of our products, environmental and social impact of our processes are important to Kingston as they play a large part of our promise to our communities and customers to provide them with exceptional, top of the line technology products. Kingston evaluates its suppliers to ensure that suppliers are upholding quality, environmental, and social standards that align with our and RBA standards.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

The impacts occur at locations where Kingston products are manufactured and sold.

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston utilizes internal and external groups to audit and review suppliers for adherence to the RBA Code of Conduct.

Kingston has not included the collection of environmental specific metrics from our suppliers in the supplier environmental assessment process.

103-2: The management approach and its components

Kingston manages the topic of suppliers through the CSRMC, along with our purchasing and procurement teams, by utilizing RBA VAP audits, internal vetting reports, and CSR supplier audits. These reports provide advice to the CSRMC, HR (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect purchasing, procurement, and supplier's actions.

Supplier management issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The CSRMC is to provide input and advice on direction of supplier management.

Description

Management approach is through CSR policies and procedures that have been vetted to comply with laws at the locations in which Kingston's suppliers operate. Kingston has an active approach for the assessment of the environmental impacts of its suppliers.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of suppliers that track and monitor progress of initiatives, and report results to the Compliance Manager and the CSRMC. Findings are reported out to Executives. External approaches are primarily focused on RBA VAP audits and CSR supplier audits.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An objective for all global facilities for suppliers has been initiated through RBA VAP and internal audits.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as observations and audit data becomes available, and processes and policies are developed from data received. Overall CSRMC and its management approach remain valid.

GRI 308: Supplier Environmental Assessment 2016

308-1: New suppliers that were screened using environmental criteria

Percentage of new suppliers screened using environmental criteria

100.0%

308-2: Negative environmental impacts in the supply chain and actions taken

Number of suppliers assessed for environmental impacts.

182

Number of suppliers identified as having significant actual and potential negative environmental impacts.

45

Significant actual and potential negative environmental impacts identified in the supply chain.

None identified at this moment. We are not aware of any negative Environmental impacts in our supply chain.

Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.

0%

Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.

0.0%

None identified at this moment. We are not aware of any negative Environmental impacts in our supply chain.

Social Topics

Employment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our employees to the utmost importance. We understand our employees are one of our top resources, which is why one of Kingston's core values is Investing in our Employees. This core value is Kingston's commitment to the well-being of our employees.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

Employment resources, direction and data are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The CSRMC is involved from an adjunct standpoint to provide input and advice on direction of employment management.

Description

Management approach is through broad and specific Human Resources policies and procedures that have been vetted to at least comply with employment laws in which Kingston operates to ensure it meets the company's CORE values. Kingston has an active diversity approach for employment opportunities including upward mobility within the company. Our senior management and executive make-up reflect this approach. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to Human Resources: the CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on validation audits for the ISO 45001 that include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an

objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

Human Resources, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, the Human Resources, CSRMC and its management approach remain valid.

GRI 401: Employment 2016

401-1: New employee hires and employee turnover

Region	New Hires	Under Age 30	Age 30-50	Over Age 50	Male	Female
Ireland	2	0 (0.0%)	2 (100%)	0 (0.0%)	1 (50%)	1 (50%)
USA	63	28 (44.4%)	31 (49.2%)	4 (6.3%)	40 (63.5%)	23 (36.5%)
Taiwan	169	97 (57.4%)	71 (42%)	1 (0.1%)	81 (47.9%)	88 (52.1%)
UK	49	21 (42.9%)	24 (48.9%)	4 (8.2%)	25 (51%)	24 (49%)
China	477	286 (60%)	191 (40%)	0 (0.0%)	86 (18%)	391 (82%)

Total number and rate of employee turnover during the reporting period, by age group, gender and region

Region	Turnover	Under Age 30	Age 30-50	Over Age 50	Male	Female
Ireland	1	0 (0.0%)	1 (100.0%)	0 (0.0%)	0 (0.0%)	1 (100.0%)
USA	27	6 (22.2%)	9 (33.3%)	12 (44.4%)	16 (59.3%)	11 (40.7%)
Taiwan	88	42 (47.7%)	39 (44.3%)	7 (8.0%)	45 (51.1%)	43 (48.9%)
UK	31	7 (22.6%)	17 (54.8%)	7 (22.6%)	17 (54.8%)	14 (45.2%)
China	495	257 (51.9%)	238 (48.0%)	0 (0.0%)	69 (13.9%)	426 (86.1%)

401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees

a. Benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation.

Significant location of operation

US, UK, Ireland, China, Taiwan

i. life insurance

True

ii. health care

True

iii. disability and invalidity coverage

True

iv. parental leave

True

v. retirement provision

True

vi. stock ownership

True

vii. others

True

b. The definition used for 'significant locations of operation'.

Significant locations of operation include entities in which Kingston has significant operations.

401-3: Parental leave

a. Total number of employees that were entitled to parental leave, by gender.

Total number of employees that were entitled to parental leave, Male

1441

Total number of employees that were entitled to parental leave, Female

1901

b. Total number of employees that took parental leave, by gender.

Total number of employees that took parental leave, Male

18

Total number of employees that took parental leave, Female

59

c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.

Total number of employees that returned to work in the reporting period after parental leave ended, Male

20

Total number of employees that returned to work in the reporting period after parental leave ended, Female

35

d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.

Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, Male

17

Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, Female

21

Return to work and retention rates of employees that took parental leave, by gender

Male	Female
100%	59%

Retention rate of employees that took parental leave, by gender: N/A due to 2019 base year.

Labor/Management Relations

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston always holds our employees to the upmost importance. We understand our employees are one of our top resources and our greatest assets, which is why one of Kingston's core values is Integrity and Fairness. This core value is Kingston's commitment to the well-being of our employees.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Employee relationships are very important to the success of Kingston. As the President of our company has said in the past, we can replace all of our structures and products, but we cannot replace the minds of our employees, for without whom we would not be successful. As such, management

and labor relationships are continually monitored. In our sustainability training, we emphasize that we take care of our employees and our employees take care of us.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

Employment resources, direction and data are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The CSRMC is involved from an adjunct standpoint to provide input and advice on direction of employment management.

Description

Management approach is through broad and specific Human Resources policies and procedures that foster positive management labor relationships have and at least comply with employment laws in which Kingston operates to ensure it meets the company's CORE values.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including monitoring the process of internal relationships with any resulting issues reported to Human Resources and CSRMC. External approaches involve any formal complaints that would result in Kingston having to respond to. In 2019, we experienced no such external actions.

ii. The results of the evaluation of the management approach

The results of external and internal monitoring indicate the system is working.

iii. Any related adjustments to the management approach.

