

Kingston Technology 2022 GRI



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www.kingston.com

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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

From big data, to laptops and PCs, to IoT-based devices like smart and wearable technology, to design-in and contract manufacturing, Kingston helps deliver the solutions used to live, work and play. The world's largest PC makers and cloud-hosting companies depend on Kingston for their manufacturing needs, and our passion fuels the technology the world uses every day. Kingston also provides inventory management and testing services. As of June 2021, Kingston has sold 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)
- 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.

To learn more about the divisions of Kingston, see here.

102-3: Location of headquarters

17600 Newhope St. Fountain Valley, CA 92708

102-4: Location of operations

Kingston has significant operations in 5 locations:

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

102-5: Ownership and legal form

Privately held corporation

102-6: Markets served

Kingston products and services are distributed to over 175 locations. Regions include:

 North America, Latin America, Europe, Eastern Europe, Middle East, Africa, Asia-Pacific

To see a complete list of locations served, see here.

Sectors served include but are not limited to:

• Electronics, Automotive, Machinery and equipment, Media and communication, Software, Household durables, Medical equipment and services, Retail, Commercial services, Non-profit organizations

Types of customers and beneficiaries:

- End User/Individual Consumers/Home/Enthusiast (Retail)
- OEM, ODM, Government, Medical Science, and Technology

102-7: Scale of the organization

Total number of employees: 2931 Total number of operations: 5 Net Sales: 16100000000 USD

Total capitalization

Debt: 2000000000 USD Equity: 430000000 USD

Quantity of products or services provided: 408000000

102-8: Information on employees and other workers

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

| Gender | Permanent | Temporary |
|--------|-----------|-----------|
| Male | 1253 | 60 |
| Female | 1517 | 101 |
| Total | 2770 | 161 |

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

| Region | Permanent | Temporary |
|---------|-----------|-----------|
| Ireland | 26 | 0 |
| USA | 624 | 32 |
| Taiwan | 1190 | 10 |
| UK | 218 | 29 |
| China | 712 | 90 |
| Total | 2770 | 161 |

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

| Gender | Full-time | Part-time |
|--------|-----------|-----------|
| Male | 1250 | 2 |
| Female | 1511 | 6 |
| Total | 2761 | 8 |

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

102-9: Supply chain

Kingston utilizes 194 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

There have been no significant changes in our locations of operations.

As of June 2021, Kingston has sold the HyperX line of gaming peripherals.

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 is certified to multiple ISO management systems which help manage risk for the organization and is a member of the Responsible Business Alliance (RBA) which is dedicated to corporate social responsibility in global supply chains.

To see a complete list of global ISO management certificates, see here.

102-12: External initiatives

Kingston products are designed and tested to meet appropriate standards where they are sold to ensure everyone enjoys Kingston products when used for their intended purposes.

To learn more about Kingston's product compliance, see here.

Kingston has committed to adopting the RBA Code of Conduct which establishes standards to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible.

To learn more about Kingston's Code of Conduct, see here.

102-13: Membership of associations

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

- JEDEC
- SD Association
- PCI-SIG
- USB Implementers Forum, Inc.
- NVM Express, Inc.
- RBA

Strategy

102-14: Statement from senior decision-maker

Our philosophy has been, if we take care of our employees and vendors, they will take care of our customers. This hasn't changed and we believe these values are the key to Kingston's success.

We believe the formula for business success is built around outstanding relationships as well as quality products. Our business is strengthened by long-term partnerships with suppliers, business partners, resellers and distributors. We strive to go above and beyond for corporate and consumer customers in service and support.

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.

Ethics and integrity

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

Our people are at the heart of Kingston's success. From the beginning, John and David focused on creating an environment where people could come together, work hard and have fun. They modeled the values of respect, fairness and flexibility as Kingston's standards of conduct. As new employees and global offices join the Kingston family, our core values continue to be passed along:

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

Kingston's Legal and Human Resources (HR) departments are responsible for providing advice regarding ethical and lawful behavior. Independent legal counsel 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 here. Kingston has internal policies and procedures to respond confidentially to the nature of any issues that are brought forward.

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 (VP) 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 VP of Administration on risks, objectives, targets, and performance, on said targets.

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

The Corporate Social Responsibility Management Committee (CSRMC) is responsible for supporting the Executive Board, which makes decisions regarding economic, environmental, and social topics.

The Environmental, Health & Safety and Sustainability (EHSS) Manager manages day-to-day operations for the environmental, health and safety and sustainability elements of Kingston's daily business. This department provides data to the C-Suite officers who make decisions regarding sustainability topics.

102-19: Delegating authority

The Executive Committee delegates authority to CSRMC and relevant groups to address economic, environmental, and social topics.

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

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

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 assess stakeholders on economic, environmental, and social topics.

The Executive Committee has delegated to the VP of Administration, which utilizes the CSRMC, 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

The highest governance body and its committees are a combination of executive and non-executive employees.

Independent of the Executive Committee, but reports through the VP of Administration to the Executive Committee

Average of 8 to 9 years

One individual responsible for administration functions for Kingston, including CSR. All other members are responsible for CSR governance body functions.

