



# Kingston Technology 2021 GRI



website: [www.kingston.com](http://www.kingston.com)

## Kingston Technology 2021 GRI

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# GRI 102: GENERAL DISCLOSURES (2016)

## Organizational Profile

### 102-1: Name of the organization

Kingston Technology Corporation

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

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.

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

Kingston has significant operations in 5 countries:

- United States
- United Kingdom
- Ireland
- Taiwan
- China

### 102-5: Ownership and legal form

Privately held corporation

## 102-6: Markets served

Geographic locations where products and services are offered:

- United States, Canada, Argentina, Brazil, Chile, Colombia, Costa Rica, Mexico, Peru, 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, Australia, China, India, Taiwan, Vietnam, Hong Kong, Japan

Sectors served:

- Computers
- Technology Hardware

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

Total number of employees: 3399

Total number of operations: 5

Net Sales: 13970000000 USD

Total capitalization

Debt: 720000000 USD

Equity: 3700000 USD

Quantity of products or services provided: 323,000,000

## 102-8: Information on employees and other workers

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

Gender	Permanent	Temporary
Male	1462	83
Female	1691	163
<b>Total</b>	<b>3153</b>	<b>246</b>

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

Region	Permanent	Temporary
Ireland	26	0
USA	699	54
Taiwan	1208	15
UK	272	36
China	948	141
<b>Total</b>	<b>3153</b>	<b>246</b>

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

<b>Gender</b>	<b>Full-time</b>	<b>Part-time</b>
<b>Male</b>	1503	5
<b>Female</b>	1821	16
<b>Total</b>	3324	21

All data reported has been compiled through reports and no assumptions were made.

## 102-9: Supply chain

Kingston utilizes 182 direct suppliers to obtain components, manufacture, distribute, and package products. Majority of our suppliers provide product casing and packaging. The remainder of the suppliers provide product components that are used in the manufacture and assembly of Kingston products.

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

- i. There have been no significant changes in our locations of operations. There have been no significant changes in our locations of operations.
- 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. There have been no significant changes in the structure of our supply chain or relationships with suppliers. Kingston continually makes efforts to improve our supplier vetting process to Kingston's standards.

## 102-11: 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

Kingston 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

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

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.

John Tu and David Sun  
CEO and COO

### 102-15: 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 its 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 its operating centers, starting with the USA.

## Ethics and integrity

### 102-16: 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

i. 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/unitedstates/us/company/sustainability>).

Kingston has internal policies and procedures to respond confidentially to the nature of any issues that are brought forward.

ii. Kingston maintains accountability and grievance mechanisms which are available to both employees and external parties.

Should a report be received, Kingston has a process in place to investigate and take appropriate action.

## Governance

### 102-18: Governance structure

Vice President of Administration is in direct communication with the C-suite on Corporate Social Responsibility (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. Environmental Health and Safety (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.

Environmental Health and Safety (EHS) management committee reports to the Vice President of Administration and works in conjunction with the CSR Team in developing related risks, targets, and opportunities.

The Corporate Social Responsibility Management Committee (CSRMC), with the input of the Executive Board, is responsible for making decisions regarding economic, environmental, and social topics. Our Executive Board decides the direction and vision of Kingston's business.

The Compliance Manager manages day-to-day operations for the sustainability and corporate social responsibility elements of Kingston's daily business. It is through this department, and the Compliance Manager in particular, in which decision-making data is provided to the C-Suite officers and through which data for strategic planning through CSR Management Committee is provided and measured results are shared with the team through the EHS Management Committee.

### **102-19: Delegating authority**

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

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

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

Yes, appointed

b. Whether post holders report directly to the highest governance body.

Yes, direct report

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

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

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

- i. a combination of executive (Vice President of Administration) and non-executive (CSR and EHS Management Committees)
- ii. Independent of the executive committee, but reports through the Vice President of Administration to the Executive Committee
- iii. Average of 3 to 5 years
- iv. One individual responsible for administration functions for Kingston, not just CSR. All other members are responsible for CSR governance body functions.
- v. 77% Female; 23% Male
- vii. economic - very good; environmental - moderate; social - moderate
- viii. through CSR (i.e. community, environmental, etc.) and EHS Management Committee (i.e. employees)

## 102-23: Chair of the highest governance body

- a. Whether the chair of the highest governance body is also an executive officer in the organization.

Yes, the chair is an executive officer

- b. 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

- a. Kingston is a privately held company, therefore, executives and their direct reports are selected for representation to the Executive Committee, which holds authority for governance of the organization.
- b. Kingston is a privately held company. When selecting governance body members, Kingston considers expertise and experience relating to environmental and social topics. As a result, independence is not considered.

## 102-25: Conflicts of interest

- a. 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 committee through the Vice President of Administration, resulting in informed decisions that avoid conflicts of interest.

b. N/A

## **102-26: 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.

## **102-27: Collective knowledge of highest governance body**

Kingston's executive committee holds periodic meetings to discuss economic, environmental, and social topics, and receives updates from respective departments. Additionally, Kingston also holds regular Management Review meetings 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**

a. 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 third-party validated audits. Outcomes of these audits provide an indication of Kingston's governance body's performance and help set future direction.

b. 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.

c. No

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

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

The Executive Committee, along with the Vice President of Administration, manages environmental and social topics and processes, while the Vice President of Finance and Controller dictates economic topics and processes. Kingston considers consultative advice

from stakeholders (i.e., materiality survey, customer survey, etc.).

### **102-30: Effectiveness of risk management processes**

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 practices 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**

The Executive Committee meets periodically to review economic, environmental, and social topics and their impacts, risks and opportunities. Additionally, members from the executive committee attend regular management review meetings of the management systems that address these topics.

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

The CSR and EHS management committees are responsible to review and approve the organization's sustainability reports. The CSR and EHS management committees will consult with the Vice President of Administration to ensure that all material topics are covered.

