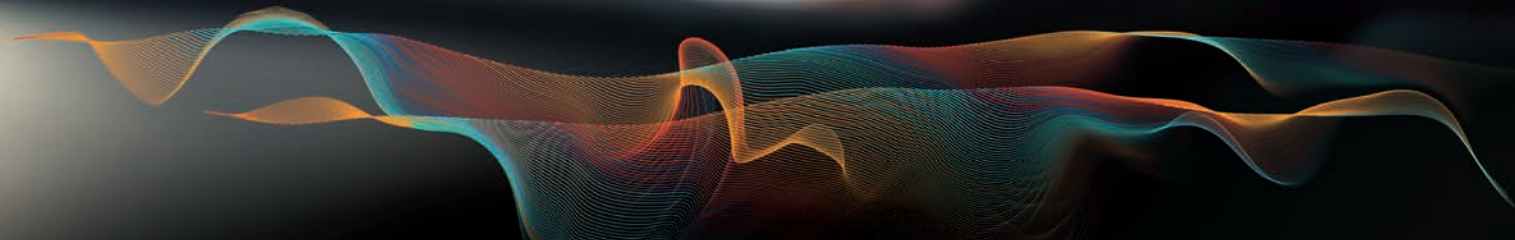
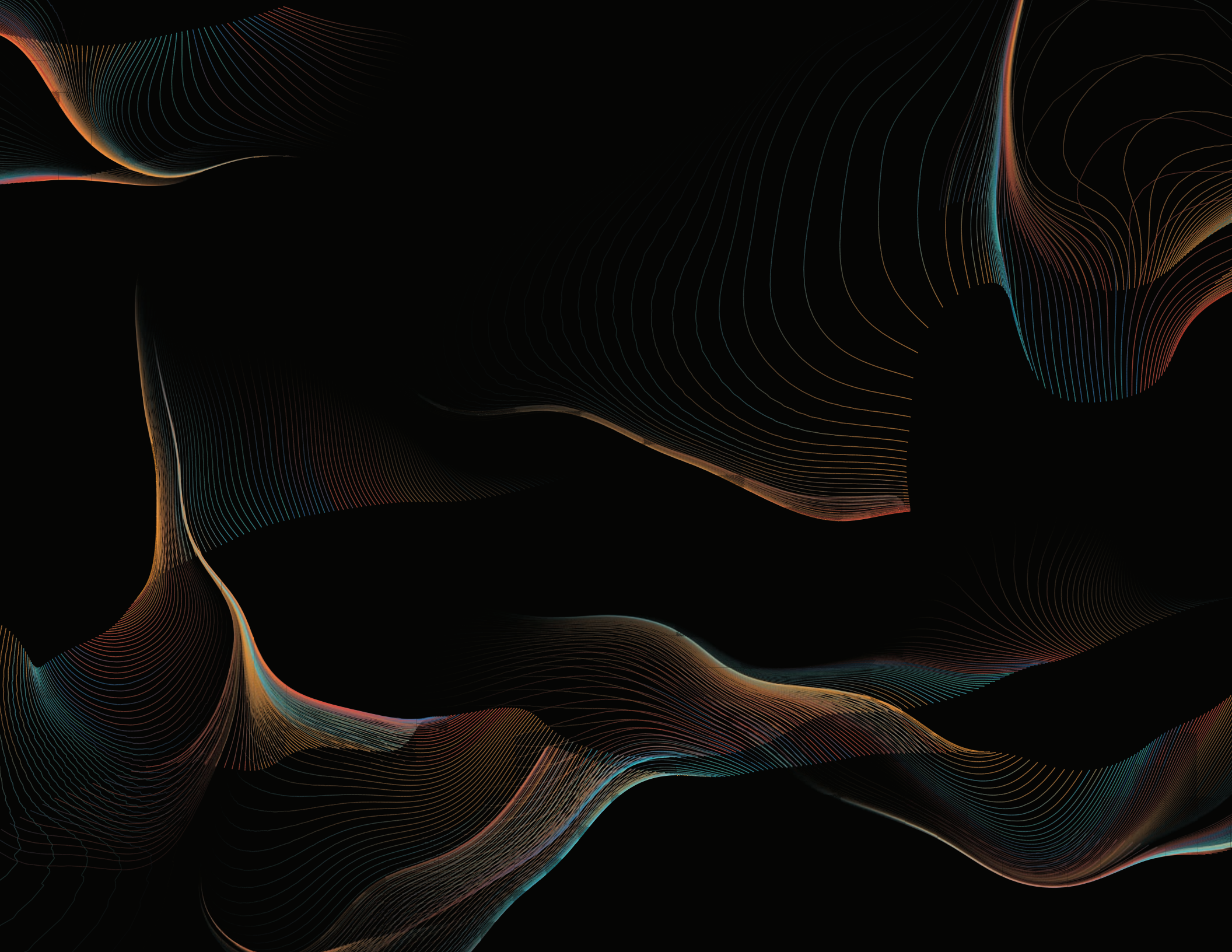


# Architecting a Better Future

2018 Sustainability Report

**Western Digital.**







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# Architecting a Better Future

We believe embracing transparency with our customers, partners and peers is critical to maintaining a sustainable business, and is a reflection of our sincere commitment to architecting a better future.

<sup>2</sup>



# CEO Letter



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At Western Digital, we believe that being an industry leader is not just about having talented employees or innovative products. It's also about doing business the right way, every day. That is why our commitment to sound corporate responsibility is deeply rooted in all aspects of our business.

At our operations throughout the world, we take responsibility for the impact we have on our people, our communities and our environment. Leading by example, we actively work with governments, non-governmental organizations and like-minded companies to raise the standards for doing business in a fair and sustainable way. That means we find new, more resource-efficient ways to build our products. We ensure our employees experience healthy working conditions and reasonable expectations of performance. We improve the energy efficiency of our products. We follow inclusive and fair recruiting practices. We invest significant time and resources in building and strengthening our communities. And that is just the beginning.

For example, in 2018, our strategic investments in and enhancements to our global manufacturing and packaging processes, as well as our advancements in product technology, significantly reduced our energy usage, greenhouse gas emissions and carbon footprint. Western Digital also became the first in the electronics industry

to implement a waste-to-energy program. The innovative initiative at our Philippines facility earned us recognition by the Department of Environmental and Natural Resources-Environmental Management Bureau (DENR-EMD) Calabarzon Region and helps us divert 35% of the site's waste from landfills.

Our employees are foundational to our corporate sustainability practices. We strive to create a culture of fairness, ethics and integrity, which enables our employees to do their best, most rewarding work and leads to high-quality and innovative products, exceptional customer service and operational excellence. Our Global Code of Conduct provides a unifying guide to help every employee understand and uphold their ethical and legal obligations to our company, partners, industry and community. Our strong corporate governance ensures accountability and the highest level of integrity in management practices across the organization.

The volume and value of data in our world today is unprecedented. As a global leader in data infrastructure, we aren't just envisioning the future, we have the opportunity to help create it. I am very proud of our sustainability efforts at Western Digital, and this report reflects the progress we have made on our sustainability journey. We believe embracing transparency with our customers, partners and peers is critical to maintaining a sustainable business, and is a reflection of our sincere commitment to architecting a better future.



Steve Milligan  
CEO, Western Digital

# Who We Are



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## Creating Environments for Data to Thrive

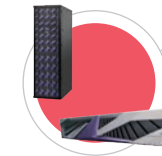
Western Digital, a leader in data infrastructure, drives the innovation needed to help the world capture, preserve, access and transform an ever-increasing diversity of data. Our company has long been at the forefront of game-changing innovations, including production of the world's first helium-sealed hard drives and 96-layer 3D NAND. From the invention of the first hard drive to recent advancements in non-volatile memory, our journey of innovation continues to inspire those who dare to think big about the possibilities of data.

4

Our drive to innovate extends beyond our development of data storage solutions, as we embrace the challenge to find new ways to protect our environment, enhance our communities and invest in our employees. Corporate sustainability is our charge to grow the business responsibly. We aim to make that idea fundamental in all that we do. We believe that no single company, non-governmental organization (NGO) or nation can solve the sustainability challenges we collectively face. Building a better world demands that we work together and combine expertise, networks, influence and passion toward meaningful solutions.

With the industry's broadest portfolio of storage devices, platforms and systems, our company is uniquely positioned to deliver the possibilities of data today and well into the future.

## SILICON-TO-SYSTEM INNOVATION AND ENGINEERING



**Integrated Storage Platforms**



**Platforms Innovation**  
(electrical and mechanical design, firmware and diagnostics)



**Device Innovation**  
(mechanical, packaging, testing, software, firmware and controllers)



**Advanced Media, Controller, Head, Firmware/FTL**

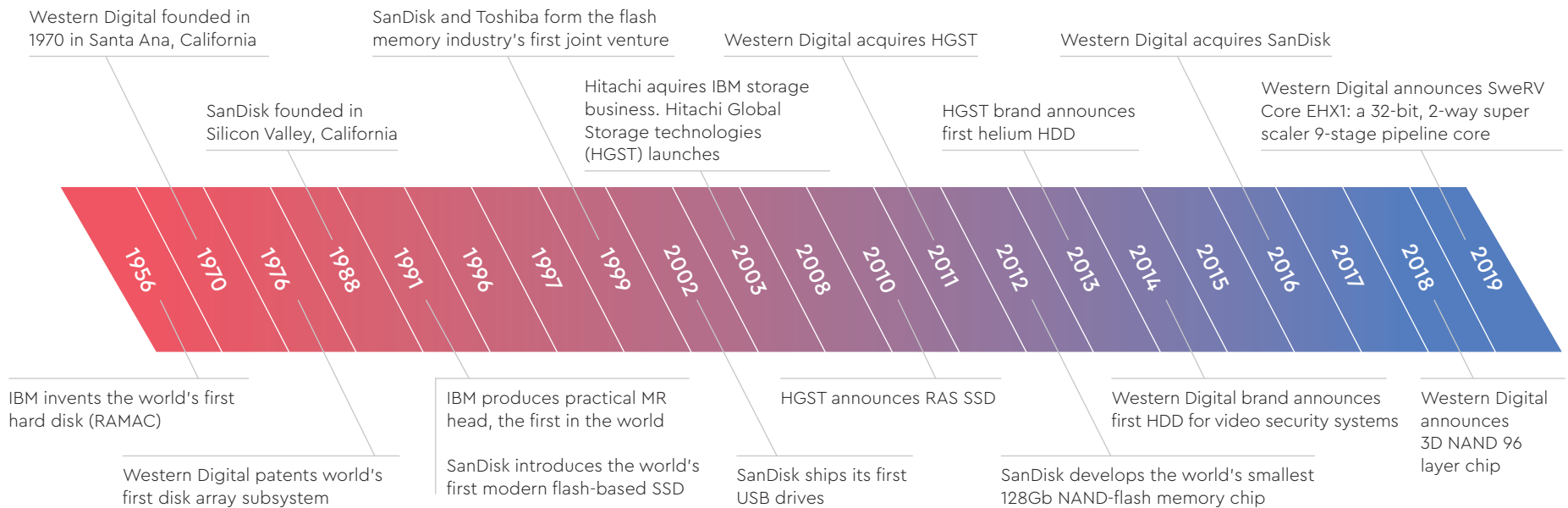


Western Digital has transformed in recent years, integrating independently successful companies including Western Digital, HGST and SanDisk. This broadened our technical expertise and extended our market reach. Throughout this journey, Western Digital also brought together world-class manufacturing operations, advanced research and operations capabilities, and complex supply chains. Today, Western Digital operates in more than 30 countries, with over a dozen manufacturing or product assembly facilities.