Human Resources, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information and experiences become available, and processes and policies are developed from data received. Overall, the Human Resources, CSRMC and its management approach remain valid.

GRI 402: Labor/Management Relations 2016

402-1: Minimum notice periods regarding operational changes

Kingston provides advanced notices in accordance with regulatory requirements in the different regions in which we operate in. Advanced notice periods are based upon the particular change and the number of employees affected by them. As a privately held company, employees do not have representatives.

Organization with collective bargaining agreements

No

Occupational Health and Safety

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston always holds our employees to the upmost importance. We understand our employees are one of our top resources and our greatest assets, which is why one of Kingston's core values is Investing in our Employees. This core value is Kingston's commitment to the well-being of our employees, which includes an interactive Occupational Health and Safety Management System.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal EHS department, utilizing a validated and certified Occupational Health and Safety Management System, in conformance with ISO 45001.

Management approach is to prevent occupational injuries and illnesses that would stem from risks and exposures within the workplace.

Description

Management approach is through specific ISO 45001 policies and procedures that have been implemented and at a minimum, comply with workplace safety laws in which Kingston operates to ensure it meets the company's CORE values. Kingston has an active approach for the identification of risks and exposures, and corrective action process. Our senior management and executives, along with the CSRMC receive regular reporting and provide strategic decision-making with regards to these efforts.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to the Environmental Health and Safety (EHS) department. The CSRMC is involved as items are reported out to Executives in management review. External approaches are primarily focused on validation audits for the ISO 45001 that include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to occupational health and safety, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for occupational health and safety performance with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

EHS, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws, NGOs OHSMS standard criteria changes, and experiences become available. Processes and policies are developed and modified from data received. Overall, the EHS, CSRMC and its management approach remain valid.

GRI 403: Occupational Health and Safety 2018

403-1: Occupational health and safety management system

Whether an occupational health and safety management system has been implemented

Yes

Other information

Kingston Technology has an occupational health and safety management system that meets the criteria set forth in ISO 45001 and has attained the ISO Safety certification for the past 16 years. The company has transitioned to ISO 45001. The occupational health and safety management system was implemented as part of Kingston Technology's commitment to a healthy and safe working environment for its employees, visitors, and contractors. The certifications provide assurance to organizations that purchase our products and services.

Is the system implemented because of legal requirements?

No

Is the system implemented based on recognized risk management and/or management system standards/guidelines?

Yes

Standards or guidelines

Both frameworks (ISO 14001 and ISO 45001) are globally recognized risk management and management system standards.

Description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system

All areas and activities within our controllable work environments falls within the scope of our occupational health and safety management system. This includes employees, visitors, and contractors. Should visitors require any health and safety protective equipment, Kingston shall provide this to them.

403-2: Hazard identification, risk assessment, and incident investigation

Description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks

Within the ISO 45001 safety management system framework, Kingston Technology utilizes monthly safety inspections of the workplace, scored risk assessments of all workplace activities and machinery, and a risk observation assessment (similar to a job safety analysis) process to determine work-related hazards and assess risks. These processes are applied to routine and non-routine workplace activities and use of machinery. Application of the hierarchy of controls is part of the corrective action process from the findings of these processes.

Description of the processes followed to ensure the quality of these processes, including the competency of persons who carry them out

Each of these processes is audited through internal and external audits to ensure integrity of the process, and the people who carry out these audits are trained for this quality assurance function.

Description of how the results of these processes are used to evaluate and continually improve the occupational health and safety management system

The internal and external audits are completed as a continuous improvement process. Also, anyone in the organization can provide input at any time to report hazards and help improve these processes.

Description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals

Upon hire, employees are informed of Kingston's Injury, Illness, and Prevention Plan which sets up Kingston's safety culture. Employees are encouraged to report hazards and hazardous situations through several means including, but not limited to: an anonymous hotline, Risk Assessment Procedures, and Incident Investigations. Workers are protected through the CSR Whistleblower policies.

Description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals

Globally, many policies are trained to all employees through Kingston's Environmental, Health and Safety Program and the CSR Program(s). These policies/procedures are trained to enable employees to identify hazards and remove themselves from hazards. Policies included but not limited to are: Risk Assessments, IIPP (Injury, Illness, Prevention Program), Incident Reporting, Whistleblower Safety, Ethics, etc.

Description of the processes used to investigate work-related incidents

In Kingston's Health and Safety Management System, there is a section on occupational injury/illness investigation. The process states that:

All occupational incidents, accidents, and hazardous material exposures, no matter how minor will be thoroughly investigated. To determine the causes and assess the risks and hazards, and corrective actions, the following process is utilized:

Visiting the incident/accident scene as soon as possible.

Interviewing the injured worker(s), if possible.

Interviewing witnesses individually, not together.

Examining the entire work area for additional factors associated with the incident or accident.

Determine root cause(s).

Determine corrective action to prevent a recurrence and document.

403-3: Occupational health services

Description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them

All contractors and visitors are required to review, discuss, and sign-off on expected safe practices while visiting our organization. Contractors are also required to provide their safety documents and equipment to be used while on-site. Any contractor lacking in safety processes is either not allowed or will agree and follow Kingston's safety procedures. Any occupational health and safety exposures or programs that require medical surveillance or treatment, Kingston ensures the confidentiality of personal health-related information.

403-4: Worker participation, consultation, and communication on occupational health and safety

Description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system

Kingston utilizes the following system to facilitate a continuous flow of health and safety information between management and all employees in a form that is readily understandable and consists of the following tools:

1. EHS Management Review Meetings.
2. Production Meetings.
3. New employee orientation, including a discussion of health and safety policies and procedures.
4. Workplace health and safety, training programs.
5. Effective communication of health and safety concerns and/or changes that could affect workplace health and safety between employees and supervisors, including language translations where appropriate.
6. Employee involvement and consultation arrangements are documented and interested parties are informed.
7. An employee suggestion program (ESP) where individual employees can receive recognition for improving the health and safety, and environment of the workplace using the ESP.
8. Posted and/or distributed safety information.

Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees

Kingston does not utilize a formal joint management-worker health and safety committee. Kingston is also not unionized, therefore there are no formal agreements regarding occupational health and safety topics within any bargaining units.