65% Female; 35% Male

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

Through responsible groups (CSRMC, EHS Management Committee, etc.) who communicate with stakeholders regarding their needs and expectations

102-23: Chair of the highest governance body

The chair of the highest governance body, the VP of Administration, is an executive officer. The VP is in direct communication with the C-suite on CSR issues, opportunities, and decision making. CSRMC reports directly to the VP of Administration on risks, objectives, targets, and performance, on said targets.

EHS management committee also reports to the VP 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

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.

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

Kingston has dedicated support teams 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 C-Suite through the appropriate representative on the Executive Committee, resulting in informed decisions that avoid conflicts of interest.

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

Kingston's Mission Statement is formulated by the Executive Committee and C-Suite. This sets up the values and purpose of the organization from which Kingston's policies and procedures are developed. The VP 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 VP of Finance and the Controller. The International Organization for Standardization (ISO) procedures set the framework for the company's strategy and policy with goals set and reviewed annually by

the VP of Administration. Responsible teams roll out the policies and procedures for implementation.

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 EHS, Sustainability and ISO topics with the VP of Administration, and other applicable departments.

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

The processes used for evaluating the performance of the highest governance body includes internal audits, external audits from third-party certified frameworks, and self-reporting disclosure mechanisms. These include ISO systems, 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. External evaluations are all independent third-party evaluations. These occur on an annual basis.

All corrective actions identified during the evaluation process are addressed in a timely manner. This may include changes in membership and organizational practice.

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

The Executive Committee, along with the VP of Administration, manages environmental and social topics and processes, while the VP of Finance and the Controller dictates economic topics and processes. Kingston considers stakeholders' needs and expectations when making decisions regarding economic, environmental, and social impacts.

102-30: Effectiveness of risk management processes

Kingston's VP 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. Topics include internal issues such as cost, account management, financials, investments, and customer expectations.

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 VP 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 total of 2 critical concerns regarding working hours has been communicated to the highest governance body.

To address and resolve critical concerns, Kingston uses risk assessments, auditing, and corrective action mechanisms. For the critical concerns reported above, 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 these critical concerns and do not expect these to reoccur.

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:

- Local Authorities
- Insurance Companies
- Environment
- Governments
- Employees
- Original Equipment Manufacturers
- Suppliers
- Customers and Consumers
- Non-Government Organizations
- Society

102-41: Collective bargaining agreements

Percentage of total employees covered by collective bargaining agreements: 0.0%

102-42: Identifying and selecting stakeholders

Kingston has identified and engages with all stakeholders listed below:

- Employees
- Customers and Consumers
- OEMs
- Suppliers
- Environment
- Insurance Companies
- Society (Local and Worldwide)
- Governments
- Local Authorities
- Non-Governmental Organizations (NGOs)

These groups may significantly affect or be affected by our activities, products and services.

102-43: Approach to stakeholder engagement

The stakeholder groups can be engaged through multiple methodologies:

- Open communication channels and the Employee Suggestion Program engage the employee stakeholder group
- 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

- 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 assessments of environmental aspects to reduce GHG emissions engage the environmental 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.

Reporting Practice

102-45: Entities included in the consolidated financial statements

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

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

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

102-46: Defining report content and topic Boundaries

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

Through continual education on the material topics, Kingston continues to implement reporting principles for defining report content. Materiality assessment results continue 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 2021

102-51: Date of most recent report

06/2021

102-52: Reporting cycle

Based on the Calendar Year

102-53: Contact point for questions regarding the report

| Name | Julia Durham |
|-----------|---|
| Email | Julia_Durham@Kingston.com |
| Position | Manager, Environmental, Health, Safety & Sustainability Senior EHS Engineer |
| Telephone | 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 2022 GRI

102-56: External assurance

Kingston Technology uses NGO third-party certification validation companies (i.e., SGS). External assurance is through auditing requirements (i.e., Quality, EHS, ISMS), audits conducted by OEMs, third-party validated audit processes that audit manufacturing processes, and other module certifications which are published on our website. This report is not externally assured.

300 SERIES: ENVIRONMENTAL TOPICS

GRI 301: Materials (2016)

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

With several diverse products, the management of Kingston's product material is held 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.

Impacts occur at all locations in which Kingston operates:

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

Kingston is aware of the direct environmental impacts of the materials used in our business models. We have processes in place to mitigate risk of depleting natural resources and raw materials. Kingston ensures materials used in our products can be recycled and disposed of safely. All Kingston products are designed and tested to meet appropriate standards where they are sold to minimize the impacts on the environment and ensure the health and safety of the consumer.

At this time, Kingston's reporting and measurement includes all elements under its control. Kingston has programs in place to ensure ethical sourcing practices up our supply chain.

103-2: The management approach and its components

Kingston manages the topic through a dedicated team who is responsible for ensuring materials used in Kingston's products are safe, sustainably sourced and free of conflict minerals. This also includes appropriate disposal of materials used in our products. The management approach for materials includes commitments, policies, procedures and programs in place. For more information about Kingston's product compliance, see here.

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 sources are primarily focused on safety certification performed by accredited labs.

The results of product safety testing indicate the system is working toward stated goals. Adjustments to the management approach are made as observations and regulation changes. New or revised processes and policies are developed from data received.

301-1: 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.

301-2: Recycled input materials used

Explanation for omission: Kingston does not track the total amounts, neither in weight or volume, of raw materials that are used to produce the organization's primary products and services.