As a leader in technology and manufacturing, we believe we can and should use our expertise and global footprint to have a positive impact on the world. That belief is embodied in our company vision: to architect how data enables the world to solve its biggest challenges. Not only is Western Digital committed to being a responsible corporate citizen, we are also helping others unlock the power of data to tackle the world's largest sustainability challenges on a global scale.

## Our company vision: to architect how data enables the world to solve its biggest challenges.

### OUR HISTORY OF INNOVATION



## Making a Difference on a Global Scale

At Western Digital, our technological expertise gives us a unique opportunity to contribute to sustainability efforts well beyond the impact of our operations. To take advantage of that opportunity to give back, we started the Data Makes Possible strategic initiative, a platform and program that highlights how people, companies and technologies can enable true change in the world through data. According to a recent [International Data Corporation \(IDC\) Report](#), only 5% of available data in the world today is actually analyzed. Western Digital is committed to supporting efforts and collaborations that broaden the use of data and allow the world to tap into everything that data makes possible.

6 Western Digital, United Nations Global Pulse and Skoll Global Threats Fund launched the [Data for Climate Action \(D4CA\) Challenge](#) in 2017. This unprecedented data innovation competition connected data scientists, researchers and innovators with privacy-protected datasets from around the world to generate insights to fight climate change. Through acts of [data philanthropy](#), a diverse coalition of global companies donated anonymized datasets from six categories of data (environmental, energy, consumer purchasing, telecommunications, transportation and social media) to be galvanized into action for the challenge.

The D4CA challenge received hundreds of applications from 67 countries worldwide. We chose 97 teams as semi-finalists and worked on innovation projects around three thematic areas:

- Climate Mitigation
- Climate Adaptation
- Climate and the Sustainable Development Goals (SDGs)

We announced winners during an event at the United Nations' annual Climate Change Conference, COP23, in Bonn, Germany. Winning solutions ranged from pollution mitigation in Mexico City, preventing and alleviating road flooding to winter seeding recommendations in enhancing agricultural yield.

In 2018, we released a video and infographic series to answer the question, "[What could happen in a world that's 4 degrees warmer?](#)" Made in collaboration with WIRED Brand Lab and featuring comedian Aparna Nancherla, Professor of Atmospheric Science Inez Fung, UC Berkeley, and Chief Data Officer Janet George, Western Digital, the video and series explores the data and insights gleaned through data science on climate change. The video garnered significant attention with over 1,100,000 views, recognition as an official Webby honoree, a bronze Telly award for simplifying how data science can reshape what we know about and how we address climate change.

Building on this momentum, the program hosted a number of events in 2018 in the United States and abroad, including an event on the [Value of Data](#) in collaboration with Bloomberg in New York City.

Additionally, the award-winning [DataMakesPossible.com](#) brought together technology and government leaders and leading academia to showcase what data enables, spanning topics such as AI, data science, autonomous vehicles, climate action, "data for good," data privacy, precision medicine and more. Contributions to the platform, which was visited by over 1.2 million users, have included stories from many thought leaders and forward-thinking companies.



# About This Report



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With Western Digital's 2018 Corporate Sustainability Report, we reinforce our commitment to sustainability and corporate responsibility as an industry leader and global corporate citizen. While this report was created in large part to showcase and provide transparency to our stakeholders on our sustainability journey and progress, we also sought to execute a broad and deep assessment to better understand the company's greatest environmental, social, and governance (ESG) impacts, risks and opportunities to further enhance our practices in the future.

## Approach

We intend for this report to reflect our deeply held belief in doing business the right way, every day—which means fairly, ethically and sustainably. To create the report, we worked with a team of global leaders across our business as well as independent, third-party experts to conduct a materiality assessment to help us identify, assess and prioritize ESG topics most significant to our company and stakeholders. As a result, the report focuses on our progress in a wide variety of strategic areas:

- Adherence to fair business practices through strong guidelines
- Oversight and employee education
- Sustainable product lifecycle practices

- Responsible practices relating to chemical and hazardous substances and critical minerals and metals
- Energy efficiency and renewable energy use
- Protecting the rights, health and opportunities of our employees around the world and across genders, races, ethnicities and age

For more information on our 2018 materiality assessment process and results, please see the [Appendix](#).

Western Digital understands that as the volume, velocity and variety of data continues to grow exponentially, so does the need to protect it. As a result, this report highlights our work to safeguard the privacy and security of the data of our company, customers and partners. Additionally, this report emphasizes our belief that corporate sustainability should go beyond environmental and labor considerations to provide a positive social impact on the local communities in which we operate. This has led us to an impactful giving and volunteerism program around the world, a deep commitment to inspiring and providing opportunities for future talent through STEM education and scholarship programs, and utilizing our technology and expertise to create positive change on a macro scale.

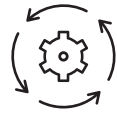
We are proud to share Western Digital's 2018 Corporate Sustainability Report covering the calendar year 2018, which has been prepared in accordance with the GRI Standards: Core option.

# Architecting Sustainable Products

Western Digital takes responsibility for how our products impact the environment and communities. We believe transparency enhances accountability, helping us improve the long-term sustainability of our products and business.



# Lifecycle Impacts



103-1

## WHY IT MATTERS

Our customers are adopting circular economy principles from product design through end-of-life management. As a true partner to our customers, we aim to minimize our product environmental impacts throughout their lifecycle and advance our technologies to adapt to evolving market demands.

103-2

## Responsibility

Western Digital's engineering teams—including Research and Development (R&D), Manufacturing and Quality Management—are all responsible for managing specific product lifecycle impacts. Each team plays an important role in ensuring appropriate product design, energy use and end-of-life management. Our R&D team helps ensure product efficiency by design, while the Product Environmental Compliance team under our Quality Management organization manages Western Digital's overall lifecycle assessment process.

**We aim to minimize our product environmental impacts throughout their lifecycle and advance our technologies to adapt to evolving market demands.**

## Materials and Product End-of-Life

We strive to be the industry leader in HDD and flash-based data storage products. We continuously innovate to reduce the raw materials used in each of our products on a per-gigabyte basis. Our myriad product channels and vertical integration allow us to exactly match our memory to product, cost and performance needs from stringent OEM requirements to consumer products, while maximizing manufacturing efficiency. Our operating mantra is that no functional memory is wasted.

Western Digital conducted an internal trial lifecycle assessment (LCA) in 2018 for HDD products using the requirements of ISO 14040. We performed the LCA in accordance with the WRI/WBCSD Greenhouse Gas (GHG) Protocol Initiative's Product Life Cycle Standard. We plan to undertake the full assessment during 2019–2020 to understand which phases of each product lifecycle emit the most emissions and implement emissions minimization initiatives accordingly.

Western Digital asks customers and consumers to recycle our products at the end of their useful life, in accordance with local waste requirements. We support the [European Union \(EU\) Waste Electrical and Electronic Equipment \(WEEE\) directive](#), where applicable. We label all Western Digital products with the appropriate end-of-life symbols for their respective regions. For more information, see [Western Digital's WEEE Statement](#) on our corporate website.

We established global minimum requirements for handling and disposal of electronic wastes (e-waste) from our own facilities and offices to eliminate or minimize adverse environmental impact. These requirements guide both the environmentally responsible disposal of e-waste and compliance with all applicable national, state and local regulations pertaining to the proper handling and disposal of e-waste.

Many Western Digital HDDs and SSDs now include an erase feature called Instant Secure Erase (ISE). Drives with ISE allow users to instantly erase a drive through industry-standard commands and options that render stored data meaningless and unusable. This feature has advantages over the traditional method of overwriting a drive with new data, which can take hours, especially for higher capacity drives. ISE can effectively erase both user-accessible data and potentially hidden user data that the drive maintains which the user cannot easily access, such as reallocated blocks or spare blocks. This feature reduces power consumption, enhances protection of sensitive data and improves the reusability of our products.

## Energy Efficiency

The rapid pace of technological change places new demands on our product energy consumption. Market forces drive our customers to commit to product energy reductions, which we work to deliver. Western Digital invests in the engineering required to continuously reduce our HDD and flash-based product energy needs.

As one example, Western Digital's transition to helium HDDs resulted in a dramatic reduction in both overall data center energy consumption and device-level energy consumption.

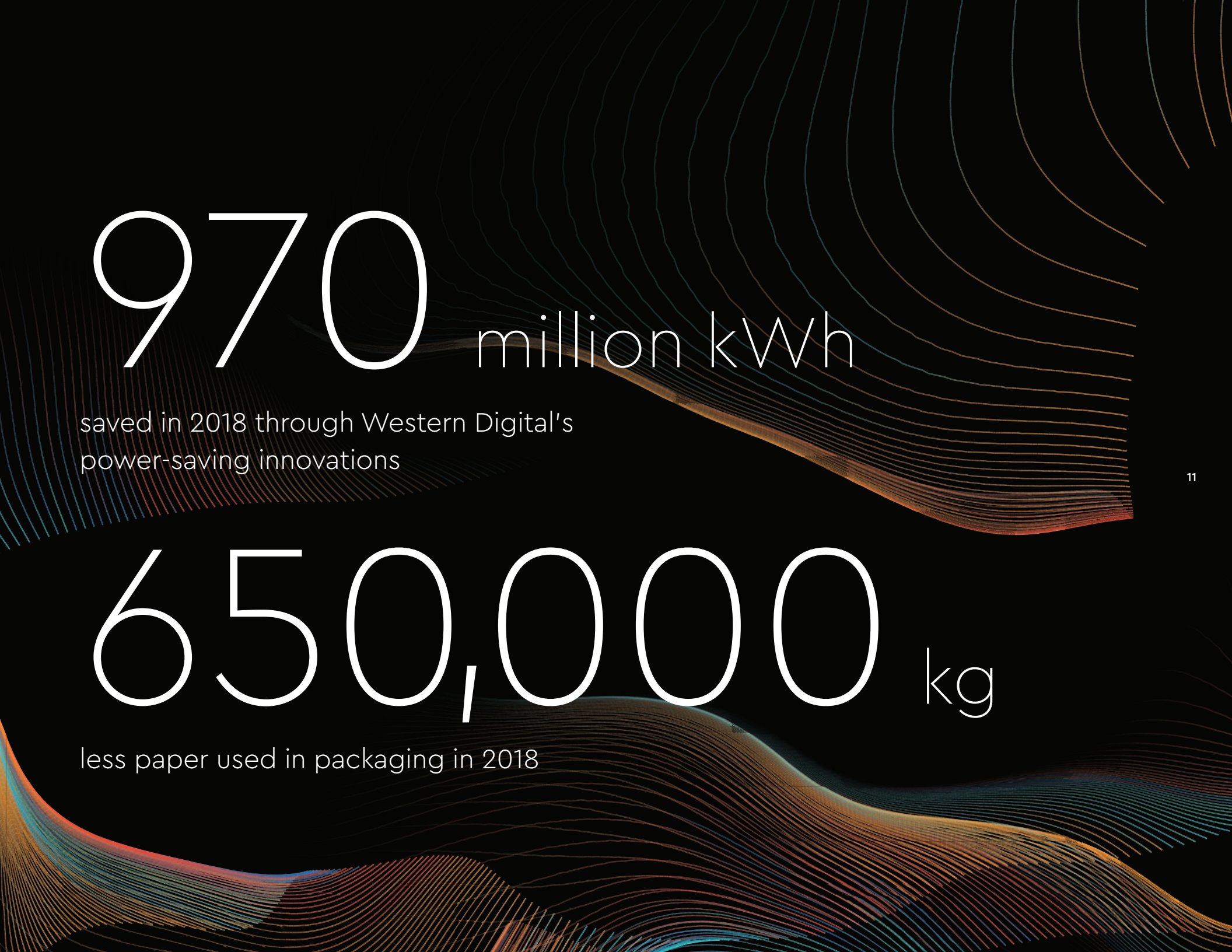
The transition began five years ago and now is widespread throughout data center products. In 2018 alone, this and other power-reduction innovations in Western Digital HDDs saved over 970 million kilowatt hours (kWh). Cumulatively since 2013, those power savings exceed 1.8 billion kWh.