### **102-33: Communicating critical concerns**

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.

### **102-34: Nature and total number of critical concerns**

a. A total of 4 critical concerns regarding working hours, occupational safety, and emergency preparedness has been communicated to the highest governance body. The highest governance body is receiving 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.

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

## 102-35: Remuneration policies

*Explanation for omission: Confidentiality Constraint*

## 102-36: Process for determining remuneration

*Explanation for omission: Confidentiality Constraint*

## 102-37: Stakeholders' involvement in remuneration

*Explanation for omission: Confidentiality Constraint*

## 102-38: Annual total compensation ratio

*Explanation for omission: Confidentiality Constraint*

## 102-39: Percentage increase in annual total compensation ratio

*Explanation for omission: Confidentiality Constraint*

# Stakeholder Engagement

## 102-40: List of stakeholder groups

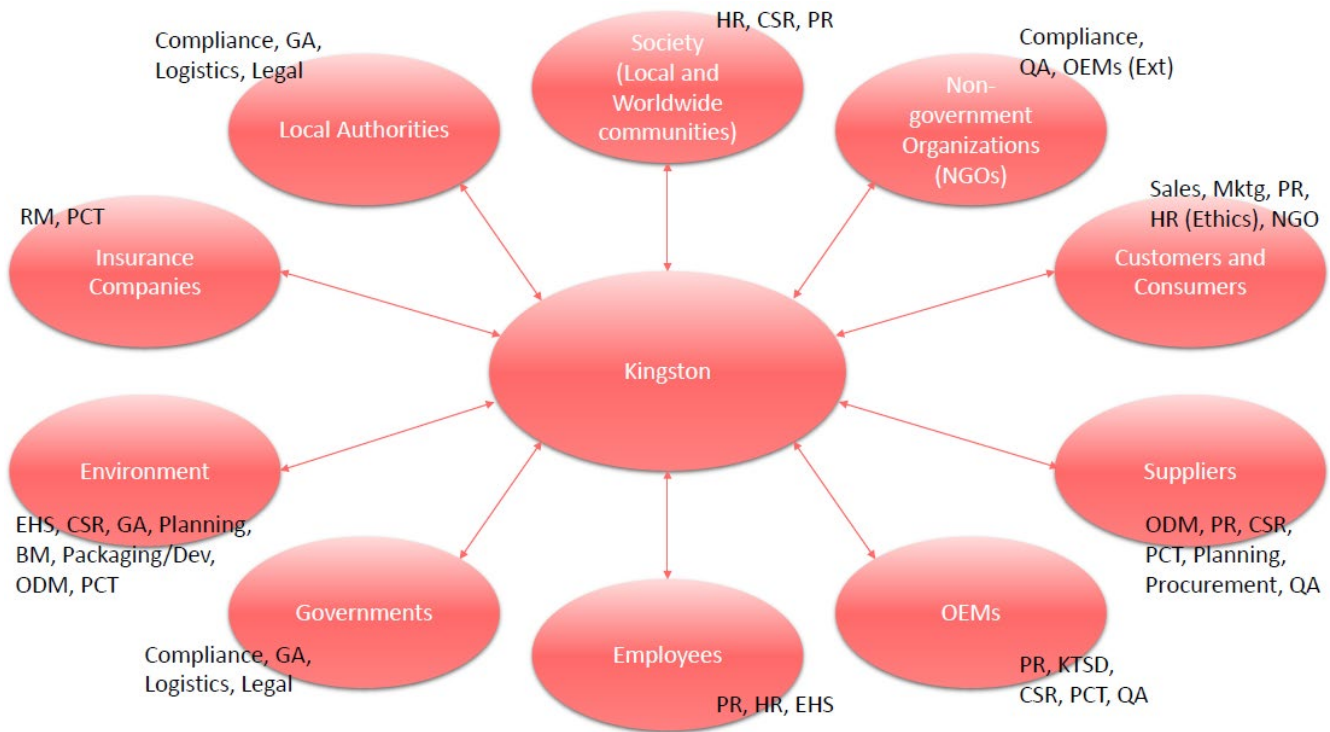
The following is a list of our stakeholders and Kingston Departments that handle them;

- 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
- Customers and 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



## 102-43: Approach to stakeholder engagement

The stakeholder groups can be engaged through multiple methodologies:

- Materiality Assessments to engage stakeholder groups
- 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
- Regularly scheduled audits to engage the NGO stakeholder groups depending on predetermined timelines
- 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

As the COVID-19 pandemic was an overarching topic of concern across stakeholders, Kingston has implemented internal processes to protect our employees and society while

ensuring business operations will continue to the best of our ability. Additionally, Kingston provides its stakeholders communication platforms to raise any key topics and concerns.

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 as a communication platform for employee stakeholder group.

The Townhall Meetings are utilized to share business updates, strategic plans, and an opportunity 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.

Environmental stakeholder group concerns are addressed through the Carbon Disclosure Project and GRI.

Social and Environmental Compliance Scorecard raised the need to answer to the customers' requests.

Key topics and concerns may also be raised through facility audits and self-assessment questionnaires.

## Reporting Practice

### 102-45: Entities included in the consolidated financial statements

a. 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

b. 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**

a. Kingston determines the topic boundaries through various methodologies for stakeholder engagement. Through that engagement, Kingston addresses its' environmental and social 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.

b. Through continual education on the material topics, Kingston continues to implement reporting principles for defining report content. Materiality assessment results continues to be taken into consideration as part of this reporting process.

## **102-47: List of material topics**

- Environmental topics: Materials, Energy, Water and Effluents, Emissions, Waste, 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, 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 2020

## **102-51: Date of most recent report**

12/2020

## **102-52: Reporting cycle**

Based on the Calendar Year.