301-3: Reclaimed products and their packaging materials

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

GRI 302: Energy (2016)

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

Kingston has always sought ways to be more energy efficient with the manufacturing and distribution of our products. We understand this affects the communities in which we live, as well as the cost of product production. 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.

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

For energy, in most areas Kingston operates, we seek and purchase from utilities that include renewable sources. 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 at this facility.

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 local EHS teams to discuss results, opportunities, strategies and decision-making regarding energy usage. Energy data is monitored and compiled by the internal EHS & Sustainability teams using energy usage data. 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. The management approach includes goals and targets, responsibilities, and available resources. Goals and targets for energy usage are determined, management has delegated responsible groups and resources are allocated as needed.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include internal audits of systems that track and monitor progress of goals and targets. These results are presented to upper management through management review. External sources are primarily focused on validation audits for the ISO 14001 Management System. Adjustments are made as new technologies become available. New or updated 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: 1.2320856e+13 J

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

- i. Electricity consumption 1.78254396e+14 J
- ii. Heating consumption 1.0742724e+13 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: 1.90575252e+14 J

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition), US EPA Center for Corporate Climate Leadership: Indirect Emissions from Purchased Electricity http://www.convertunits.com

302-2: Energy consumption outside of the organization

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

302-3: Energy intensity

- a. 0.000129749
- b. Units produced
- c. Type of energy: Fuel, Electricity, Heating
- d. Within the organization

302-4: Reduction of energy consumption

One of Kingston's locations is running on 100% renewable energy as of 2021 which accounts for 2.47392e+12 Joules of total electricity consumption.

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

Explanation for omission: Information on reductions in energy requirements of products and services are currently unavailable.

GRI 303: Water and Effluents (2018)

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

Kingston understands the importance water as a natural resource and its impact in business operations. Impacts occur at all locations in which Kingston operates:

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

Kingston does not use any water intensive processes nor consumes water for product output. The majority of our water usage is for personal use by employees (i.e., hygiene, restrooms, cooking where facilities allow for it). Less than 5% of our total water usage is used through production processes and we use recycled water when available at facilities where landscaping is present. At this time, Kingston's measurement and reporting includes all operations under its control.

103-2: The management approach and its components

Water and effluents are managed as part of certified management systems and regulatory requirements. The management approach is in place to minimize our impacts on natural resources including water. As with all of our Environmental Topics, Kingston will report through the EHSS Team to upper management regarding any polices, commitments, goals and targets for water topics.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include continual monitoring and verification of potential pollutants released into water sources. As part of management systems in place, internal and external audits are also a part of the evaluation process. Any findings are reported to upper management through management review as needed. External approaches are primarily focused on validation audits for the ISO 45001 and ISO 14001 certifications. Adjustments are made as new information and requirements 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). Less than 5% of our total water usage is used through production processes and we use recycled 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 cause as a result of business-related activities. Sampling of storm water discharges are collected during storm water events throughout the year and quality impacts are verified by third party laboratories. Quality is determined using the NPDES Industrial General Permit standards.

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 stakeholders on water mitigation programs.

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.

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 142.89

Total water withdrawal from all areas in mega liters

142.89

Total water withdrawal from third-party water from water stress areas 140.97

Total water withdrawal from all areas with water stress in megaliters

140.97

Total water withdrawal from surface water - Freshwater (≤1,000 mg/L Total Dissolved Solids) 142.89

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

0

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

125.10

Total water discharge to all areas in megaliters

125.10

Water discharge by freshwater (≤1,000 mg/L Total Dissolved Solids)

125.10

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

123.18

Total water discharge to all areas with water stress in megaliters

123.18

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.

303-5: Water consumption

Total water consumption from all areas

17.79

Total water consumption from all areas with water stress

17.79

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

Kingston operates in areas where air quality is of concern to employees and the community. Many areas are mandated by regulation to limit air 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.

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. For emissions, Kingston has and continues to seek methods to reduce emissions from production and internal transportation. At this time, Kingston's measurement and reporting includes all operations under its control.

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 includes goals and targets for emissions, and responsibilities and resources are outlined.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include continual monitoring of emissions. As part of management systems in place, internal and external audits are also a part of the evaluation process. Any findings are reported to upper management through management review as needed. External approaches are primarily focused on validation audits for the ISO 45001 and ISO 14001 certifications. Adjustments are made as new information and requirements 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.734.26 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. 0.00

- 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 CO2 equivalent.
- 31643.01
- b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent: N/A
- c. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all: CO2
- 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

- a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent. 3.042.63
- b. If available, the 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: N/A
- d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation: N/A

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

305-4: GHG emissions intensity

a. GHG Emissions intensity ratio (Scope 1)

0.0000180

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

734.26

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

408000000.00

GHG Emissions intensity ratio (Scope 2)

0.00007756

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

31643.01

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

408000000.00

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

CO₂

305-5: Reduction of GHG emissions

Explanation for omission: Kingston has experienced market growth over the past year, thus increased energy usage. We are currently in the process of researching initiatives to reduce our GHG emissions.

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. Source of emission factors used: reflow ovens

c. Standards, methodologies, assumptions, and/or calculation tools used: emissions stack testing

GRI 306: Waste (2020)

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

Through utilization of the ISO 14001 Management System, environmental aspects, including waste, are identified and controlled while challenging our organization to consider our worldwide impacts.