We extensively test our HDDs as part of the manufacturing process to confirm their integrity and performance, and the testing is both time-consuming and power-intensive. To reduce the energy required to manufacture HDDs and minimize capital expenditures for test equipment, we continuously work to improve our testing efficiency and reduce overall test time. Though market demands require larger drive sizes which, in turn, increase test times, our engineering teams work to keep energy consumption trending downward. In 2018, Western Digital realized over 122 million kWh savings in power required to test our HDDs.

## Packaging

Western Digital strives to minimize waste through the use of increasingly efficient packaging designs and processes. This year, we achieved significant reductions:

- Redesigned retail packaging to reduce our annual blister paper usage by over 450,000 kg
- Adopted thinner blister paper in our packaging to save over 200,000 kg of paper per year
- Replaced a portion of the polyethylene terephthalate (PET) used in our packaging with recycled PET, reducing new PET consumption by over 20,000 kg per year
- Reengineered trays used in our manufacturing process to reduce our annual use of PET by more than 250,000 kg



970 million kWh

saved in 2018 through Western Digital's  
power-saving innovations

650,000 kg

less paper used in packaging in 2018

# Chemicals & Hazardous Substances



103-1

## WHY IT MATTERS

The manufacturing process for storage drives necessarily involves the use of chemicals. Our workers may come into contact with chemicals during the manufacture of our products, so we strive for risk-free worksites and products, innovating to minimize the use of hazardous chemicals and to develop safer substances for our products.

103-2

## Responsibility

Two teams are responsible for managing chemicals and hazardous substances in our operations and products:

- Real Estate Operations (REO) Global Environmental Health and Safety team: sets minimum corporate environmental, health and safety management requirements for operational use of chemicals in Western Digital's research, development and manufacturing operations worldwide
- Product Environmental Compliance (PEC) team: part of Quality Management Systems, ensures all Western Digital products meet worldwide environmental regulations and customer requirements, including the European Union (EU) Directive on the Restriction of the use of certain Hazardous Substances ([RoHS](#)) and EU's Registration, Evaluation, Authorization, and Restriction of Chemicals ([REACH](#))

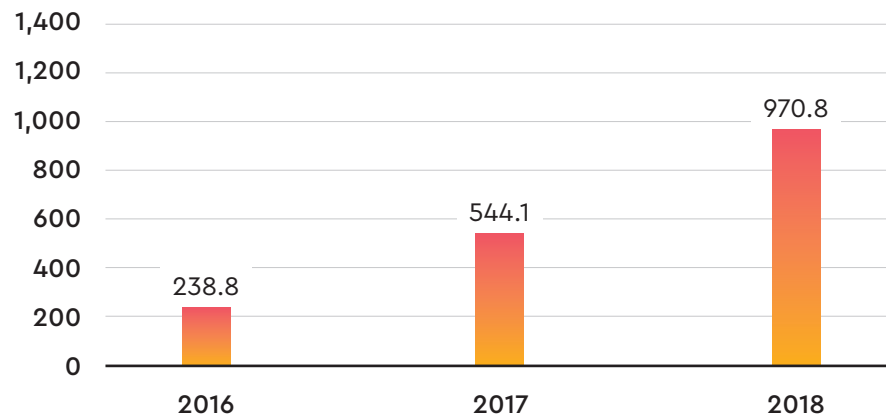
103-3

## Key Metrics

In addition to the paper and plastic savings mentioned above, Western Digital tracks the following metrics related to lifecycle impacts.

302-5

## ANNUAL ELECTRICAL POWER SAVINGS DUE TO HDD POWER EFFICIENCY INNOVATIONS (KWH IN MILLIONS)





## Policies

Western Digital's [Integrated Management System \(IMS\) Policy](#) describes our commitment to environmental compliance for all of our products and operations. The IMS covers numerous areas, including chemicals and hazardous substances management. For more information on Western Digital's Integrated Management System, please see the next section, [Architecting a Better Environment](#).

Additionally, our Product Environmental Compliance Engineering Specification and Requirements for Materials, Parts, and Product Protective Packaging identifies the product requirements of the PEC team. We send the specification to all relevant suppliers, and update the specification regularly.

## Responsible Manufacturing Practices

Our Global Environmental Health and Safety Requirements Manual prescribes the requirements for chemical management within Western Digital's operations. It covers authorization and use of chemicals prior to purchasing, maintenance of chemical Safety Data Sheets (SDSs), planning and response, and spill prevention and mitigation. We enforce specific site-level procedures and regulations for safe chemicals management and storage during all stages of chemical use.

All of Western Digital's global operations adhere to United Nations Globally Harmonized System of Classification and Labeling of Chemicals ([GHS](#)) to protect our manufacturing employees from chemicals and hazardous substances. We provide routine training to employees using this framework.

We believe in a proactive approach to managing product chemicals and hazardous substances in our operations and our products. Several internal initiatives have helped us automate our operations, improve our processes and help us stay ahead of regulations:

- Implemented a third-party system to monitor external regulation changes, allowing us to update new engineering specifications
- Improved customer inquiry management through our new Customer Requirement Management System (CRMS)
- Employed a Full Material Declaration (FMD) system to easily identify any banned or restricted substance in our products and quickly act on necessary changes; we request all suppliers to disclose FMD for each homogeneous material, and keep an inventory of all chemicals and materials used in our components in an automated system





## Key Metrics


Western Digital establishes targets related to product chemicals and hazardous substances management:

- **Zero product environmental compliance issues:**

We are proud to report Western Digital has not identified any non-compliance with product environmental laws and/or regulations at our company in the last ten years. In 2018, Western Digital had minimal violations for operational issues. Our sites reported a total of 25 notices of violation of environmental regulations related to their operations, in which only two carried financial penalties totaling \$5,240 and zero went through dispute resolution. All were resolved and closed.

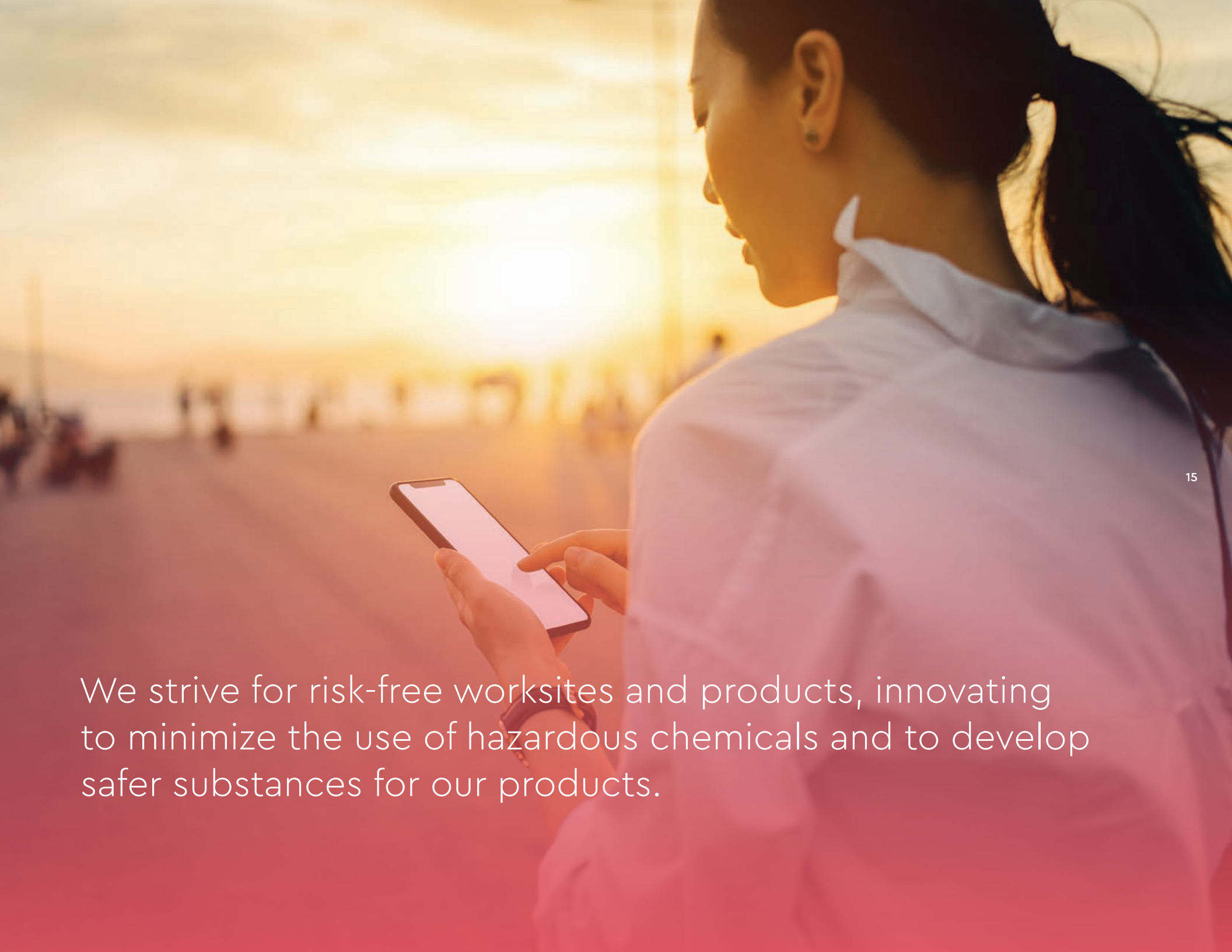
- 14 ◦ **No delay of customer's product environmental inquiry responses:** In 2018, we met our target to respond to customer inquiries within the allotted number of days from customers.

Our PEC team monitors our KPIs and reports them to the Vice President, Center of Excellence in Corporate Quality quarterly.



\$0

in fines for product environmental non-compliance



We strive for risk-free worksites and products, innovating to minimize the use of hazardous chemicals and to develop safer substances for our products.

# Architecting a Better Environment

Our environment affects all of us, individually and collectively. As we look to the future, Western Digital recognizes environmental stewardship is critical to the long-term success of our company, our customers and other stakeholders. We are fully committed to responsible use of the Earth's natural resources and we strive to minimize any impact on climate change as we work together to architect a better future.

## Integrated Management System

Western Digital was among the first companies to adopt an Integrated Management System (IMS) approach as an industry best practice for managing corporate quality, environmental, and health and safety standards. Our IMS has evolved over time into an exceptionally robust and effective system, enabling us to better track and demonstrate our commitment to protecting the environment, our people and our business sustainability.

Our IMS Policy includes our commitment to protect the environment, and our IMS approach allows us to achieve critical environmental certifications efficiently. The IMS policy is underpinned by industry-recognized environmental certifications for all sites, including ISO 14001. Visit our [Sustainability Certifications webpage](#) for more information on certifications earned through the IMS.

**Western Digital was among the first companies to adopt an Integrated Management System (IMS) approach as an industry best practice for managing corporate quality, environmental, and health and safety standards.**

## Energy & Emissions



103-1

### WHY IT MATTERS

Western Digital is particularly focused on the effects of global climate change. As the technology industry grows, our collective energy consumption and GHG emissions scale up as well. Climate change and financial reform legislation may continue to generate federal, international or other regulatory responses in the near future. But we are not waiting for those changes—Western Digital is working hard now to reduce our operational energy consumption and GHG emissions to minimize any effect on global climate change.