403-5: Worker training on occupational health and safety

Description of any occupational health and safety training provided to workers

All Kingston employees, including managers and supervisors, shall have training and instruction on general and job-specific health and safety practices and procedures. Training and instruction shall

be provided as follows:

1. For all new employees through New Employee Orientation.
2. For all employees with respect to specific hazards to each employee's job assignment.
3. For all employees given a new job assignment for which training has not been previously provided.
4. Whenever new materials, substances, processes, procedures or equipment are introduced to the workplace and represent a new or unknown hazard.
5. Whenever a new or previously unrecognized hazard is discovered resulting from: an observation, safety suggestion, safety inspection, or an issuance of a CAR.
6. For all supervisors to familiarize them with the health and safety, and environmental hazards to which employees under their immediate direction and control may be exposed.
7. For all contractors conducting work at Kingston's controlled workplaces.
8. Visitors receive a debrief and are required to sign off on our health and safety expectations in the workplace.

403-6: Promotion of worker health

Explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided

Kingston facilitates worker's access to non-occupational medical and healthcare services through the on-boarding process. During this process, employees are informed of the services available to them. Services vary region to region but include at a minimum:

Employee Assistance Program

Medical

Dental

Well-being Program

Examples of additional services include:

Physical examinations

Gym access

Fitness classes

Description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks

Kingston provides resources for health risks including:

Physical Health

Blood Pressure

Mental Well-being

Mental Health Awareness

Stress Management

Resources are facilitated through various methods including:

Newsletters

Lunch and Learns

Articles
Webinars

403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

Description of the organization's approach to preventing or mitigating significant negative occupational health and safety impacts

Kingston Technology utilizes the ISO 45001 framework, to which Kingston Technology is certified, to leverage influence on our interested parties to prevent or mitigate significant negative occupational health and safety impacts.

403-8: Workers covered by an occupational health and safety management system

Has the organization implemented an occupational health and safety management system based on legal requirements and/or recognized standards/guidelines

Yes

The number of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system.

856

The percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system.

100

The number of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been internally audited.

856

The percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been internally audited.

100

The number of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been audited or certified by an external party.

856

The percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been audited or certified by an external party.

100

Have there been any workers excluded from this disclosure?

No

Contextual information

The ISO 45001 Occupational Health and Safety management system, which Kingston is certified to, ensures this process applies to all employees and workers who are not employees who are on Kingston's controlled work environments.

403-9: Work-related injuries

Information for all employees:

The number of fatalities as a result of work-related injury.

0

The rate of fatalities as a result of work-related injury.

0.0

The number of high-consequence work-related injuries (excluding fatalities).

0

The rate of high-consequence work-related injuries (excluding fatalities).

0.0

The number of recordable work-related injuries.

0

The rate of recordable work-related injuries.

0.0

The main types of work-related injury

Slips and falls, traffic, sources of motion, rolling and pinching objects.

The number of hours worked

6197616.5

Information for all workers who are not employees but whose work and/or workplace is controlled by the organization

The number of fatalities as a result of work-related injury.

0

The rate of fatalities as a result of work-related injury.

0.0

The number of high-consequence work-related injuries (excluding fatalities).

0

The rate of high-consequence work-related injuries (excluding fatalities).

0.0

The number of recordable work-related injuries.

1

The rate of recordable work-related injuries.

0.0

The main types of work-related injury

Manual handling

The number of hours worked

0.0

The work-related hazards that pose a risk of high-consequence injury

Sources of motion, rolling and pinching objects, electrical hazards, slips and falls, and sharp and falling objects.

How these hazards have been determined

Kingston utilizes the risk assessment process as part of the OHSAS 18001 and ISO 45001 management systems to determine hazards. This risk assessment process includes numerical ranking of hazards that provide an indication of probability and severity.

Which of these hazards have caused or contributed to high-consequence injuries during the reporting period

None, as these have been controlled through the correction action plans that stem from the risk assessments.

Actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls

This is an ongoing effort, processes and equipment for work equipment are not controlled via any of the hierarchy of controls.

Actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls

Kingston applies the OHSAS 18001 and ISO 45001 risk assessment process to these types of risks. The identified types of risks are controlled through engineering.

The rates have been calculated based on

200,000 hours worked

Have there been any workers excluded from this disclosure?

No

Contextual information

Contractors are not included in rating because each company maintains their own records for their injury rates. This is in conformance with information privacy standards. Kingston utilizes a contractor control system which includes review of injury rates prior to considering usage of the contractor on-site.

403-10: Work-related ill health

Information for all employees:

The number of fatalities as a result of work-related ill health

0

The number of cases of recordable work-related ill health

6

The main types of work-related ill health

Strains

Information for all workers who are not employees but whose work and/or workplace is controlled by the organization:

The number of fatalities as a result of work-related ill health

0

The number of cases of recordable work-related ill health

0

The main types of work-related ill health

N/A

The work-related hazards that pose a risk of ill health

The work-related hazards that pose risks are noise, minor chemical exposure (dermal), operational process dust (only exposure is in one operation)

How these hazards have been determined

Kingston utilizes the risk assessment process found in the OHSAS 18001 and ISO 45001 management systems to determine hazards. This risk assessment process includes numerical ranking of hazards that provide an indication of probability and severity.

Which of these hazards have caused or contributed to high-consequence injuries during the reporting period

0 due to preventative actions applied by Kingston Technology's risk assessment outcomes.

Actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls

The dust and noise hazards are controlled through engineering methods. Chemical exposures are controlled through engineering substitution and personal protective equipment.

Have there been any workers excluded from this disclosure?

No

Contextual information

Exposure and control measures are validated through completion of industrial hygiene surveys.

Training and Education

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our employees to the upmost importance. We understand our employees are one of our top resources, which is why one of Kingston's core values is Investing in our Employees through continual training and education. This core value is Kingston's commitment to the well-being of our employees.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For training and education, Kingston provides opportunities and access to educational resources and educational reimbursement.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

Employment training and educational resources are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executives and the Board (as needed).

Description

Management approach is through broad and specific Human Resources processes that are monitored for anticipated skill and educational need. This is conducted to ensure Kingston meets the company’s operational needs in a safe and environmentally conscious productive, and efficient manner.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal sources with external influence. Kingston tracks and ensures the skills that are needed and ensures that training is conducted, and employees successfully complete the training.

ii. The results of the evaluation of the management approach

The results of external and internal audits and monitoring data indicate the system is working toward stated goals. Also, internal personal performance metrics provide an indication of where the transfer of knowledge has been effective.

iii. Any related adjustments to the management approach.

Adjustments are made as new information, new products, new equipment, and new experiences become available. The educational and training process is modified based upon that information. Overall, the Human Resources, CSRMC and its management approach remain valid.