Impacts occur at all locations in which Kingston operates:

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

Kingston utilizes the ISO 14001 Environmental management system as a guideline towards compliance with environmental regulations at each Kingston location. At this time, Kingston's measurement and reporting includes all operations under its control.

103-2: The management approach and its components

Kingston utilizes an EHS management review to discuss results, opportunities, and for decision-making regarding our environmental aspects, including waste. The management approach is in place to minimize our impacts on natural resources including landfills. As with all of our Environmental Topics, Kingston will report through the EHSS Team to upper management regarding any polices, commitments, goals and targets for waste.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include continual monitoring of emissions. As part of management systems in place, internal and external audits are also a part of the evaluation process. Any findings are reported to upper management through management review as needed. External approaches are primarily focused on validation audits for the ISO 14001 certifications. Adjustments are made as new information and requirements become available, and processes and policies are developed from data received.

306-1: Waste generation and significant waste-related 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.

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

306-2: Management of significant waste-related impacts

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 process. 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.

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.

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

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

1148.77 metric tons

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: 1009.05 metric tons
- 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: 78.79 metric tons
- 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: 930.26 metric tons
- 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: 0
- ii. offsite: 1009.05 metric tons
- 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. We do not have any onsite recovery operations.

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.

139.72 metric tons

- b. Total weight of hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations:
- Incineration (with energy recovery); 0
- ii. Incineration (without energy recovery); 0
- iii. Landfilling; 0.29 metric tons
- 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); 0
- ii. Incineration (without energy recovery); 0
- iii. Landfilling: 139.44 metric tons
- 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; 0
- ii. offsite. 139.72 metric tons
- 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

Through ISO 14001, environmental aspects are collected and challenge our organization to look at our worldwide impacts.

Impacts occur at all locations in which Kingston operates:

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

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

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

103-2: The management approach and its components

Currently Kingston manages this topic through ISO 14001 and through RBA code of conduct and expectations. Through ISO, there are policies, goals and targets that have responsibilities and resources provided and are measurable and audited. Through the RBA, the EHSS team is expected to help create science-based targets for ourselves and to help monitor environmental stewardship from our suppliers.

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

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 QEHSI management systems that are communicated. Kingston accepts responsibility for environmental compliance and ensures alignment of business with the ISO 14001 Environmental management system. Kingston ensures through the EHSS team that the appropriate resources are gathered and available to ensure environmental compliance on behalf of Kingston. 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

Evaluation of the management approach is made through internal and external sources. Internal sources include continual monitoring of emissions. As part of management systems in place, internal and external audits are also a part of the evaluation process. Any findings are reported to upper management through management review as needed. External approaches are primarily focused on validation audits for the ISO 14001 certifications. Adjustments are made as new information and requirements become available, and processes and policies are developed 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

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. The impacts occur at locations where Kingston products are

manufactured and sold. Kingston utilizes internal and external groups to audit and review suppliers for adherence to the RBA Code of Conduct. Kingston has not included the collection of environmental specific metrics from our suppliers in the supplier environmental assessment process.

103-2: The management approach and its components

Kingston manages the topic of suppliers through supplier evaluations, along with our purchasing and procurement teams, by utilizing RBA VAP audits, internal vetting reports, and CSR supplier audits. Supplier management issues are managed through top management and rolled up to the VP of Administration to the Executives Committee as needed. 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

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. External sources are primarily focused on RBA VAP audits and CSR supplier audits. 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. Adjustments are made as observations and audit data becomes available. New processes and policies are developed from data received.

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

Percentage of new suppliers that were screened using environmental criteria: 100%

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

Number of suppliers assessed for environmental impacts: 4

400 SERIES: SOCIAL TOPICS

GRI 401: Employment (2016)

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

As a global organization, Kingston has always held our employees to the upmost importance. We understand our employees are one of our top resources, which is why one of Kingston's core values is Investing in our Employees. This core value is Kingston's commitment to the wellbeing of our employees. Impacts occur at all locations in which Kingston operates: United States of America, United Kingdom, Taiwan, Ireland, China

For employment, Kingston seeks, interviews, vets and hires employees best fit for the position. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic through a formal HR department that reports and provides advice to the Executive Committee as needed, internal and external management training, and the CSRMC for decision-making and strategies that may affect employment action. Employment resources, direction and data are managed through the HR Department and rolled up to the VP of Administration to the Executive Committee as needed. The CSRMC is involved from an adjunct standpoint to provide input on direction of employment management as needed. Management approach is through HR policies and procedures that have been vetted to comply with employment laws in which Kingston operates to ensure it meets the company's Core Values. Kingston has an active approach for employment opportunities including upward mobility within the company. Our executive and senior management make-up reflect this approach. Kingston maintains grievance mechanisms which are available to employees.