103-2

### Responsibility

Our global Real Estate Operations (REO) organization is responsible for the Energy and Resource Management (ERM) and Environmental Programs. The Environmental, Health, Safety & Security (EHS&S) and ERM Program Management Office (PMO) teams within REO design and implement the specific environmental programs and initiatives.

Western Digital's Global ERM PMO analyzes macro-level energy and emissions targets on an annual basis, setting Western Digital's corporate-level reduction target and strategy. Each Western Digital operational site uses this target to set energy and emissions reduction targets at a local level. Sites report reduction status on a semi-annual basis to the Global ERM PMO, and share an internal status report to the corporate management team annually.

Additionally, Western Digital's Global ERM Committee analyzes near-term energy reduction projects and targets, meeting quarterly to report progress and share best practices. Representatives from each site are responsible for identifying and monitoring energy reduction projects.

## 18 **Energy and Resource Management Program**

Western Digital manages energy conservation globally through our ERM Program. We reduce the amount of energy and carbon in our operations through various initiatives, including implementing energy efficiency and conservation opportunities, auditing our EMS, setting tactical targets, and measuring our progress. Since the program started, we have saved \$30 million while also collecting a rich amount of information and data.

Western Digital's REO organization conducts regular assessments with local energy management experts to review current operational processes and identify opportunities for higher energy efficiency. We promote energy efficiency by increasing reliance on high efficiency machines and through cost-neutral procedural or behavioral changes.

In 2018, we implemented several new energy efficient manufacturing processes or significant changes to existing processes, while simultaneously increasing our throughput and enhancing our quality. Equipment replacement was one of our biggest energy conservation opportunities in 2018. Many facilities are replacing old chillers, compressed air systems and other machines with highly energy efficient equipment. Additionally, Western Digital implemented LED installation projects in 10 facilities in 2018.

Other notable energy and carbon reduction projects during 2018 include:

- **Penang, Malaysia:** rooftop solar installation
- **San Jose, California:** LEED Silver certification
- **Laguna, Philippines:** Waste-to-energy (WtE) project achieved a 35% total avoidance of waste to landfill
- **Kuala Lumpur, Malaysia:** Chilled water piping segregation project achieved 11% energy reduction, with minimum plant shutdown, zero incidents and no production demand interruption

## **Commitments and Goals**

In 2018, we set a tactical target to achieve 1% or more energy conservation. We met and far surpassed that goal, achieving a 3% energy reduction globally. In 2019, we plan to explore strategic long-term targets, such as setting a Science-Based Target (SBT) by 2020. We are also evaluating our scope 3 emissions inventory and plan to complete the assessment in 2019.



## Internal Audits

Western Digital conducts audits of our EMS as part of our broader Integrated Management System (IMS) implementation. All Western Digital sites use IMS procedures for internal audit, controlled at the corporate level through our Central Program Office. This audit structure allows us to apply corrections and lessons learned across our numerous sites.

## Awards and Recognition



In May 2018, Environmental Leader 75 (EL 75) recognized Hiroshi Ishizuka, who has led Western Digital's Energy and Resource Conservation Program Management Office since 2014. The EL 75 recognizes industry leaders in creating new solutions, programs, platforms, best practices and products to help their companies—or other companies—achieve greater success in commercial and industrial environmental management. Ishizuka-san was recognized in part for establishing a standard reporting format for tracking energy, water and waste throughout Western Digital's global facilities, enabling him to set and track annual site-specific resource conservation targets.

**Western Digital surpassed its 1% energy conservation target in 2018, and is exploring setting a Science-Based Target by 2020.**

 A large white graphic of the number "33%" is centered on a dark background. The background features abstract, flowing lines in shades of orange, red, and blue, creating a sense of motion and energy.
 

33%

decrease in GHG emissions for HDD products from 2016 to 2018

 A large white graphic of the number "16%" is centered on a dark background. The background features abstract, flowing lines in shades of orange, red, and blue, creating a sense of motion and energy.
 

16%

decrease in GHG emissions for SSD products from 2016 to 2018

## Key Metrics

We are proud of our efforts to minimize operational energy use and the resulting emissions. We communicate our efforts with external stakeholders in our annual [CDP](#) report.

Western Digital calculated total (302-1) and allocation/intensity (302-3) using the same global location boundary methodology used in our [2017 Environmental Report](#). The data includes the main research, development and manufacturing facilities owned by Western Digital Corporation in calendar year 2018. These 21 facilities are located in the United States, China, India, Israel, Japan, Malaysia, Philippines and Thailand. As part of our ongoing integration and portfolio optimization, Western Digital closed facilities during the reporting period. Therefore, the actual location boundary differs slightly from 2017. Western Digital continues to use the Greenhouse Gas Protocol (GHG Protocol), the most widely used international accounting tool for government and business leaders to understand, quantify and manage greenhouse gas emissions.

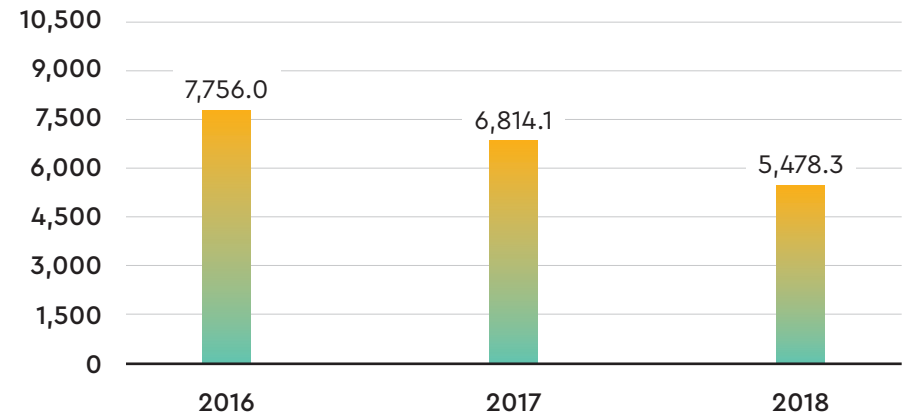
Our GHG emissions inventory was externally verified by Cameron Cole, LLC for the calendar year 2018. For the full verification report, please see our [corporate website](#).

**We have decreased our Energy Intensity by 30% since 2016.**

20

302-3

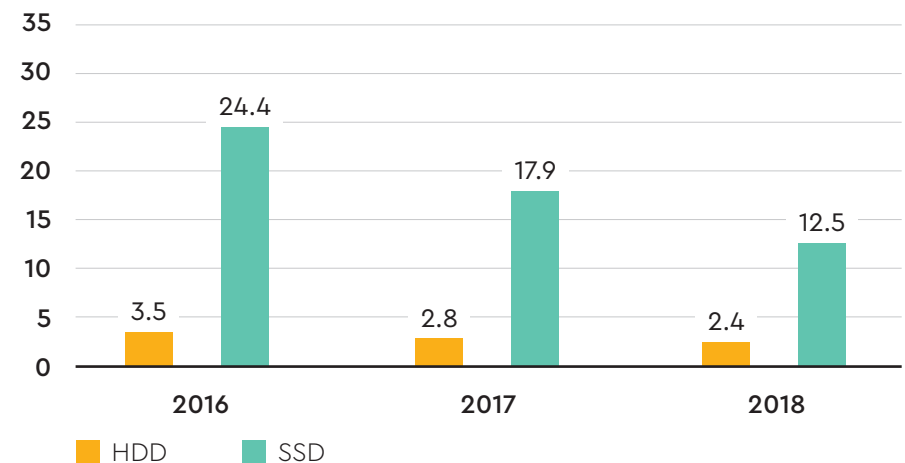
### ENERGY INTENSITY (KWH/PB)



Note: The energy intensity ratio uses energy consumption within the organization only. Types of energy included are fuel and electricity. The denominator is shipped memory capacity.

305-4

### GHG EMISSIONS INTENSITY RATIO (TONS/PB)



Note: Scopes 1 and 2 GHG emissions and all gases CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub> are included.

## ENERGY CONSUMPTION WITHIN THE ORGANIZATION

	2016	2017	2018	2016	2017	2018
	GWh			Trillion Joules		
Total fuel consumption from nonrenewable sources (gas/oil)	206.9	342.1	185.2	744.7	1,231.6	666.6
Total fuel consumption from renewable sources	0	0	0	0	0	0
Electricity consumption	2,011.8	1,988.4	2,030.2	7,242.6	7,158.1	7,308.7
◦ Electricity consumption from renewable sources	N/A	N/A	80.1	N/A	N/A	288.4
◦ Electricity consumption from non-renewable sources	N/A	N/A	1,950.1	N/A	N/A	7,020.3
<b>Total energy consumption</b>	<b>2,218.7</b>	<b>2,330.5</b>	<b>2,215.4</b>	<b>7,987.3</b>	<b>8,389.7</b>	<b>7,975.3</b>



305-1

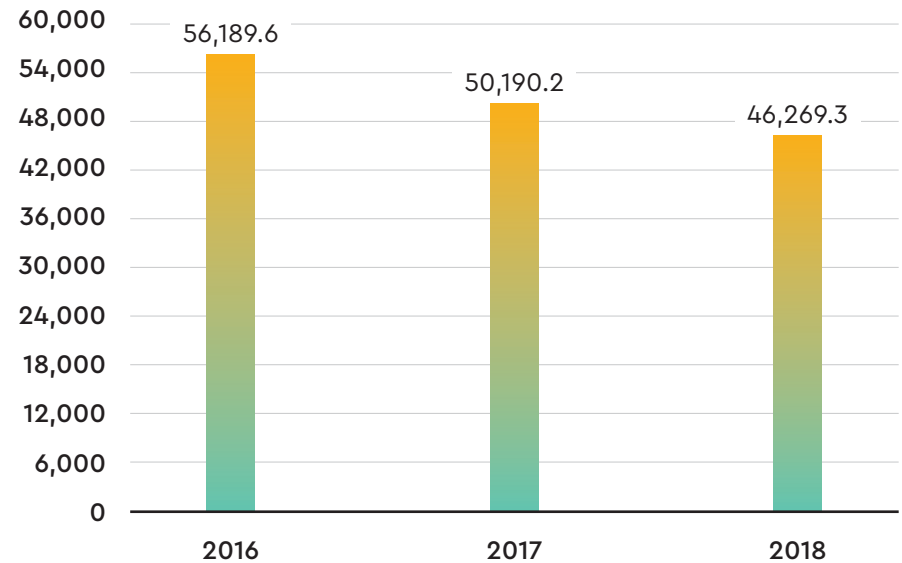
In 2018, Western Digital's direct (scope 1) GHG emissions within our operational control totaled 46,269.3 tons of CO<sub>2</sub>e—a 17% decrease from 2016. Scope 1 emissions were 50,190.2 tons of CO<sub>2</sub>e in 2017 and 56,189.6 tons of CO<sub>2</sub>e in 2016. Western Digital used the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) in compiling this data.