GRI 404: Training and Education 2016

404-1: Average hours of training per year per employee

Average hours of training that the organization's employees have undertaken during the reporting period, by gender:

Gender	Average hours of training
Male	324.76
Female	250.94

Average hours of training that the organization's employees have undertaken during the reporting period, by employee category

Category name	Average hours of training
Management	76.83
Professional/Technical	289.58
Sales	37.22
Clerical/Administrative	55.76
Production/Warehouse	122.24

404-2: Programs for upgrading employee skills and transition assistance programs

Programs implemented and assistance provided to upgrade employee skills include:

- Tuition Reimbursement

- Certified training courses from external sources
- Communication and Collaboration
- On the job training
- Voluntary training (e.g. Business Writing, Microsoft Office)
- Paid Time-off work to those in external courses that upgrade employee skills
- Peer-led training to inform new employees about the organization
- Online database which provides employees opportunities to enhance targeted skill sets

Scope of programs implemented include and vary within all locations in which Kingston has significant operations.

Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

- Retirement planning services
- Outplacement services for separating employees
- Severance pay

404-3: Percentage of employees receiving regular performance and career development reviews

Gender	% of employees per gender who received a regular performance and career development review during the reporting period
Male	84.2
Female	84.6

Employee category name	% of employees who received a regular performance and career development review during the reporting period
Management	30.0
Professional/Technical	51.0
Sales	22.0
Clerical/Administrative	31.0
Production/Warehouse	49.0

Diversity and Equal Opportunity

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our employees to the utmost importance. Kingston operates in very diverse communities and serves a widely diverse customer base, and as such, Kingston strives to reflect these communities. We understand our employees are one of our top resources, which is why one of Kingston's core values is Respect for Each Other. This core value is Kingston's commitment to respecting each other including our employees, our customers, and our community.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates: China, Ireland, Taiwan, United Kingdom, United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston is committed to upholding a culture where diversity is valued and respected. We treat all individuals fairly, in all aspects of employment, without regard to race, color, national origin, ancestry, religion, sex, gender identity, pregnancy, marital status, actual or perceived sexual orientation, age, physical or mental disability, family care status, veteran status or medical condition, including genetic characteristics. For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need and is an EOE/D/V employer.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations not included here.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

The Human Resources Department manages employment resources and data to ensure Kingston's implementation and execution of our commitment to Integrity and Fairness in the company.

Description

Management approach is through broad and specific Human Resources policies and procedures that have been vetted to comply with employment laws in which Kingston operates to ensure it meets the company's CORE values. In addition, Kingston is a member of the Responsible Business Alliance (RBA) and adheres to their code of conduct. We also support and encourage our suppliers to this uphold this same standard. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to Human Resources: the CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on validation audits through the Responsible Business

Alliance (RBA) which include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

Human Resources, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, the Human Resources, CSRMC and its management approach remain valid.

GRI 405: Diversity and Equal Opportunity 2016

405-1: Diversity of governance bodies and employees

Diversity of governance bodies

Diversity categories for organization's governance bodies	Percentage
i. Gender: Male	26.0%
i. Gender: Female	74.0%
ii. Age group: under 30	29.0%
ii. Age group: 30-50	48.0%
ii. Age group: over 50	23.0%
Highest governance body	100.0

Percentage of employees per employee category in each of the following diversity categories:

Diversity categories for all employees	
Employee category	All employees
i. Gender: Male	41.0
i. Gender: Female	59.0
ii. Age group: under 30	21.2
ii. Age group: 30-50	67.4
ii. Age group: over 50	11.4

405-2: Ratio of basic salary and remuneration of women to men

Explanation for omission: Confidentiality Constraint (Privately held company)

Non-discrimination

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our employees to the upmost importance. Kingston operates in very diverse communities and serves a widely diverse customer base, and as such, Kingston strives to reflect these communities. We understand our employees are one of our top resources, which is why one of Kingston's core values is Respect for Each Other. This core value is Kingston's commitment to respecting each other including our employees, our customers, and our community.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston is committed to upholding a culture where diversity is valued and respected. We treat all individuals fairly, in all aspects of employment, without regard to race, color, national origin, ancestry, religion, sex, gender identity, pregnancy, marital status, actual or perceived sexual orientation, age, physical or mental disability, family care status, veteran status or medical condition, including genetic characteristics. For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need and is an EOE/D/V employer.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations not included here.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

The Human Resources Department manages employment resources and data to ensure Kingston's implementation and execution of our commitment to Integrity and Fairness in the company.

Description

Management approach is through Human Resources policies and procedures that have been vetted to comply with employment laws in which Kingston operates to ensure it meets the company's CORE values. In addition, Kingston is a member of the Responsible Business Alliance (RBA) and adheres to their code of conduct. We also support and encourage our suppliers to this uphold this same standard. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to Human Resources: the CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on validation audits through the Responsible Business Alliance (RBA) which include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

Human Resources, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, the Human Resources, CSRMC and its management approach remain valid.

GRI 406: Non-discrimination 2016

406-1: Incidents of discrimination and corrective actions taken

Explanation for omission:

Total number of incidents of discrimination during the reporting period: 0

As such, Kingston has not taken any corrective actions for the reporting year.

Freedom of Association and Collective Bargaining

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston always holds our employees to the upmost importance. We understand and respect the rights of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Employees are very important to the success of Kingston. As the President of our company has said in the past, we can replace all of our structures and products, but we cannot replace the minds of our employees, for without whom we would not be successful. As such, Kingston respects the rights of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

The Human Resources Department manages employment resources and data to ensure Kingston's implementation and execution of our commitment to respecting worker's rights in the company.

Description

Management approach is through broad and specific policies and procedures that have been vetted to comply with employment laws in which Kingston operates to ensure it meets the company's

commitment to employee rights, in addition to our CORE values. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to Human Resources: the CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on RBA VAP audits that include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, the Human Resources, CSRMC, and its management approach remain valid.

GRI 407: Freedom of Association and Collective Bargaining 2016

407-1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

Operations and/or suppliers

Manufacturing

Measures taken by the organization to support rights to exercise freedom of association and collective bargaining

In conformance with local law, Kingston shall respect the rights of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns openly with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Child Labor

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held employment and the types therein to the upmost importance. We understand employment with Kingston sets out the conditions of ensuring our employees are one of our top resources, which is why our Kingston's core values includes Investing in our Employees and Respect for Each Other. These core values are Kingston's commitment to the well-being of our employees, while ensuring respect through non-employment of child labor.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need. Child labor is not used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

At this time, Kingston’s reporting and measurement includes all employment under its control. Supply chain information is validated through VAP audits.