## 102-53: Contact point for questions regarding the report

<b>Name</b>	Julia Durham
<b>Email</b>	Julia_Durham@Kingston.com
<b>Position</b>	Manager, Environmental Health and Safety & Sustainability Senior EHS Engineer
<b>Telephone</b>	714-427-3572

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

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

## 102-55: GRI content index

See pages 2-9 of Kingston Technology 2021 GRI

## 102-56: External assurance

a. 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, third-party validated audit processes that audit manufacturing processes, and other module certifications which are published on our website.

b. i. N/A: This report is not externally assured.

ii. N/A: This report is not externally assured.

iii. N/A: This report is not externally assured.

# 300 SERIES: ENVIRONMENTAL TOPICS

## GRI 301: Materials (2016)

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

a. 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. i. Impacts occur at all locations in which Kingston operates:

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

ii. 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 parts used in Kingston's products are components that are assembled as opposed to raw materials. Kingston has a Material Compliance team that ensures 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 Material Compliance team that ensures metals and chemicals used in our products can be recycled and disposed of safely and are acquired in a socially responsible manner.

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.

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**

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.

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

### **303-1: Materials used by weight or volume**

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.

### **303-2: 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.

### **303-3: Evaluation of the management approach**

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.

## GRI 302: Energy (2016)

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

- a. 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. i. The boundaries for the material topic are 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:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. 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. Solar panels have been installed on our manufacturing roof in Fountain Valley and will be turned on in the near future. This will make-up 70% of the needed energy for production.
- c. 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

- a. Kingston utilizes local Environmental Health and Safety (EHS) teams to discuss results, opportunities, and for decision-making regarding our energy usage and strategies that effect action.
- b. Energy data is monitored and compiled by the internal EHS & Sustainability teams using energy usage data and researched renewable energy mixes. Decisions such as the solar roof for the manufacturing building at one location are made based upon proposals from local facilities teams and EHS to upper management.
- c. 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

- i. 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 upper management through management review, and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO45001 and ISO 14001 certifications that include the review of CSR components. An executive board 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 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.
- iii. The EHS & Sustainability team continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received.

### 302-1: Energy consumption within the organization

Total fuel consumption fuel types used include Petrol gasoline, Diesel fuel and Natural gas:  
8.1441e+12 joules

Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used: 0.0 J

- i. Electricity consumption 1.808244e+12 J
- ii. Heating consumption 6.335856e+12 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 2021: 1.77046848e+14

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**

- a. 0.000152259
- b. Units produced
- c. Type of energy: Fuel, Electricity, Heating
- d. Within the organization

### **302-4: Reduction of energy consumption**

Kingston has completed a solar project involving the installation of solar panels. We anticipate reporting reductions achieved in the following year however, we have not yet realized the results of this project as of this reporting period.

### **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.

## **GRI 303: Water and Effluents (2018)**

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

- a. 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 the near future and create a baseline for future reporting.

b. i. Impacts occur at all locations in which Kingston operates:

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

ii. 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 EHS& Sustainability 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.

## **103-3: Evaluation of the management approach**

i. 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 upper management through management review, 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. An executive board 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 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.

iii. The EHS & Sustainability team continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received.

### 303-1: Interactions with water as a shared resource

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.

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 caused 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.

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.

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

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.

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.

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

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

128.61

Total water withdrawal from all areas in mega liters

128.61

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

125.01

Total water withdrawal from all areas with water stress in megaliters

125.01

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

128.61

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

15.16

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

111.44

Total water discharge to all areas in megaliters

128.6

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

128.6

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

125.01

Total water discharge to all areas with water stress in megaliters

125.01

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

128.6

Total water consumption from all areas with water stress

125.01

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

N/A - Kingston does not store water on site.

Kingston does not use any water intensive processes nor consumes water for product output. Water discharges are known through metering. While discharges to municipal treatment facilities are estimated with certainty.

## **GRI 305: Emissions (2016)**

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

- a. 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. i. 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.
- b. ii. 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.
- c. 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 an EHS management review 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 upper management through management review.

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**

- i. 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 upper management through management review, and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO45001 and ISO 14001 certifications that include the review of CSR components. An executive board 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 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.
- iii. The EHS & Sustainability team continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received.

### **305-1: Direct (Scope 1) GHG emissions**

- a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.  
430.69 metric tons
- 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.  
.9926 metric tons
- d. Base year for the calculation, if applicable, including:
  - i. Base year has been updated to 2012 when all global facilities were reported.
  - ii. 174.51 in metric tons of CO2 equivalent
  - iii. n/a
- e. 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. Operational control
- g. 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 CO<sub>2</sub> equivalent.

30132.76

- b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent: N/A

- c. If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all: CO<sub>2</sub>

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

ii. 24595.93

ii. 2012

iii. n/a

- e. 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. Operational control

- g. 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

- a. GHG Emissions intensity ratio (Scope 1)

0.00000133

Absolute GHG Emissions in metric tons (t) of CO<sub>2</sub> equivalent

430.69

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

323000000.00

GHG Emissions intensity ratio (Scope 2)

.00009329

Absolute GHG Emissions in metric tons (t) of CO<sub>2</sub> equivalent

30132.76

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

323000000.00

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

Number of units produced

c. Types of GHG emissions included in the intensity ratio

Direct (Scope 1)

Energy Indirect (Scope 2)

d. Gases included in the calculation

CO<sub>2</sub>

Supplementary information beyond GRI reporting requirements

The Scope 1 GHG emissions intensity ratio was calculated to be at 0.00000133 tonnes. The

Scope 2 GHG emissions intensity ratio was calculated to be at 0.00009329 tonnes.