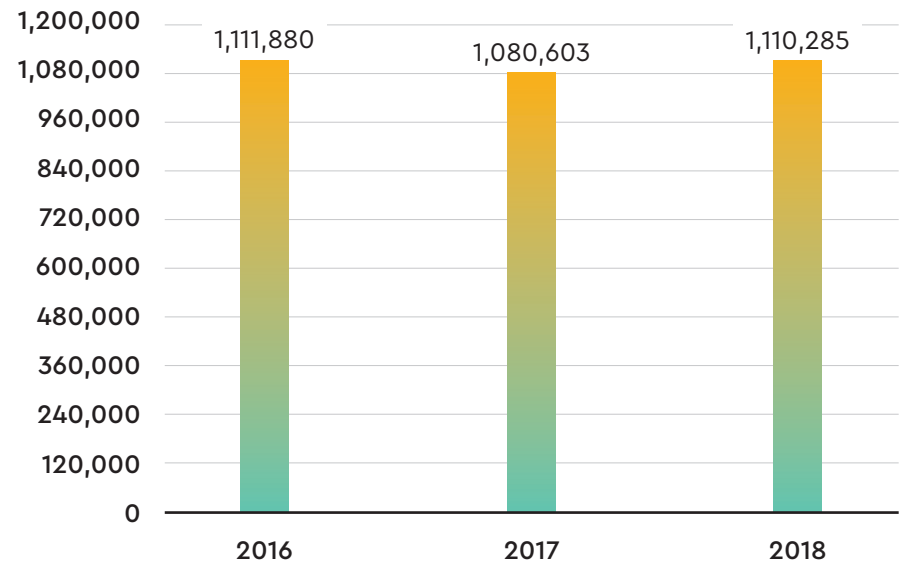
305-2

Western Digital's total location-based scope 2 emissions within our operational control equaled 1.1 million tons of CO<sub>2</sub>e. Western Digital referred to the World Resources Institute for conversion factors in our countries of operation and to the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) in compiling this data.

TOTAL DIRECT (SCOPE 1) GHG EMISSIONS (CO<sub>2</sub>e-TON)



TOTAL DIRECT (SCOPE 2) GHG EMISSIONS (CO<sub>2</sub>e-TON)



Note: All gases CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub> are included.



## TOTAL DIRECT (SCOPE 1) GHG EMISSIONS (CO<sub>2</sub>e-TON)

	2016	2017	2018	CONVERSION FACTOR
CO <sub>2</sub> (gas/oil + cleaning)	42,849.9	40,526.0	40,298.2	1
CH <sub>4</sub>	0	0	0	N/A
N <sub>2</sub> O	0	0	0	N/A
HFCs <sup>1</sup> (HFC-23/HFC-134a)	2,192.5	2,184.8	154.0 (CHF <sub>3</sub> )	3,636.36 (lbs/lbs)
PFCs <sup>1</sup>	0	0	0	N/A
SF <sub>6</sub> <sup>1</sup>	5,700.3	2,105.0	1,414.2	9,336.6 (lbs/lbs)
NF <sub>3</sub> <sup>1</sup>	34.5	3.0	8.8	3,096.0 (lbs/lbs)
CF <sub>4</sub> <sup>1</sup>	1,006.6	676.5	995.5	5,320.8 (lbs/lbs)
C <sub>4</sub> F <sub>8</sub>	14.5	5.0	23.3	6,489.0 (lbs/lbs)
HFE7100 <sup>1</sup>	3,691.5	3,805.8	2,748.7	421.0 (lbs/lbs)
HCFC-22 <sup>3</sup>	643.6	837.8	586.3	1,760 (lbs/lbs)
R-404A <sup>4</sup>	26.1	16.3	26.1	3,260 (lbs/lbs)
HCFC-123 <sup>2</sup>	30.0	30.0	14.2	79 (lbs/lbs)
<b>Total Scope 1</b>	<b>56,189.6</b>	<b>50,190.2</b>	<b>46,269.3</b>	

<sup>1</sup> Western Digital Original: Conversion factor is determined by facility based on the international technical review of abatement process in manufacturing.

<sup>2</sup> Greenhouse Gas Protocol Calculation Tools, May 2015, Global Warming Potential Values.

<sup>3</sup> IPCC fourth assessment report, 100 year number.

<sup>4</sup> IPCC Working Group3: Mitigation doc.



# Architecting a Responsible Supply Chain

The need for greater transparency is driving behavioral change in corporate supply chains, as global interconnectedness is greater than ever. Aligning with these needs,

<sup>24</sup> Western Digital's Supply Chain Compliance group rebranded itself to "Responsible Supply Chain" to go beyond conventional compliance. We define responsible supply chain as a collaborative commitment to engage with suppliers and key stakeholders to ensure that our value chain is socially responsible and sustainable in the long run.

Western Digital has an extensive in-house manufacturing network and hundreds of global production parts suppliers and contract manufacturers across the globe. We rely on our suppliers to provide the 3TG minerals, chemicals and additives, components (rare earth magnets, printed circuit boards, castings, metal parts, motors and dampers), NAND-flash memory and packaging necessary to manufacture our products. Our manufacturing and assembly facilities in China, Malaysia, Thailand, the Philippines and California develop the products we ship globally. Various stakeholders are interested in the integrity, ethics and sustainability of our supply chain, and we seek to ensure responsibility and transparency. We work extensively with our suppliers, holding them accountable to the highest standards that protect our workers, their workers, our communities and the environment.

The material topics in Western Digital's supply chain—Critical Minerals and Metals, and Human Rights and Labor Practices—share a common management approach, outlined below. We cover our topic-specific management under the relevant topics.

### **The Responsible Business Alliance**

Since 2007, Western Digital has been a member of the [Responsible Business Alliance](#) (RBA). The RBA is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains. Through the RBA,

we require our global production parts suppliers and contract manufacturers to meet numerous requirements:

- Commit to and adopt policies and programs for complying with the [RBA Code of Conduct](#), and demonstrate they have implemented an effective process to communicate the Code's requirements to their suppliers
- Register for RBA Online and complete an RBA self-assessment questionnaire (SAQ) for the facilities that support Western Digital products
- Authorize Western Digital to access the RBA facility SAQs uploaded to RBA Online and any Validated Assessment reports that support the manufacture of Western Digital products

Western Digital requires major production parts suppliers and contract manufacturers to meet additional requirements:

- Obtain certification to the most updated revision of ISO 14001 (Environmental), OHSAS 18001 (Occupational Health and Safety) or ISO 45001 Management System standards
- Undergo an [RBA Validated Assessment Program](#) (VAP) audit every two years and implement corrective action plans for any findings in accordance with RBA timelines

Our participation in the RBA goes well beyond basic membership, since we view the RBA as an invaluable partner in raising the bar of corporate responsibility throughout the world. Senior Western Digital employees have held seats on the RBA's board of directors since 2014. We also participate actively in focused task forces coordinated through the RBA, including the Responsible Labor Initiative and the Responsible Mining Initiative.

## Training

We provide training to managers and employees with direct responsibility for managing Western Digital's supply chain requirements, including the RBA Code of Conduct requirements. We encourage suppliers, contract manufacturers, labor brokers and on-site service suppliers to use the resources available on the RBA website.

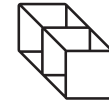
We also collaborate with RBA and peer companies to align and provide training for suppliers to meet evolving regulatory requirements:

- RBA policy on foreign migrant workers and recruitment fees
- Water stewardship; water footprint; water conservation, recycling, reuse, treatment and discharges; regulatory and compliance
- Process chemical management; chemical exposure; chemical risk assessment

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## Critical Minerals and Metals



103-1

### WHY IT MATTERS

As a leading supplier of data storage devices and solutions, Western Digital relies on a variety of raw and subsidiary materials—including tantalum, tin, tungsten and gold, known as "3TG" or "conflict minerals," which may be sourced from the Democratic Republic of Congo (DRC) and adjoining countries (collectively, the Covered Countries)—as key inputs to our finished products. We indirectly source 3TG from mines, smelters or refiners and, in most cases, are several steps removed from these market participants in the supply chain, making transparency a challenge. In 2010, long before the adoption of the SEC's Conflict Minerals Rule, Western Digital decided to prioritize responsible sourcing of conflict minerals and began working toward that goal with our suppliers. Our commitment to transparency in responsible sourcing of conflict minerals remains a key priority of our business. In fact, as an example of that ongoing commitment, in 2019, we are preparing to add cobalt to our conflict minerals policies and program.

**In 2019, we are preparing to add cobalt to our conflict minerals policies and program.**

## Industry Partnerships

Western Digital participates actively in the RBA's [Responsible Mineral Initiative \(RMI\)](#):

- Collaborate with industry working groups on a regular basis, including the Due Diligence Practices Team, Smelter Engagement Team, and Responsible Minerals Initiative Plenary Call
- Gain access to relevant data and tools, including the Access to Reasonable Country of Origin Inquiry (RCOI) data, the smelter database and risk readiness assessment
- Conduct ongoing due diligence, stay up-to-date on smelter status changes, industry trends and key insights
- Use RMI's E-Learning academy to provide training internally and externally to suppliers

## Responsibility

Western Digital maintains a cross-functional team of senior staff responsible for executing our Conflict Minerals Policy and managing our Conflict Minerals Program. Comprising representatives from Legal, Procurement and Quality Management, this team reports to senior leadership on a regular basis. Leadership of the program resides with our Senior Vice President and Chief Procurement Officer. We report the findings of our compliance efforts to the Audit Committee of the Board of Directors.

## Policies

We employ sourcing practices consistent with the expectations in our [Conflict Minerals Policy](#), which we review annually and most recently updated in 2018. This policy demonstrates Western Digital's expectations of our suppliers:

- Supply materials to Western Digital that are "DRC conflict-free"
- Require their suppliers to adopt similar policies

For more information on our Conflict Minerals Policy, please see our most recent SEC-filed [Conflict Minerals Report](#).

## Due Diligence Process

Our Conflict Minerals Due Diligence Process follows the Organization for Economic Co-operation and Development (OECD) Guidance. It involves a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas:

- Establish and maintain strong company management systems.
- Identify and assess risk in the supply chain
- Design and implement a strategy to respond to identified risks
- Carry out independent third-party audits of supply chain due diligence at identified points in supply chain
- Report annually on supply chain due diligence

For more detailed information on our due diligence program measures in 2018, including commitments and steps taken to mitigate the risk that the 3TG in our products do not benefit armed groups, please see our most recent SEC-filed [Conflict Minerals Report](#).

## Vetting and Auditing Suppliers

As part of the supplier on-boarding process, Western Digital uses the RMI Conflict Minerals Reporting Template to identify smelters and refiners in our supply chain. We require all suppliers to complete a Conflict Minerals Reporting Template or otherwise send inquiries concerning the 3TG content of the components, parts and/or products prior to making purchases from them. We categorize suppliers by internally-approved criteria, which assign risk across multiple factors, including smelter or refiner certification status, "red flags" identified and the supplier relationship. We escalate suppliers in higher risk categories in accordance with our risk mitigation procedures.

**In 2018, we audited 100% of our suppliers for conflict minerals. By year end, all suppliers reported sourcing from conformant smelters.**

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We conduct third-party Validated Assessment Program (VAP) audits of our suppliers biennially. In 2018, Western Digital also audited 100% of our suppliers for conflict minerals. We identified 21% of those suppliers using smelters of concern. By the end of 2018, all suppliers successfully reported sourcing from conformant smelters. Additionally, we engaged with 13 smelters out of 258 total in our supply chain to participate in a Responsible Mineral Assurance Process (RMAP) program.



103-3

## Awards and Recognition

In the Responsible Sourcing Network's (RSN) 2018 Mining the Disclosure Report, Western Digital ranked 1st in the HDD manufacturing industry and 4th in the overall computer hardware industry for the second consecutive year. Our overall performance scored within the "Good (60+)" threshold when compared to all industries. For more information on the RSN, please visit [their website](#).



# Human Rights and Labor Practices



103-1

## **WHY IT MATTERS**

Respecting human rights is a non-negotiable and deeply-ingrained aspect of how we do business. We work diligently to ensure that all Western Digital employees are provided with a working environment where they are treated fairly and with respect and dignity, and are provided with safe working conditions.