103-2: The management approach and its components

Kingston manages this topic through the CSRMC, utilizing external RBA VAP audits to report on performance towards this topic. These reports provide advice to the CSRMC, HR (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect employment and subcon actions.

Child labor issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The CSRMC is to provide input and advice on direction of employment management.

Description

Management approach is through broad and specific Human Resources and CSR policies and procedures that have been vetted to comply with employment laws in which Kingston operates to

ensure it meets the company's CORE values. Kingston has an active approach for the determent of child labor employment within subcons.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of employment practices that track and monitor progress of initiatives, and report results to the Compliance Manager and the CSRMC. Findings are reported out to Executives. External approaches are primarily focused on RBA VAP audits.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to child labor employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through company observations, and RBA VAP audits.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as observations and audit data becomes available, and processes and policies are developed from data received. Overall CSRMC and its management approach remain valid.

GRI 408: Child Labor 2016

408-1: Operations and suppliers at significant risk for incidents of child labor

a. Operations and suppliers considered to have significant risk for incidents of:

Operations and suppliers with significant risk for incidents of Child Labor

Subcon (manufacturer of specific component parts used in our products) and supplier

Operations and suppliers with significant risk for incidents of young workers exposed to hazardous work

Subcon (manufacturer of specific component parts used in our products) and supplier

b. Operations and suppliers considered to have significant risk for incidents of child labor either in terms of:

Operations and/or suppliers

i. Subcon (manufacturer of specific component parts used in our products) and supplier

Operations and/or suppliers

ii. China and Taiwan, although this risk in our business model continues to reduce due to scrutiny, focus, and improved economic opportunity for employees

c. Measures taken by the organization to contribute to the effective abolition of child labor

Internal and external mechanisms including VAP audits. Results are communicated to the Compliance Manager, CSRMC, and Executives. Decisions to contribute to the effective abolition of child labor are made based upon the data and findings.

Forced or Compulsory Labor

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held employment and the types therein to the upmost importance. We understand employment with Kingston sets out the conditions of ensuring our employees are one of our top resources, which is why our Kingston's core values includes Investing in our Employees and Respect for Each Other. These core values are Kingston's commitment to the well-being of our employees, while ensuring respect to forced or compulsory labor.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need. Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitive prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is validated through VAP audits.

103-2: The management approach and its components

Kingston manages this topic through the CSRMC, utilizing external RBA VAP audits to report on performance towards this topic. These reports provide advice to the CSRMC, HR (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect employment and subcon actions.

Forced and compulsory labor issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The CSRMC is to provide input and advice on direction of employment management.

Description

Management approach is through broad and specific Human Resources and CSR policies and procedures that have been vetted to at least comply with employment laws in which Kingston operates to ensure it meets the company's CORE values. Kingston has an active approach for the determent of forced and compulsory labor employment within subcons.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of employment practices that track and monitor progress of initiatives, and report results to the Compliance Manager and the CSRMC. Findings are reported out to Executives. External approaches are primarily focused on RBA VAP audits.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to forced and compulsory labor employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through company observations, and RBA VAP audits.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as observations and audit data becomes available, and processes and policies are developed from data received. Overall CSRMC and its management approach remain valid.

GRI 409: Forced or Compulsory Labor 2016

409-1: Operations and suppliers at significant risk for incidents of forced or compulsory labor

a. Operations and suppliers considered to have significant risk for incidents of forced or compulsory labor either in terms of:

i. Type of operation (such as manufacturing plant) and supplier;

ii. Countries or geographic areas with operations and suppliers considered at risk.

Operations and/or suppliers

- i. Subcon (manufacturer of specific component parts used in our products) and supplier

Operations and/or suppliers

ii. China and Taiwan, although this risk in our business model continues to reduce due to scrutiny, focus, and improved economic opportunity for employees.

b. Measures taken by the organization to contribute to the elimination of all forms of forced or compulsory labor

Internal and external mechanisms including VAP audits. Results are communicated to the Compliance Manager, CSRMC, and executives. Decisions that contribute to the elimination of all forms of forced or compulsory labor are made based upon the data and findings.

Security Practices

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our employees to the upmost importance. We understand our employees are one of our top resources, which is why one of Kingston's core values is Investing in our Employees. This core value is Kingston's commitment to the well-being of our employees, including their security.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For security, Kingston vets and hires security personnel and third-party vendors, it feels are the best fit for the security need.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through our General Affairs Department that reports and provides advice to Executives and the Board (as needed), EHS Department, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

Security resources, direction and data are managed through the General Affairs Department and rolled up to the Vice President of Administration to the Executives and the Board (as needed). EHS and the CSRMC are involved from an adjunct standpoint to provide input and advice on direction of employment management.

Description

Management approach is through broad and specific security procedures that have been vetted to at least comply with appropriate laws, while ensuring the security of our employees in which Kingston operates. Kingston has an active approach for security through internal and external resources.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of the systems that are to track and monitor progress of security issues and exposures, and report results to General Affairs. EHS and the CSRMC is involved as items are reported out to Executives.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the security process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

General Affairs, along with EHS and the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new data and experiences become available, and changes to procedures are developed from the data received.

GRI 410: Security Practices 2016

410-1: Security personnel trained in human rights policies or procedures

Percentage of security personnel who have received formal training in the organization's human rights policies or specific procedures and their application to security.

100.0%

Are training requirements also applied to third-party organizations providing security personnel

Yes

Rights of Indigenous Peoples

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

Kingston operates in very diverse communities and serves a widely diverse customer base, and as such, Kingston strives to reflect these communities. We understand the importance and respect the rights of indigenous peoples.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

N/A

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

The Human Resources Department manages employment resources and data to ensure Kingston's implementation and execution of our commitment to respecting worker's rights in the company.

Description

Management approach is through broad and specific policies and procedures that have been vetted to comply with employment laws in which Kingston operates to ensure it meets the company's commitment to employee rights, in addition to our CORE values. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to Human Resources: the CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on validation audits that include the review of CSR components. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, Human Resources, the CSRMC, and its management approach remain valid.

GRI 411: Rights of Indigenous Peoples 2016

411-1: Incidents of violations involving rights of indigenous peoples

Explanation for omission: Kingston understands the importance of the rights of indigenous peoples and is not aware of any operations in which indigenous rights are violated.

Human Rights Assessment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our employees to the upmost importance. Kingston operates in very diverse communities and serves a widely diverse customer base, and as such, Kingston strives to reflect these communities. Kingston is committed to upholding the protection of human rights of all workers.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China

- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston is committed to upholding the protection of human rights of all workers. We are committed to ensuring that we are not involved in any human rights violations and hold our suppliers and partners to this same high standard.