103-3: Evaluation of the management approach

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

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 | 67 | 24 (36%) | 34 (51%) | 9 (13%) | 43 (64%) | 24 (36%) |
| UK | 33 | 7 (21%) | 14 (42%) | 0 (0%) | 17 (52%) | 16 (48%) |
| Taiwan | 170 | 85 (50%) | 85 (50%) | 0 (0%) | 92 (54%) | 78 (46%) |
| Ireland | 1 | 1 (100%) | 0 (0%) | 0 (0%) | 1 (100%) | 0 (0%) |
| China | 389 | 220 (57%) | 169 (43%) | 0 (0%) | 88 (23%) | 301 (77%) |

a. 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 | 161 | 32 (20%) | 101 (63%) | 28 (17%) | 103 (64%) | 58 (36%) |
| UK | 94 | 26 (28%) | 48 (51%) | 6 (6%) | 45 (48%) | 49 (52%) |
| Taiwan | 56 | 25 (45%) | 29 (52%) | 2 (4%) | 33 (59%) | 23 (41%) |
| Ireland | 0 | 0 (0%) | 0 (0%) | 0 (0%) | 0 (0%) | 0 (0%) |
| China | 471 | 221 (47%) | 249 (53%) | 1 (0.21%) | 112 (24%) | 359 (76%) |

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. 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 |
|------|--------|
| 373 | 330 |

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

| Male | Female |
|------|--------|
| 17 | 64 |

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

| Male | Female |
|------|--------|
| 16 | 38 |

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 | 34 |

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

| Male | Female |
|------|--------|
| 94% | 59% |

GRI 402: Labor management relations (2016)

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

As a global organization, Kingston always holds our employees to the upmost importance. We understand our employees are one of our top resources and our greatest assets, which is why one of Kingston's core values is Respect, Integrity and Fairness, and Investing in our Employees. These core values are Kingston's commitment to the well-being of our employees. Impacts occur at all locations in which Kingston operates:

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

Employee relationships are very important to the success of Kingston. As such, management and labor relationships are continually monitored. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic through a formal HR Department that reports to the Executive Committee and provides advice and training to relevant parties as needed. 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. Management approach is through HR 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 HR Department. The VP of Administration and the Executive Committee are involved as needed.

103-3: Evaluation of the management approach

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

Adjustments to policies and processes are made as new information and laws become available.

402-1: Minimum notice periods regarding operational changes

Kingston provides advanced notices in accordance with regulatory requirements in the different locations 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

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.

Impacts occur at all locations in which Kingston operates:

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

For employment, Kingston seeks, interviews, vets and hires employees best fit for the position need. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic utilizing a validated and certified Occupational Health and Safety Management System, in conformance with ISO 45001. Management approach is to prevent occupational injuries and illnesses that would stem from risks and exposures within the workplace. The management approach is through specific ISO 45001 policies and procedures that have been implemented and comply with workplace safety laws in which Kingston operates. Kingston has an active approach for the identification of risks and exposures, and a corrective action process. Our senior management and executives receive regular reporting that support strategic decision-making with regards to these efforts.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include internal audits and the monitoring of initiatives. External sources are primarily focused on validation audits for ISO 45001. Results of internal and external audits are communicated to executives through management review. Adjustments are made as new information, laws, NGOs OHSMS standard criteria changes, and resources become available. Processes and policies are developed and modified from data received.

403-1: Occupational health and safety management system

Kingston Technology has an occupational health and safety management system that meets the criteria set forth in ISO 45001 and has attained certification. 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.

The ISO 45001 management system was not implemented because of legal requirements. The system was implemented based on globally recognized risk management and management system standards.

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 safety inspections of the workplace, scored risk assessments of all workplace activities and machinery, and a risk observation assessment to determine work-related hazards and assess risks. These processes are applied to routine and non-routine workplace activities. Application of the hierarchy of controls is part of the corrective action process from the findings of these assessments. 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 function. The internal and external audits are completed as continual improvement. 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 (IIPP) 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 Whistleblower policies.

Globally, many policies are trained to all employees through Kingston's Environmental, Health and Safety Program. These policies/procedures are trained to enable employees to identify and report hazards. Policies included but not limited to are: Risk Assessments, IIPP, Incident Reporting, Whistleblower Policy, etc. Part of the management system includes a section on occupational injury and illness investigation. 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:

- 1. Visiting the incident/accident scene as soon as possible.
- 2. Interviewing the injured worker(s), if possible.
- 3. Interviewing witnesses individually, not together.

- 4. Examining the entire work area for additional factors associated with the incident or accident.
- 5. Determine root cause(s).
- 6. Determine corrective action to prevent a recurrence and document.

403-3: Occupational health services

All employees and workers who are not employees but whose work and/or workplace is controlled by the organization are required to review, discuss, and sign-off on expected safe practices while at our organization. Any health and safety exposures at the workplace that require medical surveillance or treatment, Kingston ensures treatment and the confidentiality of personal health-related information.

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

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:

- EHS Management Review Meetings.
- · Safety Meetings.
- New employee orientation, including a discussion of health and safety policies and procedures.
- Workplace health and safety, training programs.
- 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.
- Employee involvement and consultation arrangements are documented and interested parties are informed.
- An Employee Suggestion Program (ESP) where individual employees can receive recognition for improving the health and safety, and environment of the workplace.
- Posted and/or distributed safety information.

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:

- For all new employees through New Employee Orientation.
- For all employees with respect to specific hazards to each employee's job assignment.

- For all employees given a new job assignment for which training has not been previously provided.
- Whenever new materials, substances, processes, procedures or equipment are introduced to the workplace and represent a new or unknown hazard.
- Whenever a new or previously unrecognized hazard is discovered resulting from: an observation, safety suggestion, safety inspection, or an issuance of a CAR.
- 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.
- For all contractors conducting work at Kingston's controlled workplaces.
- Visitors receive a debrief and are required to sign off on our health and safety expectations in the workplace.