We do not tolerate human rights abuses, the use of slavery, forced or child labor under any circumstances and we are committed to protecting the rights of everyone at Western Digital. We are committed to fair and ethical recruiting practices to ensure potential employees are supported and protected even before they step foot on our campuses. We also work closely with our suppliers to maintain similar practices and commitment throughout our supply chain.

103-2

In addition to the shared management approach described above under Architecting a Responsible Supply Chain, Western Digital has adopted the additional practices below to manage human rights and labor practices.

## **Responsibility**

All Western Digital employees share the responsibility for protecting worker rights. We consider our employees our most valuable partners and resources, and we understand that protecting their long-term welfare is best for them, for our company and for the communities in which we operate. Our commitment to worker welfare has five main elements:

- Respectful workplace—a workplace free from harassment, discrimination and corruption, and where employees know they can speak up if they ever witness such misconduct
- Fair working conditions—responsible payment practices, full payment of recruitment fees and no activities that could be interpreted as compulsory labor
- Child protection—no child labor whatsoever
- Freedom of association
- Employee privacy

Western Digital is proud to take direct responsibility for manufacturing our products. Because our manufacturing workforce is particularly susceptible to human rights violations, we pay close attention to this population. Western Digital's manufacturing workforce is predominately composed of directly-hired employees whom we employ and manage ourselves. This gives us direct control over their working conditions, so we can ensure that they are treated with dignity and respect and experience fair and sustainable working conditions.

Western Digital's policies and procedures focus heavily on recruiting practices, where susceptible populations may need particular protection. To ensure that prospective employees are treated fairly, we predominantly use in-house recruiting teams to source candidates. We work closely with the labor brokers in both China and Malaysia to ensure the agents know and understand the necessity to protect workers' fundamental rights.

We strive to eliminate any burden recruitment fees might place on workers to ensure freely chosen employment. Since 2013, we have fully paid recruitment fees for employees and have prohibited labor brokers and their agents from collecting such fees from prospective employees. We regularly audit the brokers' practices and only collaborate with brokers who strictly uphold our full commitment to fair labor practices.

Inadequate access to passports can also impair employees' freedom. Throughout our operations, we have always allowed our employees to retain their passports but, at times, some foreign workers have asked us to hold their passports for safekeeping. To ensure no employee felt any measure of compulsion, we built secure storage lockers in the employees' housing facility to allow them to retain passports and keep them safe at all times.

**As a participant of the Responsible Labor Initiative, we collaborate with peers to develop cross-industry best practices for healthy and sustainable working conditions.**

We have also actively participated in the Responsible Labor Initiative (RLI) since its founding in 2017. The RLI is a multi-industry, multi-stakeholder initiative focused on ensuring the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted. Through the RLI, we discuss best practices, collaborate with peers to develop cross-industry standards for healthy and sustainable working conditions, and utilize shared resources to monitor our own practices and the practices of our supply chain.

We monitor our human rights and labor practices through both audits and risk assessments. The RBA audits our factories generating finished goods biennially, and these thorough reviews of our facilities and practices help us maintain high standards for protecting our employees. We hold all of our factories to those same standards, and we are now preparing to expand the RBA audits to our component factories as well.

Our periodic enterprise-wide risk assessments specifically cover forced and child labor. These assessments consider risks associated with the types of operations we have and the locations in which they are located, amongst other factors. They help us ensure our practices are aligned with our deep commitment to protect the rights of our workforce and create a positive and safe working environment for everyone. We have internal processes to manage any human rights or labor-related risks discovered through risk assessments or audits by developing targeted corrective action plans and tracking our progress against them.

## Policies

Western Digital has a set of tiered policies regarding human rights. We set forth expectations for all Western Digital employees in our Global Code of Conduct, on which all employees receive annual training. We publish our Global Code of Conduct in eleven languages to ensure its accessibility to all our employees. Country-specific policies and work rules, and factory-level policies, reinforce our commitment to treat all employees with dignity and respect. We also expect all suppliers to comply with the RBA Code of Conduct, which establishes respected standards on human rights and labor practices. And to continue to improve accountability and transparency in the area of human rights, Western Digital is currently developing a standalone global human rights policy.

Each factory's general manager commits to abiding by Western Digital's Global Code of Conduct, the RBA's Code of Conduct and country-specific Work Rules. This set of policies ensures that all our manufacturing workers can thrive in an environment that has the highest standards of labor practices. Our company policies adhere to applicable local labor laws and conform to the RBA Code of Conduct.

These policies include a strict prohibition on child labor, a focus on eliminating human trafficking and forced labor in both our operations and supply chain and fair employment practices, including fair recruiting practices and fair payment of wages.



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suppliers trained on the  
RBA Code of Conduct

## Vetting and Auditing Suppliers

Western Digital requires our suppliers to comply with the RBA Code of Conduct to reduce the risks of human rights abuses and forced or child labor throughout our supply chain. We disclose our supply chain practices in accordance with the UK Modern Slavery Act of 2015 and the California Transparency in Supply Chain Act. Each year, we send a letter to all suppliers about our commitment to the RBA Code of Conduct and the UK Modern Slavery Act, and require suppliers representing 80% of our cumulative spend to conduct annual self-assessments and biennial RBA VAP audits.

RBA provides its official audit report based on the RBA's standard VAP soon after completion of the supplier audit, and we monitor progress through our online database, the RBA-ON system. If labor issues exist, we follow standard RBA procedures to assure suppliers' timely correction of non-conformance issues and closely follow up with suppliers. We are pleased to report zero findings of incidents of child labor in any of our supply chain in the past five years.

We also rely on third-party verifiers such as Auditee Managed Audit (AMA) and our own staff to conduct audits of key suppliers and contract manufacturers. Additionally, we engage with and conduct periodic audits of labor brokers, and providers of on-site services, such as cafeteria, janitorial cleaning and security services.

## Key Metrics


### SUPPLIERS ASSESSED USING RBA VALIDATED ASSESSMENT PROGRAM (VAP)

SASB CODE	ACCOUNTING METRIC	2016	2017	2018
TC-HW-430a.1	a. Percentage of all Tier 1 supplier facilities audited in the RBA Validated Assessment Program (VAP) or equivalent <sup>1</sup>	23%	48%	87%
	b. Percentage of high-risk Tier 1 supplier facilities audited in the RBA Validated Assessment Program (VAP) or equivalent <sup>2</sup>	N/A	N/A	N/A
TC-HW-430a.2	1. Tier 1 suppliers' non-conformance rate with the RBA Validated Assessment Program (VAP) or equivalent	-	11%	8%
	2. Tier 1 suppliers' associated corrective action rate for (a) priority non-conformances	-	76%	100%
	3. Tier 1 suppliers' associated corrective action rate for (b) other non-conformances	-	84%	93%

<sup>1</sup>Total supplier facilities encompass 80% of direct materials spend.

<sup>2</sup>The RBA Online SAQ identified 0 high risk facilities for Western Digital.





Western Digital holds our own manufacturing facilities to the same high standards as our suppliers. In RBA's 2018 closure audits of our factories, Western Digital received one Platinum, two Gold and two Silver certificates, demonstrating excellence in labor, health and safety, environment, ethics, and management systems.



# Architecting a Stronger Workforce

Our people are Western Digital's most important asset. 2018 was a milestone year for our workforce: we focused on creating a unified culture, amplifying the best aspects of our three legacy companies, and architecting our path forward as one Western Digital.

# Health and Safety



103-1

## **WHY IT MATTERS**

Employee health and safety is foundational to Western Digital's business. We take employee, contractor and visitor health and safety seriously because we care about our people. We believe that safety is everyone's business, and aim to create a culture that supports best-in-class health and safety workplace standards and processes. This includes safety education, safe working conditions and employee well-being and health resources.

103-2

## **Responsibility**

Because we believe safety is a shared responsibility, management and all other employees participate in maintaining a safe and healthy work environment. We expect every manager at Western Digital to establish and reinforce the "health and safety culture" through three commitments:

- Implementing and enforcing Western Digital's Environmental, Health, Safety & Security (EHS&S) program requirements, leading by personal example
- Encouraging worker involvement in the structure and implementation of EHS&S programs
- Communicating and assigning responsibility for EHS&S program implementation, and evaluating performance against expectations

## **Policies**

Western Digital's IMS Policy addresses occupational health and safety in support of our IMS approach. Additionally, we require all employees to adhere to Western Digital's Global Code of Conduct, which includes the expectation to follow site safety rules, use necessary safety equipment and report actual or potential safety hazards.

403-1

## **Occupational Health and Safety Management System**

Western Digital's approach to managing occupational health and safety demonstrates industry leadership. Our certified Occupational Health and Safety (OHS) Management System is part of our company-wide IMS. The OHS Management System applies to all operations, all employees and anyone acting on our behalf globally (including contractors).

Western Digital achieved multi-site certificates for each of the key international standards, including the Occupational Health and Safety Assessment Series (OHSAS). All Western Digital factories are certified to the OHSAS 18001 standard, and will be transitioning to ISO 45001 beginning in 2019.

Western Digital also conducts both internal and external audits to evaluate compliance with applicable health and safety laws and regulations.

## Hazard Identification and Risk Control

Our IMS involves a two-tiered approach for identifying hazards and assessing risks. At the corporate level, we analyze performance trends to identify the top three to five focus areas globally—based on risk levels, severity and likelihood. We set overarching procedures we expect sites to follow using the traditional hierarchy of controls.

At the facility level, sites assess each hazard identified at the corporate level and customize based on high-hazard risk areas in the specific location. Certain sites go beyond, assessing specific equipment, tools, chemicals and process risks. Sites score each hazard on its level of severity and likelihood to develop a composite risk rating. We prioritize risks rated high, seeking immediately to mitigate them to a medium risk level. We address medium risks as the next priority.

All Western Digital manufacturing processes have a standard "Emergency Power-Off" (EPO) or "Emergency Machine Off" (EMO) switch we train employees to use if an appropriate hazard is identified. Additionally, employees have three avenues through which to report work-related hazards:

- Human Resources
- Manager
- Western Digital's business partner
- Western Digital's Ethics Helpline

**All Western Digital factories are certified to the OHSAS 18001 standard, and will be transitioning to ISO 45001 beginning in 2019.**

All employees have a right to remove themselves from work situations they believe could cause injury or ill health.

Our management team also conducts worksite analysis on a regular basis:

- Conduct periodic "walk-through" of assigned areas, observing worker behaviors and identifying potential unsafe conditions
- Conduct periodic, systematic EHS&S assessments, and ensure we correct discrepancies in a timely fashion
- Ensure new processes, facilities rearrangements and equipment receive EHS&S reviews and approval prior to use
- Provide timely, appropriate responses when workers notify management about conditions that appear unsafe or hazardous
- Investigate accidents and "near misses," identifying and correcting root causes

Western Digital hires contractors and third parties for specific projects and/or jobs that require expertise outside our employee base or based on business strategy. Our OHS planning process includes evaluating and mitigating potential hazards and risks from these third-party business relationships. We evaluate the hazards related to the specific job or project, review the activity area and check licenses of all operators. For chemical transport, we require rigorous driver certifications before transporting chemicals or waste.

## Communication and Training

Western Digital communicates with employees on general health and safety policies, procedures and instructions through many avenues:

- In-person training and web-based training
- Periodic communications on IMS via Western Digital's intranet
- Promotion on our internal broadcast system, ConnectTV
- Internal blogs
- Monthly newsletters

Communication topics include occupational health and safety, emergency preparedness, injury or illness prevention, industrial hygiene, physically demanding work, wellness, machine guarding and living conditions.