At this time, Kingston's reporting and measurement includes all employment under its control. While supply chain information is limited, we are committed to ensuring that we are not involved in any human rights violations and hold our suppliers and partners to the RBA standard.

103-2: The management approach and its components

Kingston manages this topic through Corporate Social Responsibility practices and policies. The CSR Management Committee (CSRMC) provides reports and advice to the Executives Board (as needed) for decision-making and strategies that affect our policies and actions on human rights. The CSRMC also provides internal training to inform employees on elements of human rights. Different departments help to execute the practices and policies put in place.

The purpose of the management approach is to protect the human rights of employees and those in our supply chain.

Description

Kingston's management approach is organized and follows the standards set up by the RBA to which we are audited. The audits validate our efforts and ensure we uphold our commitments. We align our practices with RBA's Code of Conduct, including human rights. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice. Kingston's suppliers are required to sign the Kingston Code of Conduct which is in alignment with the RBA. Kingston verifies human rights policies and practices within our supply chain through CSR supplier audits.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Internal sources including internal audits of systems that are in place to track and monitor compliance of our commitments, and report results to the CSRMC. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on validation audits that include the review of CSR components. The CSRMC meets 8 - 10 times annually, where the measured performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated commitments. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and commitments, has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, Kingston's management approach remains valid.

GRI 412: Human Rights Assessment 2016

412-1: Operations that have been subject to human rights reviews or impact assessments

a. Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.

Country	Percentage	Total number
United States of America	100	1
China	100	1
Ireland	100	1
United Kingdom	100	1
Taiwan	100	1

412-2: Employee training on human rights policies or procedures

Total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.

1671.0 hours

Percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations.

100.0%

412-3: Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

Total percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

0.0%

Total number of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

0

The definition used for 'significant investment agreements'.

Significant investment agreements: investment agreements and contracts that either moved the organization into a position of ownership in another entity, or initiated a capital investment project that was material to financial accounts

Local Communities

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

Kingston understands its role as a Global Citizen and strives to create positive impact in the communities in which we live, work, and serve. Kingston operates in very diverse communities and serves a widely diverse customer base. As such, Kingston strives to support and positively impact our local communities.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates: China Ireland Taiwan United Kingdom United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

At this time, Kingston's reporting and measurement includes all information under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations not included here.

103-2: The management approach and its components

Kingston manages this topic through a Corporate Social Responsibility Management Committee (CSRMC). The CSRMC reports data and helps to provide advice to Executives, the Board (as needed), and the Human Resources Department for decision-making and planning that affects the local community. The CSRMC also provides internal and external training to manage local community topics.

Description

Management approach is through policies and procedures that are aligned with the company's CORE values and commitments to positively impact the communities in which we live, work, and serve. Kingston strives to be the bridge that connects our employees to our global communities, so that together we can create, contribute, and cultivate a culture built for environmental and social impact. As a member of the Responsible Business Alliance (RBA), Kingston holds itself accountable to implement and maintain ethical practices as well as developing sustainable partnerships with local organizations. Kingston utilizes local community partnerships with the help of our employees to positively impact the communities in which we live, work, and serve. Employees are explicitly allowed to approach managers and Human Resources confidentially for any grievance without fear of reprisal, and this is reflected in policies, procedures and in practice. Kingston has specific guidelines to determine our actions with regard to local community efforts. Each community organization we partner with is vetted carefully - selected with care and intent to support holistic community growth.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include employee engagement, feedback from our employees, and internal audit results. External sources include community partner engagement, the local communities in which we operate, feedback from external stakeholders, and external audit results.

ii. The results of the evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include employee engagement, feedback from our employees, and internal audit results. External sources include community partner engagement, the local communities in which we operate, feedback from external stakeholders, and external audit results.

iii. Any related adjustments to the management approach.

The CSRMC and Human Resources meets with Executives to provide updates of internal and external evaluation results and address local community topics. An example, with regard to local communities, monitoring of relevant data has initiated independent reviews of the local community initiatives. An example, with regard to local environmental energy, monitoring of appropriate data has initiated solar panel installation for Fountain Valley production activities with the objective of energy usage reduction.

GRI 413: Local Communities 2016

413-1: Operations with local community engagement, impact assessments, and development programs

Percentage of operations with implemented local community engagement, impact assessments, and/or development programs

100.0%

Explanation

Kingston understands its role as a Global Citizen and strives to create positive impact in the communities in which we live, work, and serve. With the help of our employees, Kingston globally participates in endeavors to positively impact our local communities by partnering with local organizations to support holistic community growth. We believe in supporting the community through education to promote equity in the communities in which we live, work, and serve. Kingston has donated over \$1.5 million through monetary and in-kind donations and Kingston's employees have volunteered over 1,200 hours. Through our donations and volunteering efforts, we have supported over 120 community organizations and impacted over 30,000 individuals globally. Kingston collects and reports on our ongoing monitoring environmental process while using the Carbon Disclosure Project (CDP) as a framework. Results of ongoing monitoring are included in environmental assessments done to make goals and commitments to improve Kingston's impact on the environment.

413-2: Operations with significant actual and potential negative impacts on local communities

a. Operations with significant actual and potential negative impacts on local communities, including:

i. the location of the operations

Locations of operations: China, Ireland, Taiwan, United Kingdom, United States of America

ii. the significant actual and potential negative impacts of operations

Opportunities to add to the local job market and foster the under served areas in our local communities.

Supplier Social Assessment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

With several suppliers around the world, the management of Kingston's supply chain is held with high emphasis. The quality of our products, and of the suppliers who help to manufacture them, is important to Kingston as they play a large part of our promise to the customer to provide them with exceptional, top of the line technology products.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all Kingston locations and the locations of our suppliers:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Regarding our suppliers, Kingston, working through internal departments, vets and reviews, and audits suppliers for adherence to ethical, environmental, and health and safety standards.

Currently, Kingston's reporting and measurement of suppliers are validated through internal and certified third party audits.

103-2: The management approach and its components

Kingston manages the topic of suppliers through the CSRMC, along with our purchasing and procurement teams, by utilizing RBA VAP audits, internal vetting reports, and internal audits. These reports provide advice to the CSRMC, HR (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect purchasing, procurement, and supplier's actions.