403-6: Promotion of worker health

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

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:

Internal communications, 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 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: Work-related injuries

- 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): 0
- iii. The number of recordable work-related injuries: 14
- iv. The main types of work-related injury: Cuts, traffic
- v. The number of hours worked: 5217083
- 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: 1
 - iv. The main types of work-related injury: cut
 - v. The number of hours worked: N/A
- c. Kingston utilizes the risk assessment process found in the ISO 45001 management system 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

- a. For all employees:
 - i. The number of fatalities as a result of work-related ill health: 0
 - ii. The number of cases of recordable work-related ill health: 4
 - iii. The main types of work-related ill health: work related stress
- 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 ill health: 0
 - ii. The number of cases of recordable work-related ill health: 0
 - iii. The main types of work-related ill health: N/A
- c. The work-related hazards that pose a risk of ill health, including:
 - i. how these hazards have been determined:
 - ii. which of these hazards have caused or contributed to cases of ill health during the reporting period:
 - iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls: Kingston utilizes the risk assessment process found in the ISO 45001 management system to determine hazards. This risk assessment process includes numerical ranking of hazards that provide an indication of probability and severity

- d. No employees or workers who are not employees but whose work and/or workplace is controlled by Kingston have been excluded from this disclosure.
- e. All data reported has been compiled through reports and no assumptions were made.

GRI 404: Training and education (2016)

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

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

Impacts occur at all locations in which Kingston operates:

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

For training and education, Kingston provides opportunities and access to educational resources and educational reimbursement. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

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. As Kingston holds its 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. 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

Evaluation of the management approach is made through internal sources with external influence. Kingston provides resources for training of required skills to ensure competency of employees. The results of internal and external audits, along with monitoring data indicate the system is working. Also, internal personal performance metrics provide an indication of where the transfer of knowledge has been effective. Adjustments are made as new information, products, equipment, and experiences become available. The educational and training process is modified based upon business needs.

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

| Gender | Average Hours of Training |
|--------|---------------------------|
| Male | 19.44 |
| Female | 18.22 |

| Employee Category | Average Hours of Training |
|--------------------------|---------------------------|
| Management | 15.97 |
| Professional/Technical | 20.74 |
| Sales | 14.69 |
| Clerical/Administrative | 18.77 |
| Production/Warehouse | 17.18 |

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 | 83% |
| Female | 82% |

| Employee Category | Percentage of employees receiving regular performance and career development reviews |
|-------------------------|--|
| Management | 81% |
| Professional/Technical | 82% |
| Sales | 80% |
| Clerical/Administrative | 81% |
| Production/Warehouse | 81% |

GRI 405: Diversity and equal opportunity (2016)

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

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

Impacts occur at all locations in which Kingston operates:

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

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 best fit for the position and is an EOE/D/V employer. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic through a formal HR Department that reports to the Executive Committee. 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. Management approach is through HR 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

Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. External sources are primarily focused on third-party validated audits for the relevant topics. 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. Adjustments are made to the management approach as new information, laws and experiences become available. Processes and policies are developed from data received.

405-1: Diversity of governance bodies and employees

Governance Body

| Gender | Percentage |
|--------|------------|
| Male | 83% |
| Female | 17% |

Employees

| Category | Percentage |
|---------------------|------------|
| Male | 45% |
| Female | 55% |
| Age group: under 30 | 15% |
| Age group: 30-50 | 67% |
| Age group: over 50 | 15% |

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

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.

Impacts occur at all locations in which Kingston operates:

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

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 best fit for the position need and is an EOE/D/V employer. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic through a formal HR Department that reports to the Executive Committee and provides advice and training to relevant parties as needed. The purpose of the management approach is to provide a safe working environment free of discrimination. Management approach is through HR policies and procedures that 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 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 HR confidentially for any grievance without fear of reprisal, and this is reflected in policies and procedures.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. HR and the CSRMC are involved as items are reported out to Executives. External sources are primarily focused on third-party validated audits for the relevant topics. 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. Adjustments to policies and procedures are made to the management approach as new information and laws become available.

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

As a global organization, Kingston always holds our employees to the upmost importance. We understand and respect the human rights of all workers, which includes the right 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.

Impacts occur at all locations in which Kingston operates:

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

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. At this time, Kingston's reporting and measurement includes all employment

under its control.

103-2: The management approach and its components

Kingston manages this topic through a formal HR Department and the CSRMC that reports to the VP of Administration who communicates with the Executive Committee as needed. The purpose of the management approach is to ensure workers and/or their representatives are able to openly communicate and share ideas and concerns to management. 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 allowed to confidentially approach managers and HR for any grievance without fear of discrimination, reprisal, intimidation, or harassment. This is reflected in internal policies and procedures.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include controlled policies and procedures as well as a formal HR department which reports to the Executive Committee as needed. External sources are primarily focused on third-party validated audits for the relevant topics. 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. Adjustments are made to the management approach as new information and laws become available.

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

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

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

As a global organization, Kingston has always held employment and the types therein to the upmost importance. Kingston is committed to the well-being of our employees, while ensuring ethical employment practices.