Western Digital forms safety committees at each worksite. Each safety committee comprises cross-functional teams of employees who meet regularly to discuss hazards observed in their work areas and implement preventative actions. Safety committee members work with health and safety personnel to keep track of injuries, assess their root causes and recommend corrective actions to avoid future recurrences. Committee members also conduct periodic facility inspections and organize safety activities.



403-5

Each site's Occupational Health and Safety Management program identifies job-specific and task-specific training to employees. Training meets Western Digital's objectives:

- Ensure all workers understand the hazards to which they may be exposed, and how to prevent harm to workers and environment
- Ensure on-time periodic worker training updates as required within specific programs
- Ensure all managers and workers understand their obligations are to ensure a safe, healthful and compliant work environment
- Provide timely, appropriate responses when workers notify management about conditions that appear unsafe or hazardous

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Western Digital trains our Emergency Response Teams (ERTs) to respond to an incident (such as a fire, medical crisis, earthquake, etc.) and minimize its impact. ERTs assist in developing plans to organize an effective response and minimize injury and damage in the event of an incident.

403-3

403-6

## Occupational Health

Our focus on employee health has always been strong, but it has become expansive over the last several years. We work to continuously improve the quality of Western Digital's health and wellness services to protect the

long-term wellbeing of our employees. Western Digital's site management, with EHS&S support, performs regular evaluations of the work environment to minimize exposures to chemical, physical, biological and ergonomic stresses.

Western Digital's manufacturing and development sites in Asia have in-house clinics with certified or licensed medical professionals where workers can obtain immediate treatment. If work-related activities cause injuries, our medical professionals engage the site EHS&S team to investigate and correct the root cause and contributing factors. Additionally, sites in the United States have contracted occupational health clinics serving the same function with similar processes. All medical professionals working either in on-site clinics or contracted clinics meet licensing requirements.

103-3

## Key Metrics

We deeply care about the wellbeing of our employees and other workers, and Western Digital actively tracks our occupational safety and health performance to ensure the effectiveness our management approach. We are pleased to report industry-leading safety performance.

403-8

	2016	2017	2018
Workers covered by an occupational health and safety management system	100%	100%	100%



	2016		2017		2018	
<b>Employees</b>	#	%	#	%	#	%
Employee fatalities	0	0	0	0	0	0
High-consequence work-related injuries (excluding fatalities) – employees	0	0	1	0.001	2	0.002
Employee LTIR <sup>1</sup>	43	0.06	38	0.05	48	0.05
Recordable work-related injuries (including fatalities) – employees	72	0.1	84	0.12	85	0.09
Employee TRIR <sup>1</sup>	72	0.10	84	0.12	85	0.09
Main types of work-related injury – employees	Slip/Trip/Fall, Struck/on/by, Machine safety, Material Handling/Ergo					
Total number of hours worked – employees	140,982,000		142,465,634		196,706,381	
<b>Non-Employee Workers</b>	#	%	#	%	#	%
Non-employee worker fatalities	1	0	0	0	0	0
High-consequence work-related injuries (excluding fatalities) – non-employee workers	0	0	0	0	0	0
Recordable work-related injuries (including fatalities) – non-employee workers	N/A	N/A	10	N/A	23	N/A
Work-related hazards that pose a risk of high-consequence injury	Slip/trip/fall (s/t/f) hazards and repetitive trauma hazards identified through hazard identification and risk assessment. Actions taken to minimize risks include: <ol style="list-style-type: none"> <li>1. Design and evaluate workplace to eliminate s/t/f hazards</li> <li>2. Design and evaluate workplace and stations to eliminate repetitive trauma hazards</li> <li>3. Create work instructions, training/communicate with workers to identify and eliminate s/t/f and repetitive trauma hazards</li> <li>4. Periodic inspection/walk-through to verify that workplace is free from hazards</li> <li>5. Take corrective and preventive actions to eliminate the hazards</li> </ol>					
Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked	200,000					
Any workers excluded from this disclosure (and why)	0		0		0	

<sup>1</sup> Employee LTIR and TRIR are OSHA Standards.

Note: Western Digital currently does not track main types of work-related injury or total number of hours worked for non-employee workers.

# Talent Attraction, Engagement and Retention



103-1

## **WHY IT MATTERS**

At Western Digital, our employees drive our success and shape the future. To continue leading the data storage infrastructure industry, we rely on highly skilled individuals to drive our culture of innovation. We strive to create an environment where employees feel connected and committed to Western Digital's mission and vision.

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103-2

## **Responsibility**

Over the course of 2018, we transformed our Human Resources (HR) strategy to foster higher workforce impact.

This new strategic focus aims to elevate our Human Resources function into a more strategic partner to our business, creating a strong workforce culture after the integration of our three legacy companies, and differentiating ourselves as an employer of choice in the future. We redeployed our Human Resources spend into strategic areas, including creating two new functional areas focused on culture and people strategy and diversity and inclusion. We also upskilled and upgraded each as a true

work stream of the department. Part of this transformation includes building a more cohesive business strategy planning process that addresses talent needs and assesses sustainable and scalable workforce strategies.

Our Board of Directors takes active involvement in Western Digital's workforce retention and engagement. Our Chief Human Resources Officer (CHRO) communicates regularly with the Board on our retention strategy progress, as well as talent management, succession planning and diversity.

## **Engagement**

Western Digital's approach to employee engagement intertwines with the onset of our new culture and people strategy initiative. We believe being transparent with our employees fosters engagement and trust. Western Digital's Executive Leadership Team subscribes to an Organizational Health Model to effectively build a cohesive leadership team at the top level, establish clarity among our leaders and communicate clarity throughout the organization. For example, immediately following our quarterly earnings releases, Western Digital holds a global employee town hall led by the CEO. These meetings inform employees of the direction of the business, highlight our successes and share progress toward goals and objectives. Immediately following town hall meetings, each Western Digital functional leader holds an all-employee meeting to ensure further transparency and clarity within each business function. We publish all meetings on Western Digital's intranet for employees to access at any time.

## Attraction and Retention

Critical to our business is attracting and retaining a diverse range of high-quality candidates to sustain an innovative and skilled workforce. Western Digital's talent acquisition team partners with our business leaders to attract top talent for all areas of the business. Our global enterprise recruitment branding highlights Western Digital employees in the campaigns. Additionally, our partnership with universities across the globe is a strategic initiative for future talent pools.

Turnover rates indicate the health of our workforce culture, and we monitor these carefully for insights into employee uncertainty or dissatisfaction. Additionally, turnover rates impact Western Digital's financial performance. In general, our worldwide turnover rate for voluntary turnover is 8%, below the industry average of 10-12%.

401-2

Western Digital offers competitive benefits in each country, which typically include:

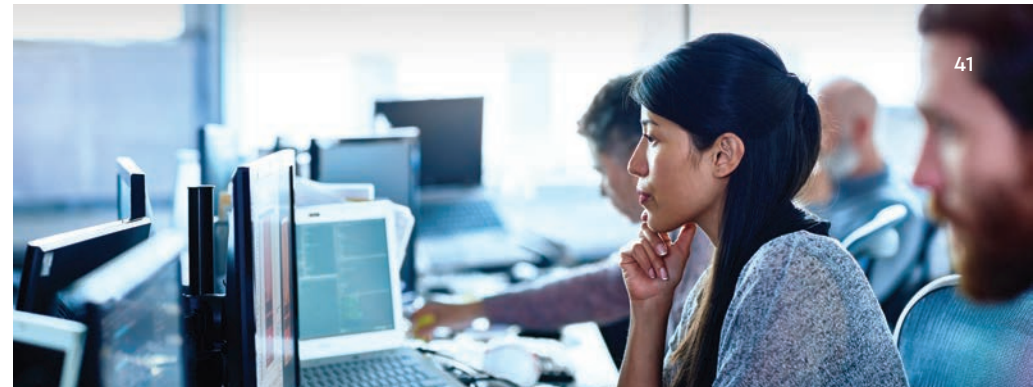
- Life insurance
- Health care
- Disability and invalidity coverage
- Parental leave
- Retirement provision
- Stock ownership
- Tuition reimbursement

**In 2018, Western Digital had a voluntary turnover rate 2% lower than the industry average.**

404-2

## Training and Development

Western Digital's Global Management Development Program, introduced in 2017, is our first enterprise-wide career development program as a combined company. This program, facilitated by our regional HR Delivery teams, helps provide newly-hired or promoted managers the skills and tools to become successful people leaders. The 35-hour program includes six modules delivered over two-to-three months to allow for time between modules for participants to apply what they learn in practice. Over 940 managers across the globe completed the training through April 2019.



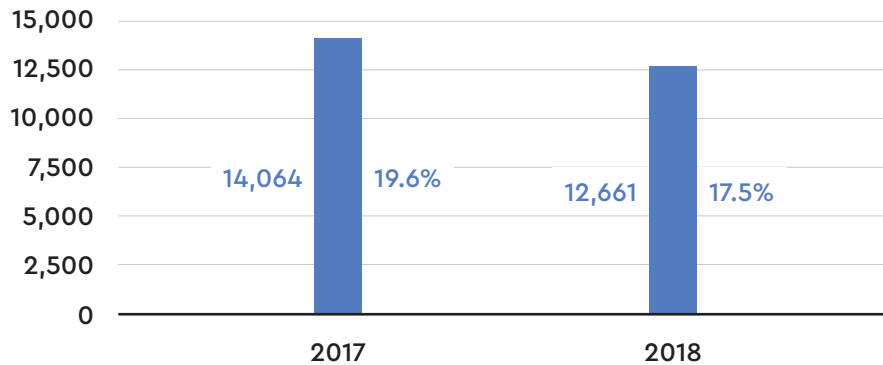
404-3

All manufacturing employees receive performance assessments based on specific manufacturing tasks. The remainder of the organization receives quarterly check-in meetings and annual reviews supported by manager documentation.

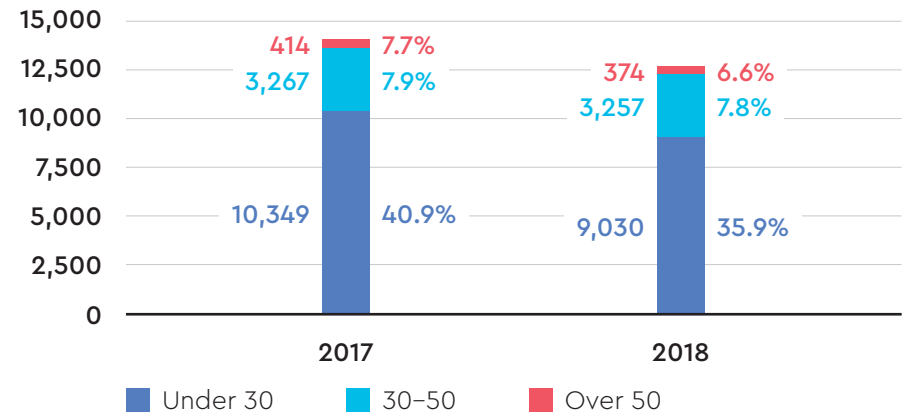
## Key Metrics

Western Digital carefully monitors our employment statistics as one measure of our management effectiveness.