Supplier management issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The CSRMC is to provide input and advice on direction of supplier management

Description

Management approach is through broad and specific CSR policies and procedures that have been vetted to comply with laws in which Kingston's suppliers operate. Kingston has an active approach in place to assess social impacts of its suppliers globally.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of suppliers that track and monitor progress of initiatives, and report results to the Compliance Manager and the CSRMC. Findings are reported out to Executives. External approaches are primarily focused on RBA VAP audits and internal supplier audits.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An objective for all global facilities for suppliers has been initiated through RBA VAP and internal audits.

iii. Any related adjustments to the management approach.

The CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as observations and audit data becomes available, and processes and policies are developed from data received. Overall CSRMC and its management approach remain valid.

GRI 414: Supplier Social Assessment 2016

414-1: New suppliers that were screened using social criteria

Percentage of new suppliers that were screened using social criteria.

100.0%

414-2: Negative social impacts in the supply chain and actions taken

Number of suppliers assessed for social impacts.

182.0

Number of suppliers identified as having significant actual and potential negative social impacts.

45.0

Significant actual and potential negative social impacts identified in the supply chain

We are not aware of any significant actual or potential negative social impacts in the supply chain. In order to mitigate any social impacts, our product compliance team monitors the materials, components and chemicals in each of our products and assesses them for their negative environmental impact.

Public Policy

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston understands political contributions may present potential risks of corruption. As such, Kingston does not contribute to nor affiliate itself with any political stances.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:ChinaIrelandTaiwanUnited KingdomUnited States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

While Kingston does not make any contributions to public policy, Kingston respects the rights of all workers to engage in public policy, as well as the right to refrain from such activities.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR supplier audits of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages the topic through Corporate Social Responsibility and Accounting policies and practices, as noted on our website through our Anti-Corruption and Foreign Corruption Practices Act policies and procedures. See <https://www.kingston.com/us/company/anti-corruption-policy>

Purpose of the management approach is to ensure that Kingston's relationship with all foreign governmental agencies and their officials and personnel in the U.S. and in each foreign country in which business is conducted shall be in all respects such that public disclosure of the full details thereof will not jeopardize Kingston's integrity or reputation. Kingston personnel shall conduct Company business in compliance with its Policy and the written laws of all countries in which the Company does business.

Description

The CSRMC and Accounting teams implement and maintain the management approach which includes policies and procedures that are in place. All Kingston Personnel must familiarize themselves with the specific terms of the Policy and Procedures. If any Kingston Personnel has any doubts as to the scope of applicable laws or needs more specific information, she/he should contact the Corporate Anti-Corruption Compliance Coordinator and/or the appropriate Regional Anti-Corruption Compliance Representative for guidance. Grievance mechanisms include contact channels which are responsible for informing the CSRMC and appropriate teams as needed.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Kingston utilizes internal and external audits as well as communication channel counts to evaluate the management approach.

ii. The results of the evaluation of the management approach

Results are based upon evaluation of the findings of the audits and communication channel counts.

iii. Any related adjustments to the management approach.

Adjustments are made through the CSRMC, Accounting, and any relevant management groups as results and information become readily available.

GRI 415: Public Policy 2016

415-1: Political contributions

a. Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.

Country	Recipient/beneficiary	Contribution
United States of America	N/A	0.0
Taiwan	N/A	0.0
China	N/A	0.0
Ireland	N/A	0.0
United Kingston	N/A	0.0

b. If applicable, how the monetary value of in-kind contributions was estimated.

Not applicable

Customer Health and Safety

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

With several diverse products, the management of Kingston's product safety is held in with extreme importance. The quality and safety of our products is important to Kingston as they play a large part of our promise to the customer to provide them with exceptional, top of the line technology products.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur in all regions where Kingston products are sold:

- Asia
- EU
- Oceania
- North America
- Central America
- South America
- Eastern Europe
- Middle East
- Africa

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Regarding the health and safety of the consumers, Kingston tests and verifies our products to ensure it is safe for the consumer.

All Kingston products are safety tested to ensure compliance and safety in the specific country it is sold in.

103-2: The management approach and its components

Kingston manages the topic of consumer health and safety through the product compliance team, along with our design engineering group, Technical Resources Group, and various compliance teams around the world, by performing safety testing, complying to applicable regulations, and performing design changes as needed. These activities provide advice to the product compliance team, our legal team (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect purchasing, procurement, and future projects.

Consumer health and safety issues are managed through the product compliance team and rolled up to the Vice President of Administration to the Executives and the Board (as needed). The product compliance team is to provide input and advice on direction of consumer health and safety management.

Description

Management approach is through safety laws and regulations applicable to all countries in which Kingston's products are sold. Kingston has an active approach for the assessment of the safety of its products.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

i. Evaluation of the management approach is made through internal and external sources. Internal sources include reviewing of applicable safety laws and regulations. Findings are reported out to design engineering and technical research groups. External approaches are primarily focused on safety certification performed by accredited labs.

ii. The results of the evaluation of the management approach

ii. The results of product safety testing indicate the system is working toward stated goals.

iii. Any related adjustments to the management approach.

iii. The product compliance team continues to drive direction of compliance in this area. Adjustments are made as observations as regulation changes become available, and processes and policies are developed from data received. Overall product compliance and its management approach remain valid.

GRI 416: Customer Health and Safety 2016

416-1: Assessment of the health and safety impacts of product and service categories

Percentage of significant product and service categories for which health and safety impacts are assessed for improvement.

100.0%

416-2: Incidents of non-compliance concerning the health and safety impacts of products and services

Incidents of non-compliance that relate to events in periods prior to the reporting period.

N/A

Statement if no non-compliance with regulations and/or voluntary codes identified

Kingston has not identified nor had any reported concerns or complaints with regards to this topic which has been brought to our attention.

Marketing and Labeling

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

With several diverse products, the management of Kingston's marketing and labeling of our products is carefully examined. The accuracy of the labeling and marketing of our products is important to Kingston as they play a large part of compliance process to ensure that we meet all applicable regulations and smooth market access.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur in all regions where Kingston products are sold:

- Asia
- EU
- Oceania
- North America
- Central America
- South America
- Eastern Europe
- Middle East
- Africa

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

Kingston's product compliance team, along with the relevant design packaging teams, help to create and review and implement product labels.

103-2: The management approach and its components

Kingston manages the topic of marketing and labeling through the product compliance team, along with our packaging teams, by reviewing all product labeling and packaging. These activities provide advice to the product compliance team, our legal team (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect current, and future projects.

Marketing and labeling issues are managed through the product compliance team and rolled up to the marketing managers to the Vice President of Administration (as needed), and to the Executives and the Board (as needed). The product compliance team is to provide input and advice on direction of marketing and labeling issues.