### 305-5: Water consumption

Scope 1 reductions (in metric tons (t) of CO<sub>2</sub>)

0

Scope 2 reductions (in metric tons (t) of CO<sub>2</sub>)

0

Scope 3 reductions (in metric tons (t) of CO<sub>2</sub>)

0

Total 0

Offsets 0

Gases included in the calculation

- CO<sub>2</sub>

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

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

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:

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.

Solar panels have been installed in our Fountain Valley location and will be activated in the near future. Once activated, this photovoltaic system is anticipated to account for about 70% of the Fountain Valley energy needs. Activation of this system is thus estimated to reduce pull from the grid and will be considered in other locations. This project build has been completed and will be activated in the near future.

### **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**

- i. 0.0 m3
- ii. 0.0 m3
- iii. 0.0 m3
- iv. 0.0 m3
- v. 0.0 m3
- vi. 0.0 m3
- vii. 0.0 m3
- b. n/a
- c. n/a

## GRI 306: Waste (2020)

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

- a. Through utilization of the ISO 14001 Management system, Environmental aspects are identified and controlled while challenging our organization to consider our worldwide impacts. Kingston has started to look at business activities outside of our direct product manufacturing, including travel, packaging, and energy usage. We are looking to have baseline numbers by the end of 2021.
- b. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. Kingston utilizes the ISO 14001 Environmental management system as a guideline towards compliance with environmental regulations at each Kingston location.
- c. Kingston has not yet measured 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

Kingston utilizes an EHS management review 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 upper management through management review. 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

- i. 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 upper management through management review, and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO45001 and ISO 14001 certifications that include the review of CSR components. An executive board 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 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.
- iii. The EHS & Sustainability team continues to drive direction of CSR endeavors. Adjustments are made as new technologies become available, and processes and policies are developed from data received.

### **306-1: Waste generation and significant waste-related impacts**

- i. the inputs, activities, and outputs that lead or could lead to these impacts;

Our production processes, which primarily include receiving, packaging, and shipping of products and components, have been identified as a significant contributor to waste produced by Kingston. Though these processes are the most significant in waste production, the primary form of waste identified is cardboard, paper and plastic, all of which are recycled. Waste related to administrative aspects of the business have been identified as the primary contributor to non-recyclable waste but are a minimal contributor to the overall waste generated by Kingston.

- ii. whether these impacts relate to waste generated in the organization's own activities or to waste generated upstream or downstream in its value chain.

The impacts identified relate to waste generated by Kingston's own activities.

### **306-2: Management of significant waste-related impacts**

- a. Kingston uses a 5S business model that guides towards efficient processes that require an efficient and full collection of recyclable materials at every step of the production and shipping preparation processes. Within this system, all waste is collected and consolidated for pick up by third party recyclers. All products are recycled, and minimal waste is diverted to landfills. Our administrative processes are the primary generators of landfill directed waste.
- b. If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations. Validated through relevant credentials and manifests of the materials picked up by the third party.
- c. The processes used to collect and monitor waste-related data.

Direct measurements are taken from recycling and waste manifests and reports.

### 306-3: Waste generated

a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.

1013.09 metric tons

b. Contextual information necessary to understand the data and how the data has been compiled.

Direct measurements are taken from recycling and waste manifests and reports.

### 306-4: Waste diverted from disposal

a. Total weight of waste diverted from disposal in metric tons, and a breakdown of this total by composition of the waste: 823.65

b. Total weight of hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:

i. Preparation for reuse: n/a

ii. Recycling: 0.897

iii. Other recovery operations: N/A

c. Total weight of non-hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:

i. Preparation for reuse: N/A

ii. Recycling: 823.65

iii. Other recovery operations: N/A

d. For each recovery operation listed in Disclosures 306-4-b and 306-4-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste diverted from disposal:

i. onsite; 823.653

ii. offsite. .897

e. Contextual information necessary to understand the data and how the data has been compiled.

All waste diverted from disposal to landfills is retrieved by and measured using third-party vendors, who then provide manifests and reports on waste that is picked up from our facilities for disposal or recycling.

### 306-5: Waste directed to disposal

a. Total weight of waste directed to disposal in metric tons, and a breakdown of this total by composition of the waste.

189.44

b. Total weight of hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations:

i. Incineration (with energy recovery);

ii. Incineration (without energy recovery);

iii. Landfilling;

iv. Other disposal operations.

c. Total weight of non-hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations:

i. Incineration (with energy recovery);

ii. Incineration (without energy recovery);

iii. Landfilling; 189.44

iv. Other disposal operations.

d. For each disposal operation listed in Disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste directed to disposal:

i. onsite;

ii. offsite. 189.44

e. Contextual information necessary to understand the data and how the data has been compiled.

Direct measurements are taken from recycling and waste manifests and reports.

## GRI 307: Environmental Compliance (2016)

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

a. 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. i. Impacts occur at all locations in which Kingston operates:

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

- ii. Kingston utilizes the ISO 14001 Environmental management system as a guideline towards compliance with environmental regulations at each Kingston location.
- c. Kingston has not yet measured 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**

- a. 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, the EHS&S team is expected to help create Science based targets for ourselves and to help monitor environmental stewardship from our suppliers.
- b. 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.
- c. 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 worldwide. 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 its 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 companywide 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**

- i. 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 upper management through management review, and collection and monitoring of appropriate data for the initiative. External approaches are primarily focused on validation audits for the ISO45001 and ISO 14001 certifications that include the review of CSR components. An executive board 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 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. iii. The EHS & Sustainability team continues to drive direction of CSR endeavors. 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.

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

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

## **GRI 308: Supplier Environmental Assessment (2016)**

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

a. 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. i. The impacts occur at locations where Kingston products are manufactured and sold. ii. Kingston utilizes internal and external groups to audit and review suppliers for adherence to the RBA Code of Conduct. c. 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**

a. Kingston manages the topic of suppliers through supplier evaluations, 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 HR (as needed), and Executives and the Board (as needed), for decision-making and strategies that affect purchasing, procurement, and supplier's actions. b. Supplier management issues are managed through top management and rolled up to the Vice President of Administration to the Executives and the Board (as needed). c. 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. 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 relevant parties. Findings are reported out to Executives. External approaches are primarily focused on RBA VAP audits and CSR supplier audits. ii. 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. The Material Compliance Team 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.