Impacts occur at all locations in which Kingston operates:

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

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

103-2: The management approach and its components

Kingston manages this topic through a formal HR Department and the CSRMC, utilizing third-party validated audits to report on performance towards this topic. These reports provide insight to the CSRMC, HR, and the Executive Committee as needed, for decision-making and strategies that affect employment actions. Child labor issues are managed through HR which reports to the VP of Administration who communicates with the Executive Committee as needed. Management approach is through HR and CSR policies and procedures that have 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

Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. External sources are primarily focused on third-party validated audits for the relevant topics. HR and the CSRMC are involved as items are reported out to Executives. Child labor issues are managed through HR which reports to the VP of Administration who communicates with the Executive Committee as needed. HR, along with the CSRMC continues to drive direction in this area. Adjustments are made as new information, laws and experiences become available. New processes and policies may be 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 CSRMC and Executives as needed. 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

As a global organization, Kingston has always held employment and the types therein to the upmost importance. Kingston is committed to the well-being of our employees, while ensuring ethical employment practices.

Impacts occur at all locations in which Kingston operates:

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

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

103-2: The management approach and its components

Kingston manages this topic through a formal HR Department and the CSRMC, utilizing third-party validated audits to report on performance towards this topic. These reports provide insight to the CSRMC, HR, and Executive Committee as needed, for decision-making and strategies that affect employment actions. Forced or compulsory labor issues are managed through HR which reports to the VP of Administration who communicates with the Executive Committee as needed. 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

Evaluation of the management approach is made through internal and external sources. Internal sources include data collection, monitoring, and reporting of this management approach. External sources are primarily focused on third-party validated audits for the relevant topics. HR and the CSRMC are involved as items are reported out to Executives. Forced or compulsory labor issues are managed through HR which reports to the VP of Administration who communicates with the Executive Committee as needed. Adjustments are made as new information, laws and experiences become available. New processes and policies may be developed from data received.

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

As we utilize suppliers in various geographic areas, we continue to monitor the risk of forced or compulsory labor through our due diligence mechanisms.

Internal and external mechanisms including third-party validated audits. Results are communicated to the CSRMC and Executives as needed. 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

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.

Impacts occur at all locations in which Kingston operates:

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

For security, Kingston vets and hires security personnel and third-party vendors best fit for the security need. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic through our General Affairs Department that reports and provides insight to the Executive Committee as needed, EHS Department and HR Department for decision-making and strategies that affect employment action. Security resources, direction and data are managed through the General Affairs Department and rolled up to the VP of Administration to the Executive Committee as needed. EHS and the HR are involved from an adjunct standpoint to provide input and advice on direction of employment management. Management approach is through security procedures that comply with appropriate laws, while ensuring the security of our employees in which Kingston operates.

103-3: Evaluation of the management approach

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

100% of security personnel have received formal training our human rights policies or specific procedures and their application to security

Training requirements apply to third-party organizations providing security personnel.

GRI 412: Human Rights Assessment (2016)

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

As a global organization, Kingston has always held employment and the types therein to the upmost importance. Kingston is committed to upholding the protection of human rights of all workers. Impacts occur at all locations in which Kingston operates:

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

We are committed to ensuring that we are not involved in any human rights violations and hold our suppliers and partners to this same high standard. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages this topic through a formal HR department and the CSRMC, utilizing third-party validated audits to report on performance towards this topic. These reports provide insight to the CSRMC, HR, and the Executive Committee as needed for decision-making and strategies that affect human rights. Human rights issues are managed through HR and the CSRMC which reports to the VP of Administration who communicates with the Executive Committee as needed. 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

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 sources are primarily focused on third-party validated audits for the relevant topics. Human rights issues are managed through HR and the CSRMC which reports to the VP of Administration who communicates with the Executive Committee as needed. Adjustments are made as new information, laws and experiences become available. New processes and policies may be developed from data received.

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

Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by location:

| Location | 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

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: 1385

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

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 diverse communities and serves a widely diverse customer base. As such, Kingston strives to support and positively impact our local communities. Impacts occur at all locations in which Kingston operates: United States of America, United Kingdom, Taiwan, Ireland, China

Kingston contributes to its local communicates as needs are determined in each region. 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 dedicated teams at each region as different regions have different needs. All responsible teams work with the appropriate leadership planning and decision-making that affects the local community. Decisions may include multiple engagement opportunities that are aligned with the company's core values and commitments. The management approach includes the commitment to positively impact our local communities, responsible teams, and providing available resources that align with our commitment.

103-3: Evaluation of the management approach

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. Responsible teams meet with leadership to provide and discuss any updates regarding the local community as needed.

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

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

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. Kingston has donated over \$600,000 USD through monetary and in-kind donations. Kingston's employees have volunteered over 600 hours. Through our donations and volunteering efforts, we have supported over 100 community organizations and impacted over 50,000 individuals globally.

Kingston reports on our ongoing monitoring of environmental impacts utilizing the Carbon Disclosure Project (CDP) framework. Results of ongoing monitoring are included in environmental assessments 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 reports on our ongoing monitoring of environmental and social impacts utilizing the CDP and Global Reporting Initiative (GRI) frameworks. Results of ongoing monitoring are included in assessments to make goals and commitments to mitigate Kingston's potential negative impacts on its local communities.