Description

Management approach is through broad and specific manufacturing engineering and product compliance policies and procedures that have been vetted to at least comply with product labeling regulations and standards in which Kingston operates to ensure it is in full compliance. Kingston has an active approach for the accuracy of all product and packaging labeling.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including reviewing of packaging and labels. Findings are reported out to packaging and marketing teams. External approaches are primarily focused on market surveillance performed by non-governmental organizations.

ii. The results of the evaluation of the management approach

The results of packaging and label reviews indicate the system is working toward stated goals.

iii. Any related adjustments to the management approach.

The product compliance team continues to drive direction of compliance in this area. Adjustments are made as observations and regulation changes becomes available, and processes and policies are developed from data received. Overall product compliance and its management approach remain valid.

GRI 417: Marketing and Labeling 2016

417-1: Requirements for product and service information and labeling

a. a. Whether each of the following types of information is required by the organization's procedures for product and service information and labeling:

i. The sourcing of components of the product or service

Yes

ii. Content, particularly with regard to substances that might produce an environmental or social impact

Yes

iii. Safe use of the product or service

Yes

iv. Disposal of the product and environmental or social impacts

Yes

v. Other

No

Percentage of significant product or service categories covered by and assessed for compliance with such procedures.

100.0%

417-2: Incidents of non-compliance concerning product and service information and labeling

a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labeling, by:

i. Incidents of non-compliance with regulations resulting in a fine or penalty

1

2.1.2 Incidents of non-compliance that relate to events in periods prior to the reporting period.

No incidents of non-compliance that relate to events in periods prior to the reporting period.

Statement if no non-compliance with regulations and/or voluntary codes identified

Kingston has not identified any non-compliance with regulations and/or voluntary codes.

Supplementary information beyond GRI reporting requirements

Kingston encountered one instance of non-compliance regarding the mis-labeling of a regulatory logo which resulted in a fine. The issue was quickly brought to the attention of the appropriate departments and resolved. There have been no further instances of mis-labeling.

417-3: Incidents of non-compliance concerning marketing communications

2.2.2 Incidents of non-compliance that relate to events in periods prior to the reporting period.

No incidents of non-compliance that relate to events in periods prior to the reporting period.

Statement if no non-compliance with regulations and/or voluntary codes identified

Kingston has not identified any non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship.

Customer Privacy

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held our customer's privacy to the upmost importance. We understand our customers privacy is important, which is why Kingston is committed to ensuring customer privacy, which includes an interactive Information Security Management System.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Management Information Systems Department, utilizing a validated and certified Information Systems Management System (ISMS), in conformance with ISO/IEC 27001.

Management approach is to ensure Kingston provides a secure environment that we are continually dedicated to, and consistently meet and exceed security standards.

Description

Management approach is through specific ISMS policies and procedures that have been implemented and at a minimum, comply with privacy laws in which Kingston operates to ensure it meets the company's CORE values. Kingston has an active approach for the identification of risks and exposures, and corrective action process. Our senior management and executives, along with the CSRMC receive regular reporting and provide strategic decision-making with regards to these efforts.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to the MIS department. The CSRMC is involved as items are reported out to Executives in management review. External approaches are primarily focused on validation audits for the ISO/IEC 27001. The CSRMC that meets 8 - 10 times annually, the measured and performance results are provided with discussion regarding any adjustments to be made from feedback.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to customer privacy, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process.

iii. Any related adjustments to the management approach.

MIS, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws, NGOs ISMS standard criteria changes, and experiences become available. Processes and policies are developed and modified from data received. Overall, the MIS, ISMS, and its management approach remain valid.

GRI 418: Customer Privacy 2016

418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data

a. Total number of substantiated complaints received concerning breaches of customer privacy, categorized by:

i. Complaints received from outside parties and substantiated by the organization

0

ii. Complaints from regulatory bodies

0

2.1. A substantial number of these breaches relate to events in preceding years

No

Statement if no substantiated complaints identified

Kingston has not identified any substantiated complaints.

Socioeconomic Compliance

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

As a global organization, Kingston has always held employment and the types therein to the upmost importance. We understand employment with Kingston sets out the conditions of ensuring our employees are one of our top resources, which is why our Kingston's core values includes Investing in our Employees and Respect for Each Other. These core values are Kingston's commitment to the well-being of our employees, while ensuring respect within socioeconomic requirements and expectations in the areas in which we operate.

b. The Boundary for the material topic, which includes a description of:

i. where the impacts occur

Impacts occur at all locations in which Kingston operates:

- China
- Ireland
- Taiwan
- United Kingdom
- United States of America

ii. The organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.

For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need. Kingston operates within equal opportunity employment guidelines and laws within the areas in which we operate.

At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is limited, based upon CSR observations of processes and conditions within their organizations.

103-2: The management approach and its components

Kingston manages this topic through a formal Human Resources Department that reports and provides advice to Executives and the Board (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.

Employment resources, direction and data are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executives and the Board (as needed).

The CSRMC is involved from an adjunct standpoint to provide input and advice on direction of employment management.

Description

Management approach is through broad and specific Human Resources policies and procedures that have been vetted to at least comply with appropriate socioeconomic-related employment laws and expectations in which Kingston operates to ensure it meets the company's CORE values.

103-3: Evaluation of the management approach

a. An explanation of how the organization evaluates the management approach, including:

i. The mechanisms for evaluating the effectiveness of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to Human Resources: the CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on VAP related audits from our customers.

ii. The results of the evaluation of the management approach

The results of external and internal audits and data collection indicate the system is working toward stated goals. An example, with regard to employment, monitoring of appropriate data coupled with CSR initiatives and goals has initiated independent reviews of the employment process. Also, an objective for all global facilities for employment with the supply chain has been initiated through independent observations and audits, using Kingston's management approach.

iii. Any related adjustments to the management approach.

Human Resources, along with the CSRMC continues to drive direction of CSR endeavors in this area. Adjustments are made as new information, laws and experiences become available, and processes and policies are developed from data received. Overall, the Human Resources, CSRMC and its management approach remain valid.

GRI 419: Socioeconomic Compliance 2016

419-1: Non-compliance with laws and regulations in the social and economic area

a. a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:

i. Total monetary value of significant fines.

0.0 USD

ii. Total number of non-monetary sanctions.

0.0

iii. Cases brought through dispute resolution mechanisms

0.0

Statement if no non-compliance with laws and regulations identified

Kingston has not identified nor had any reported concerns or complaints with regards to this topic which has been brought to our attention.

The context against which significant fines and non-monetary sanctions were incurred.

N/A

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