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

a. Percentage of new suppliers that were screened using environmental criteria: N/A

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

Number of suppliers assessed for social impacts: 3

# 400 SERIES: SOCIAL TOPICS

## GRI 401: Employment (2016)

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

- a. 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.
- b. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need.
- c. 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

- a. Kingston manages this topic through a formal Human Resources Department that reports and provides advice to the Executive Committee (as needed), internal and external management training, and the CSR Management Committee (CSRMC) for decision-making and strategies that affect employment action.
- b. Employment resources, direction and data are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executive Committee (as needed). The CSRMC is involved from an adjunct standpoint to provide input and advice on direction of employment management.
- c. 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. 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. Kingston maintains grievance mechanisms which are available to employees.

### 103-3: Evaluation of the management approach

- i. Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.
- ii. The results of these evaluations indicate the approach is working toward stated goals. Identified corrective actions are addressed accordingly to ensure continual improvement in the relevant topics.
- iii. 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.

### 401-1: New employee hires and employee turnover

- a. Total number and rate of new employee hires during the reporting period, by age group, gender and region:

Region	New Hires	Under Age 30	Age 30-50	Over Age 50	Male	Female
USA	27	11 (41%)	13 (48%)	3 (11%)	17 (63%)	10 (37%)
UK	42	24 (57%)	18 (43%)	0 (0%)	22 (52%)	20 (48%)
Taiwan	79	54 (68%)	25 (32%)	0 (0%)	44 (56%)	35 (44%)
Ireland	4	2 (50%)	1 (25%)	1 (25%)	1 (25%)	3 (75%)
China	123	56 (46%)	66 (54%)	1 (1%)	35 (28%)	88 (72%)

- b. 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
USA	36	9 (25%)	18 (50%)	9 (25%)	18 (50%)	18 (50%)
UK	26	10 (38%)	13 (50%)	3 (12%)	18 (69%)	8 (31%)
Taiwan	62	22 (35%)	38 (61%)	2 (3%)	22 (35%)	40 (65%)
Ireland	3	0 (0%)	1 (33%)	2 (67%)	3 (100%)	0 (0%)
China	319	155 (49%)	164 (51%)	0 (0%)	51 (16%)	268 (84%)

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

Benefits provided to full-time employees include life insurance, health care, disability and invalidity coverage, parental leave, and retirement provision. Significant locations of operation include all locations in which Kingston operates.

### 401-3: Parental leave

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

Male	Female
753	1003

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

Male	Female
26	69

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

Male	Female
26	40

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:

Male	Female
15	33

e. Return to work rates of employees that took parental leave, by gender:

Male	Female
100%	58%

Retention rates of employees that took parental leave, by gender:

Male	Female
100%	94%

## GRI 402: Labor management relations (2016)

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

a. 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 Respect, Integrity and Fairness, and Investing in our Employees. These core values are Kingston's commitment to the well-being of our employees.

b. i. Impacts occur at all locations in which Kingston operates:

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

- ii. Employee relationships are very important to the success of Kingston. As such, management and labor relationships are continually monitored.
- c. 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**

- a. Kingston manages this topic through a Human Resources Department that reports to the Executive Committee and provides advice and training to relevant parties as needed.
- b. As Kingston holds our employees to the upmost importance, we understand the value of employee relationships. Thus, the purpose of our management approach is to ensure the well-being of our employees.
- c. 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. Kingston maintains grievance mechanisms which are available to employees. Kingston values employee relationships. Employment resources, direction and data are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executive Committee as needed.

### **103-3: Evaluation of the management approach**

- i. Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting to the Executive Committee. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.
- ii. The results of these evaluations indicate the approach is working toward stated goals. Identified corrective actions are addressed accordingly to ensure continual improvement in the relevant topics.
- iii. 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.

### **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.

## **GRI 403: Occupational Health and Safety (2018)**

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

a. 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. i. Impacts occur at all locations in which Kingston operates:

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

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

c. 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**

a. 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.

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

c. 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 EHS&S Team receive regular reporting and provide strategic decision-making with regards to these efforts.

### 103-3: Evaluation of the management approach

- i. 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. 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 executive board 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 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. EHS 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.

### 403-1: Occupational health and safety management system

a. Whether an occupational health and safety management system has been implemented: Yes. 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 17 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.

- i. Is the system implemented because of legal requirements? No
- ii. 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**

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. 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. 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.

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.

Globally, many policies are trained to all employees through Kingston's Environmental, Health and Safety Program and the CSR Procedures. 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. 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**

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**

a. 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.

b. 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**

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: Evaluation of the management approach**

a. 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

b. 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**

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

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: Evaluation of the management approach

- a. For all employees:
  - i. The number of fatalities as a result of work-related injury: 0
  - ii. The number of high-consequence work-related injuries (excluding fatalities): 4
  - iii. The number of recordable work-related injuries: 15
  - iv. The main types of work-related injury: Cuts, traffic
  - v. The number of hours worked: 6394123
  
- b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:
  - i. The number of fatalities as a result of work-related injury: 0
  - ii. The number of high-consequence work-related injuries (excluding fatalities): 0
  - iii. The number of recordable work-related injuries: 0
  - iv. The main types of work-related injury: 0
  - v. The number of hours worked: N/A
  
- c. 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. The work-related hazards that pose risks are sources of motion, rolling and pinching objects, electrical hazards, slips and falls, and sharp and falling objects. These identified hazards have not caused or contributed to high-consequence injuries due to preventative actions applied by Kingston Technology's risk assessment outcomes.
- d. This is an ongoing effort, processes and equipment for work equipment are not controlled via any of the hierarchy of controls.