GRI 414: Supplier Social Assessment (2016)

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

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

Impacts occur at all locations in which Kingston operates:

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

Regarding our suppliers, Kingston, working through internal departments, vets and reviews, and audits suppliers for adherence to ethical, environmental, and health and safety standards. Currently, Kingston's reporting and measurement of suppliers are validated through internal and third-party validated audits.

103-2: The management approach and its components

Kingston manages the topic of suppliers through the CSRMC by utilizing internal and third-party validated audits. These audits provide advice to the CSRMC, HR, and the Executive Committee as needed, for decision-making and strategies that affect purchasing, procurement, and supplier's actions. Supplier management issues are managed through the CSRMC and rolled up to the VP of Administration to the Executive Committee as needed. Management approach includes responsible groups along with their policies and procedures.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of suppliers while external sources are primarily focused on third-party validated audits. Findings are reported out to the Executive Committee as needed for decision making. The results of internal and external audits and data collection indicate the system is effective. Adjustments to the management approach are made as audit data is made available and updated regulations are introduced. Kingston continues to further develop its approach to assess social impacts of its suppliers globally.

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

Percentage of new suppliers that were screened using social criteria: 100%

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

Number of suppliers assessed for social impacts: 4

GRI 415: Public Policy (2016)

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

As a global organization, Kingston understands political contributions may present potential risks of corruption. As such, Kingston does not contribute to nor affiliate itself with any political stances. Impacts occur at all locations in which Kingston operates:

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

While Kingston does not make any contributions to public policy, Kingston respects the rights of all workers to engage in public policy, as well as the right to refrain from such activities. At this time, Kingston's reporting and measurement includes all employment under its control.

103-2: The management approach and its components

Kingston manages the topic through HR, CSR 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

The purpose of the management approach is to ensure that Kingston personnel conduct company business in compliance with the Policy and with the written laws of all countries in which the company does business. The responsible teams implement and maintain the management approach which includes policies and procedures that are in place. All Kingston employees 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, they may 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 appropriate teams as needed.

103-3: Evaluation of the management approach

Kingston utilizes internal and external audits as well as communication channel counts to evaluate the management approach. Results are based upon evaluation of the findings of the audits and communication channel counts. Adjustments are made through relevant management groups as results and information become 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

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. Impacts occur where all products are sold and marketed to as reported in Disclosure 102-6. 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 tested to relevant standards to ensure compliance and safety in the specific country it is sold in.

103-2: The management approach and its components

Kingston manages the topic of consumer health and safety through the product compliance team, along with our design engineering group, Technical Resources Group, and various compliance teams around the world, by performing safety testing, complying to applicable regulations, and performing design changes as needed. These activities provide advice to the product compliance team, our legal team as needed, and the Executive Committee as needed, for decision-making and strategies that affect purchasing, procurement, and future projects. Consumer health and safety issues are managed through the product compliance team and rolled up to the VP of Administration to the Executive Committee as needed. The product compliance team is to provide input and advice on direction of consumer health and safety management. Management approach is through safety laws and regulations applicable to all countries in which Kingston's products are sold. Kingston has an active approach for the assessment of the safety of its products.

103-3: Evaluation of the management approach

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 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

With several diverse products, the management of Kingston's marketing and labeling of our products in relation to product compliance 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. Impacts occur where all products are sold and marketed to as reported in Disclosure 102-6. Kingston's product compliance team, along with the relevant design packaging teams, help to create,

review and implement product labels.

103-2: The management approach and its components

Kingston manages the topic of product compliance related 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 the Executives Committee as needed, for decision-making and strategies that affect current and future projects. Product Compliance related marketing and labeling issues are managed through the product compliance team and rolled up to the marketing managers to the VP of Administration and to the Executives Committee as needed. The product compliance team is to provide input and advice on direction of marketing and labeling issues. Management approach is through manufacturing engineering and product compliance policies and procedures that have been vetted to 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

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

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. Impacts occur at all locations in which Kingston operates:

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

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

103-2: The management approach and its components

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

To learn more about Kingston's Privacy Policy, see here.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources including internal audits of systems that are to track and monitor progress of initiatives, and report results to the MIS department. External approaches are primarily focused on validation audits for the ISO/IEC 27001. The results of external and internal audits and data collection indicate the system is working toward stated goals. 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

As a global organization, Kingston understands the importance of socioeconomic compliance and hold ourselves accountable to ensure socioeconomic compliance with relevant guidelines, laws, and regulations within the areas in which we operate.

Impacts occur at all locations in which Kingston operates:

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

At this time, Kingston's reporting and measurement for this topic includes all facilities and relevant socioeconomic compliance requirements under its control.

103-2: The management approach and its components

Kingston manages this topic through its HR Department, CSRMC, and relevant groups. These responsible groups report to the VP of Administration who communicates directly with the Executive Committee as needed regarding socioeconomic compliance topics. Management approach is through policies and procedures that comply with appropriate socioeconomic employment laws and expectations.

103-3: Evaluation of the management approach

Evaluation of the management approach is made through internal and external sources. Internal sources include internal policies and procedures. External sources are primarily focused on third-party validated audits. The results of the evaluation of the management approach are reported to the VP of Administration and the Executive Committee as needed. Adjustments are made as new information and laws become available. 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.