## 403-10: Work-related ill health

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. For the reporting period, Kingston has not identified any fatalities or case of recordable work-related ill health for employees and workers who are not employees but whose work and/or workplace is controlled by the organization.

The work-related hazards that pose risks are noise, minor chemical exposure (dermal), operational process dust (only exposure is in one operation). The dust and noise hazards are controlled through engineering methods. Chemical exposures are controlled through engineering substitution and personal protective equipment. These identified hazards have not caused or contributed to high-consequence injuries due to preventative actions applied by Kingston Technology's risk assessment outcomes.

## GRI 404: Training and education (2016)

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

- a. 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. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. For training and education, Kingston provides opportunities and access to educational resources and educational reimbursement.
- c. 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

- a. Kingston manages this topic through various departments as training and education are relevant. Training needs may arise depending on regulatory requirements, operational changes, and opportunities for improvement found through our evaluation processes.

- b. As Kingston holds our employees to the upmost importance, we understand the value of employee training and education. Thus, the purpose of our management approach is to empower our employees through training and educational opportunities.
- c. Various department management continues to identify training needs and educational opportunities. Training needs are identified through regulatory requirements, operational changes, and opportunities for improvement found through our evaluation processes. Educational opportunities are encouraged and provided for all employees based upon topic relevancy and management approval.

### 103-3: Evaluation of the management approach

- i. 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 that employees successfully complete the training.
- ii. 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. 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.

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

Gender	Average Hours of Training
Male	22.26
Female	17.58

Employee Category	Average Hours of Training
Management	12.19
Professional/Technical	18.75
Sales	5.70
Clerical/Administrative	7.91
Production/Warehouse	25.69

## 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
- 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

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

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

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

Gender	Percentage of employees receiving regular performance and career development reviews
Male	84%
Female	84%

Employee Category	Percentage of employees receiving regular performance and career development reviews
Management	31%
Professional/Technical	50%
Sales	28%
Clerical/Administrative	27%
Production/Warehouse	53%

## GRI 405: Diversity and equal opportunity (2016)

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

- a. 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. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. Kingston treats 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.
- c. At this time, Kingston's reporting and measurement includes all employment under its control.

### 103-2: The management approach and its components

- a. Kingston manages this topic through a formal Human Resources Department that reports to the Executive Committee.
- b. As Kingston holds our employees to the upmost importance, we understand the value of our employees. Thus, the purpose of our management approach is to ensure all employees are treated with respect and fairness.
- c. Management approach is through Human Resources policies and procedures which meets the company's CORE values. Kingston maintains grievance mechanisms which are available to employees.

### 103-3: Evaluation of the management approach

- i. Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management

approach. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.

ii. The results of these evaluations may identify corrective actions or opportunities for improvement. Identified corrective actions are addressed accordingly to ensure continual improvement in the relevant topics.

iii. Adjustments are made to the management approach as new information, laws and experiences become available, and processes and policies are developed from data received.

## 405-1: Diversity of governance bodies and employees

### Governance Body

Gender	Percentage
Male	77%
Female	23%

### Employees

Category	Percentage
Male	45%
Female	55%
Age group: under 30	18%
Age group: 30-50	70%
Age group: over 50	12%

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

*Explanation for omission: Confidentiality Constraint*

## GRI 406: Non-discrimination (2016)

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

a. 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. i. Impacts occur at all locations in which Kingston operates:

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

ii. Kingston treats all individuals fairly, including our employees, our customers, and our community, 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.

c. At this time, Kingston's reporting and measurement includes all employment under its control.

## **103-2: The management approach and its components**

a. Kingston manages this topic through a formal Human Resources Department that reports to the Executive Committee and provides advice and training to relevant parties as needed.

b. The purpose of the management approach is to provide a safe working environment free of discrimination.

c. 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 and procedures.

## **103-3: Evaluation of the management approach**

i. Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.

ii. The results of these evaluations may identify corrective actions or opportunities for improvement. Identified corrective actions are addressed accordingly to ensure continual improvement in the relevant topics.

iii. Adjustments are made to the management approach as new information, laws and experiences become available, and processes and policies are developed from data received.

## 406-1: Incidents of discrimination and corrective actions taken

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

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

## GRI 407: Freedom of Association and Collective Bargaining (2016)

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

a. 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. i. Impacts occur at all locations in which Kingston operates:

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

ii. Employees are very important to the success of Kingston. 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.

c. At this time, Kingston's reporting and measurement includes all employment under its control.

### 103-2: The management approach and its components

a. Kingston manages this topic through the CSR Management Committee (CSRMC) that reports to the Executive Committee as needed.

b. The purpose of the management approach is ensure a workforce free of harassment and unlawful discrimination.

c. Management approach is through policies and procedures which comply with employment laws in which Kingston operations 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 and procedures.

### 103-3: Evaluation of the management approach

- i. Evaluation of the management approach is made through internal and external sources. Internal sources include controlled policies and procedures as well as a formal Human Resources department which reports to the Executive Committee as needed. External approaches are primarily focused on third-party validated audits for the relevant topics.
- ii. The results of these evaluations may identify corrective actions or opportunities for improvement. Identified corrective actions are addressed accordingly to ensure continual improvement in the relevant topics.
- iii. Adjustments are made to the management approach as new information, laws and experiences become available, and processes and policies are developed from data received.

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

- a. Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk: Manufacturing
- b. 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.

## GRI 408: Child Labor (2016)

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

- a. As a global organization, Kingston has always held employment and the types therein to the utmost importance. Kingston is committed to the well-being of our employees, while ensuring ethical employment practices.
- b. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. For employment, Kingston seeks, interviews, vets and hires employees that are best fit for the position. Through ethical employment practices, child labor is not used in any stage of

manufacturing or any other operations. 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.

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

### **103-2: The management approach and its components**

a. Kingston manages this topic through the CSRMC, utilizing third-party validated audits to report on performance towards this topic. These reports provide advice to the CSRMC, HR (as needed), and Executive Committee (as needed), for decision-making and strategies that affect employment and subcon actions.

b. Child labor issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of employment management regarding child labor.

c. Management approach is through HR and CSR policies and procedures that have been vetted to comply with employment laws in which Kingston operates. Kingston has an active approach for the determent of child labor employment within our supply chain.

### **103-3: Evaluation of the management approach**

i. Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.

ii. Child labor issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of employment management regarding child labor.

iii. 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.

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

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

- ii. Subcon (manufacturer of specific component parts used in our products) and supplier
- b. i. Subcon (manufacturer of specific component parts used in our products) and supplier
- ii. While the locations of our operations are not identified through the ILO as at risk for child labor, we continue to mitigate significant risk for incidents of child labor.
- c. Internal and external mechanisms including third-party validated 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.

## **GRI 409: Forced or Compulsory Labor (2016)**

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

- a. As a global organization, Kingston has always held employment and the types therein to the utmost importance. Kingston is committed to the well-being of our employees, while ensuring ethical employment practices.
- b. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. For employment, Kingston seeks, interviews, vets and hires employees that are best fit for the position. Through ethical employment practices, forced or compulsory labor is not used in any stage of manufacturing or any other operations.
- c. At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is validated through third-party validated audits.

### **103-2: The management approach and its components**

- a. Kingston manages this topic through the CSRMC, utilizing third-party validated audits to report on performance towards this topic. These reports provide advice to the CSRMC, HR (as needed), and Executive Committee (as needed), for decision-making and strategies that affect employment and subcon actions.
- b. Forced or compulsory labor issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of employment management regarding forced or compulsory labor issues.
- c. Management approach is through HR and CSR policies and procedures that have been vetted to comply with employment laws in which Kingston operates. Kingston has an active approach for the determent of forced or compulsory labor employment within our supply chain.

### 103-3: Evaluation of the management approach

- a. i. Evaluation of the management approach is made through internal and external sources. Internal sources include monitoring and reporting of this management approach. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.
- ii. Forced or compulsory labor issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of employment management regarding forced or compulsory labor.
- iii. 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.

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

- a. As we utilize suppliers in various geographic areas, we continue to monitor the risk of forced or compulsory labor through our due diligence mechanisms. Currently, we have not identified any operations or suppliers at significant risk for incidents of forced or compulsory labor.
- b. Internal and external mechanisms including third-party validated 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.

## GRI 410: Security Practices (2016)

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

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

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

- a. Kingston manages this topic through our General Affairs Department that reports and provides advice to Executives and the Board (as needed), EHS Department and HR Department for decision-making and strategies that affect employment action.
- b. 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 HR are involved from an adjunct standpoint to provide input and advice on direction of employment management.
- c. 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**

- i. 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 HR is involved as items are reported out to Executives.
- ii. 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. General Affairs, along with EHS and the HR 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.

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

- a. 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%
- b. Whether training requirements also apply to third-party organizations providing security personnel: Yes

## GRI 412: Human Rights Assessment (2016)

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

- a. As a global organization, Kingston has always held employment and the types therein to the utmost importance. Kingston is committed to upholding the protection of human rights of all workers.
- b. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. 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.
- c. At this time, Kingston's reporting and measurement includes all employment under its control. Supply chain information is validated through third-party validated audits.

### 103-2: The management approach and its components

- a. Kingston manages this topic through the CSRMC, utilizing third-party validated audits to report on performance towards this topic. These reports provide advice to the CSRMC, HR (as needed), and Executive Committee (as needed), for decision-making and strategies that affect human rights.
- b. Human rights issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of employment management regarding human rights issues.
- c. Management approach is through HR and CSR policies and procedures that have been vetted to comply with employment laws in which Kingston operates. Kingston has an active approach for the determent of human rights violations within our supply chain.

### 103-3: Evaluation of the management approach

- i. Evaluation of the management approach is made through internal and external sources. Internal sources include monitoring and reporting of this management approach. The CSRMC is involved as items are reported out to Executives. External approaches are primarily focused on third-party validated audits for the relevant topics.
- ii. Human rights issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of employment management regarding human rights.
- iii. 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.

### 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
USA	100%	1
UK	100%	1
Taiwan	100%	1
Ireland	100%	1
China	100%	1

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

- a. 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: 1576.5
- b. 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%

## GRI 413: Local Communities (2016)

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

- a. 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. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. Kingston contributes to its local communities as needs are determined in each region.
- c. At this time, Kingston's reporting and measurement includes all information under its control.

### 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 Committee as needed, and the Human Resources Department for decision-making and planning that affects the local community.

Management approach is through employee engagement opportunities 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. 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

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

- ii. Evaluation of the management approach is made through internal and external sources. Internal sources include employee engagement and feedback from our employees. External sources include community partner engagement, the local communities in which we operate and feedback from external stakeholders.
- iii. The CSRMC and Human Resources meets with Executives to provide updates as needed.

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

- a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programs: 100%

Kingston understands its role as a Global Citizen and strives to create positive change whenever we can. With the help of our employees, Kingston participates in endeavors to improve the communities in which we operate 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 work, serve, and live. Kingston has donated over \$1.5 million through monetary and in-kind donations. 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**

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

Due to the above operational facilities, potential negative environmental impacts may pose a risk. However, Kingston collects and reports on our ongoing monitoring environmental process while using the Carbon Disclosure Project (CDP) and Global Reporting Initiative (GRI) reporting platforms. Results of ongoing monitoring are included in environmental assessments

done to make goals and commitments to improve Kingston's impact on the environment and mitigate potential negative impacts on the local communities.

## **GRI 414: Supplier Social Assessment (2016)**

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

- a. 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. i. Impacts occur at all locations in which Kingston operates:  
United States of America, United Kingdom, Taiwan, Ireland, China
- ii. Regarding our suppliers, Kingston, working through internal departments, vets and reviews, and audits suppliers for adherence to ethical, environmental, and health and safety standards.
- c. Currently, Kingston's reporting and measurement of suppliers are validated through internal and third-party validated audits.

### **103-2: The management approach and its components**

- a. Kingston manages the topic of suppliers through the CSRMC, along with our purchasing and procurement teams, by utilizing third-party validated audits, internal vetting reports, and internal audits. These reports provide advice to the CSRMC, HR as needed, and the Executive Committee as needed, for decision-making and strategies that affect purchasing, procurement, and supplier's actions.
- b. Supplier management issues are managed through the CSRMC and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is to provide input and advice on direction of supplier management.
- c. Management approach is through CSR policies and procedures that have been vetted to comply with laws in which Kingston's suppliers operate. Kingston continues to further develop its approach to assess social impacts of its suppliers globally.

### **103-3: Evaluation of the management approach**

- i. 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 the Executive Committee as needed. External approaches are primarily focused on third-party validated audits and internal supplier audits.

ii. 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 third-party validated audits and internal audits.

iii. 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.

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

a. Percentage of new suppliers that were screened using social criteria: N/A

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

Number of suppliers assessed for social impacts: 3

### **GRI 415: Public Policy (2016)**

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

a. 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. i. Impacts occur at all locations in which Kingston operates:

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

ii. 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.

c. 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

a. 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>

b. 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.

c. 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

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

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

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

## 415-1: Political contributions

Kingston has not made any monetary or in-kind political contributions.

## GRI 416: Customer Health and Safety (2016)

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

- a. 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. i. Impacts occur where all our products are sold and marketed to:  
Asia, EU, Oceania, North America, Central America, South America, Eastern Europe, Middle East, Africa
- ii. Regarding the health and safety of the consumers, Kingston tests and verifies our products to ensure it is safe for the consumer.
- c. 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

- a. 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.
- b. 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.
- c. Management approach is through broad and specific 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

- 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 product safety testing indicate the system is working toward stated goals.
- 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.

### **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 in terms of product compliance: 100%

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

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

## **GRI 417: Marketing and Labeling (2016)**

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

- a. 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. i. Impacts occur where all our products are sold and marketed to:  
Asia, EU, Oceania, North America, Central America, South America, Eastern Europe, Middle East, Africa
- ii. 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

- a. 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.
- b. 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.
- c. 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

- i. 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 packaging and label reviews indicate the system is working toward stated goals.
- iii. 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.

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

- 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
- b. 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**

Kingston has not identified any non-compliance with regulations and/or voluntary codes concerning product and service information and labeling.

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

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

# **GRI 418: Customer Privacy (2016)**

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

- a. 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. i. Impacts occur at all locations in which Kingston operates:  
China, Ireland, Taiwan, United Kingdom, United States of America
- ii. For employment, Kingston seeks, interviews, vets and hires employees it feels are the best fit for the position need.
- c. At this time, Kingston's reporting and measurement includes all employment and operations under its control.

## 103-2: The management approach and its components

- a. Kingston manages this topic through a formal Management Information Systems (MIS) Department, utilizing a validated and certified Information Systems Management System (ISMS), in conformance with ISO/IEC 27001.
- b. Management approach is to ensure Kingston provides a secure environment that we are continually dedicated to, and consistently meet and exceed security standards.
- c. Management approach is through specific ISMS policies and procedures that have been implemented and comply with privacy laws in which Kingston operates. Kingston has an active approach for the identification of risks and exposures, and corrective action process.

## 103-3: Evaluation of the management approach

- a. i. 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. External approaches are primarily focused on validation audits for the ISO/IEC 27001.
- ii. The results of external and internal audits and data collection indicate the system is working toward stated goals.
- iii. MIS continues to drive direction of 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.

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

Kingston has not identified any substantiated complaints concerning breaches of customer privacy and losses of customer data.

## GRI 419: Socioeconomic Compliance (2016)

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

- a. As a global organization, Kingston understands the importance of socioeconomic compliance and hold ourselves accountable to ensure compliance within this material topic.
  - b. i. Impacts occur at all locations in which Kingston operates:  
China, Ireland, Taiwan, United Kingdom, United States of America

- ii. For socioeconomic compliance, Kingston holds ourselves accountable to socioeconomic compliance and ensures compliance with relevant guidelines, laws, and regulations within the areas in which we operate.
- c. At this time, Kingston's reporting and measurement for this topic includes all facilities and relevant socioeconomic compliance requirements under its control.

### **103-2: The management approach and its components**

- a. Kingston manages this topic through its Human Resources Department and CSR Management Committee (CSRMC) that reports and provides advice to the Executive Committee as needed.
- b. Employment resources, direction and data are managed through the Human Resources Department and rolled up to the Vice President of Administration to the Executive Committee as needed. The CSRMC is involved from an adjunct standpoint to provide input and advice on direction of socioeconomic compliance topics.
- c. Management approach is through policies and procedures that have been vetted to comply with appropriate socioeconomic-related employment laws and expectations in which Kingston operates.

### **103-3: Evaluation of the management approach**

- a. i. Evaluation of the management approach is made through internal and external sources. Internal sources include internal policies and procedures. External approaches are primarily focused on third-party validated audits.
- ii. The results of the evaluation of the management approach are reported to the VP of Administration and the Executive Committee as needed.
- iii. 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.

### **419-1: Non-compliance with laws and regulations in the social and economic area**

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