### TOTAL EMPLOYEE HIRE RATES<sup>1</sup>



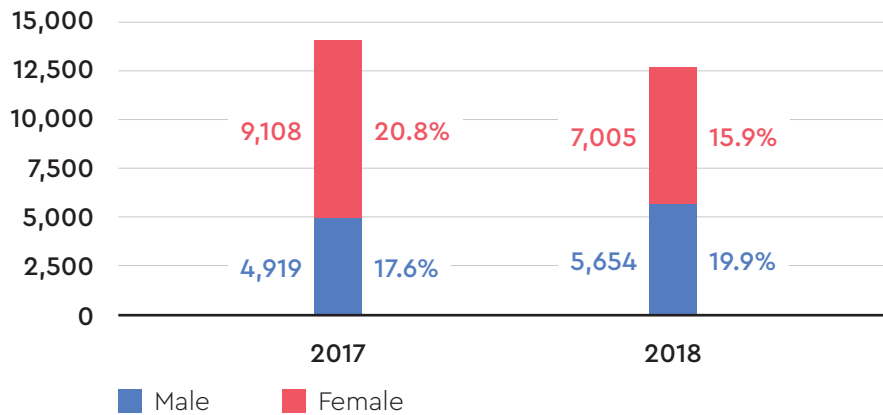
### EMPLOYEE HIRE RATES BY AGE GROUP



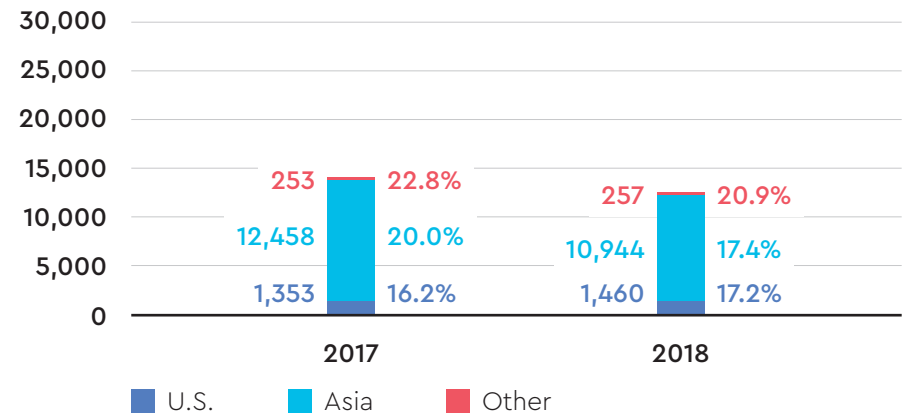
42

Note: Employees without gender or birthdate in the source data included in Total only and not in age, gender, and region breakouts.

### EMPLOYEE HIRE RATES BY GENDER

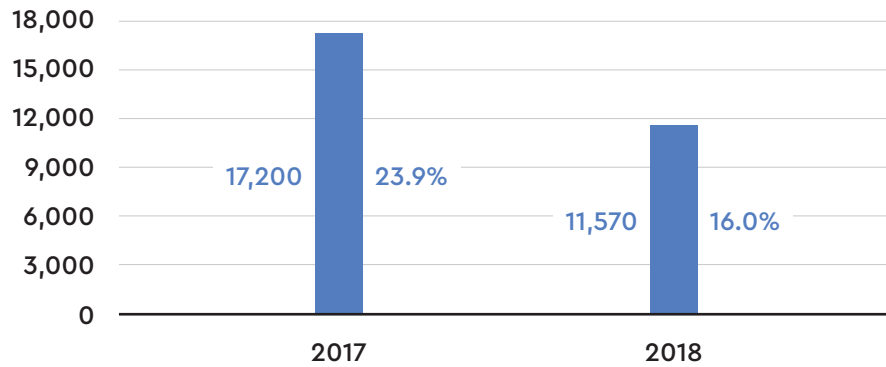


### EMPLOYEE HIRE RATES BY REGION



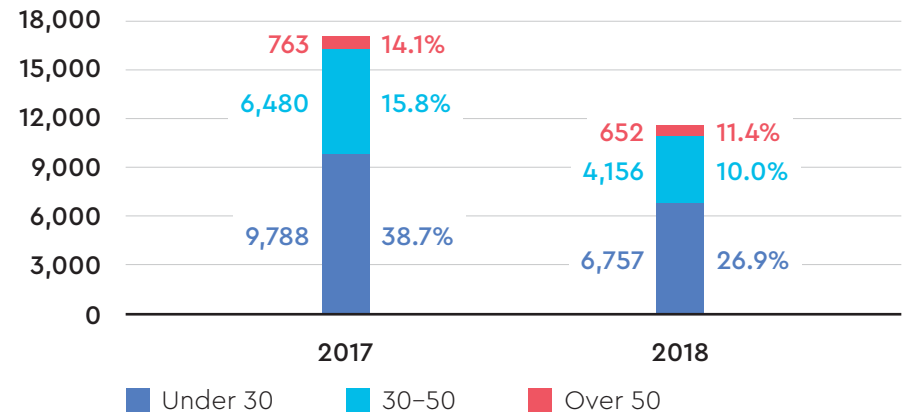
<sup>1</sup>Hire rate is calculated as the total number of hires divided by the average headcount over the time period.

### TOTAL EMPLOYEE TURNOVER RATES<sup>2</sup>

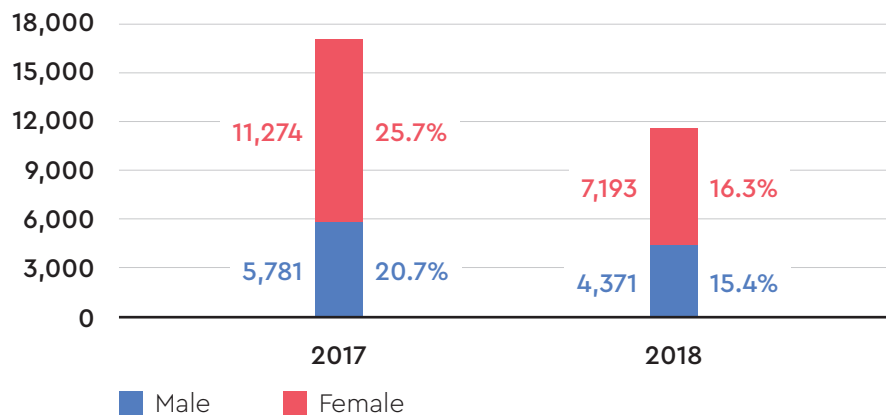


Note: Employees without gender or birthdate in the source data included in Total only and not in age, gender, and region breakouts.

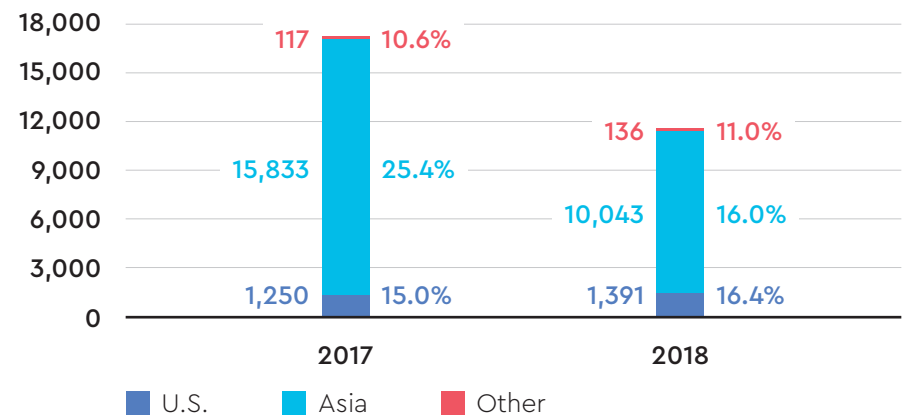
### EMPLOYEE TURNOVER RATES BY AGE GROUP



### EMPLOYEE TURNOVER RATES BY GENDER



### EMPLOYEE TURNOVER RATES BY REGION



<sup>2</sup>Turnover rate is calculated as the total number of separations/terminations (voluntary and involuntary) divided by the average headcount over the time period.





2%

lower voluntary employee turnover  
rate than the industry average

44

10%

decrease in employee turnover  
from 2017 to 2018

# Diversity and Inclusion



103-1

## **WHY IT MATTERS**

As a global company with over 60,000 employees, diversity is a big part of what got us here and will power Western Digital forward. The more diverse our backgrounds and our experiences, the more opportunity we have for success. We want employees who see the world differently, and who thrive in a collaborative and respectful work environment where everyone is valued. We are committed to creating a culture of belonging for all of our employees—all genders, races, ages and any other dimension of diversity—across all levels of our organization.

103-2

## **Responsibility**

In 2018, we focused on formalizing the structure of our Diversity and Inclusion business function, ensuring leadership alignment, harmonizing processes and developing our strategic path forward. We hired our first-ever Vice President of Diversity and Inclusion, who is responsible for executing Western Digital's global diversity and inclusion strategy.

We developed a stronger Board of Directors focus on diversity and inclusion as part of our corporate commitment, identifying how diversity fits into our overall Human Resources and corporate strategy. Western Digital's Chief Human

Resources Officer provides regular updates to the Board, reporting progress on the diversity initiatives that reflect our commitment.

Part of formalizing Western Digital's Diversity and Inclusion business function involved setting our strategy and developing plans for execution. We are proud to share key highlights from 2018:

- Implemented unconscious bias training
- Expanded our Employee Resource Groups (ERGs)
- Created a Women's Leadership Development Program
- Initiated the development of strategy to increase diversity in our candidate pipeline
- Implemented a pay equity analysis

## **Policies**

Our senior leadership team endorsed Western Digital's Diversity and Inclusion Statement company-wide, demonstrating our shared commitment to ensuring an inclusive work environment for all employees.

Each country-specific employee handbook discusses how Western Digital is working to ensure workforce diversity. It describes our commitment to ensuring everyone can succeed, regardless of race, ethnicity, gender, religious beliefs, sexual orientation, disability or any other legally protected characteristics.

In 2019, Western Digital will implement a new harmonized harassment and discrimination statement, as well as harassment and discrimination training for all employees.



## Expanding Diversity With External Partners

Diversity and Inclusion (D&I) continues to grow our relationships with external partners that support our D&I strategy and optimize employee growth and development. Through our local, regional and global partnerships, our employees have the opportunity to leverage conferences and on-line web learning, participate in panel discussions and deliver keynote messages. In 2018, nearly 700 employees from around the globe participated in conferences such as Grace Hopper U.S., Grace Hopper India, Girl Geek, Women in Technology International, Watermark, Shanghai-Ladies Who Tech and others.

## Unconscious Bias Training

Our entire organization, including our executive leadership team, is invested in unconscious bias training to build an inclusive culture that supports diversity. We implemented our unconscious bias training program for 400 senior leaders across the globe, equipping them to lead inclusively and to fully understand how to communicate and get the best out of every employee. Leading without bias allows us to arrive at the best business outcomes for our teams and, ultimately, the company. Based on the program's success, we are currently exploring new ways to extend unconscious bias training to leaders in additional areas of the business, from talent acquisition staff to manufacturing employees.

## Employee Resource Groups

Western Digital strives to create a culture of belonging. We communicate to our employees about our Employee Resource Groups (ERGs) by holding events, posting blogs, and sharing monthly videos to increase awareness. Our seven employee networks include 20 global chapters at sites in countries such as India, China, Israel, Thailand, Malaysia and the Philippines:

- Women's Innovation Network (WIN)
- Black Employees Network (BEN)
- We.EQL (LGBTQ employees)
- Pathfinders (early career employees)
- Hispanic Latino Network (HLN)
- Veterans Network
- Disabilities Network

ERGs serve as a platform for employees to build relationships and connections, foster a sense of belonging and develop ways to support our business. All Western Digital ERGs are open to any employee interested in joining.



## Women's Development Programs

Western Digital is committed to expanding the number of women in technical fields and leadership positions at our organization. We plan to accomplish this by focusing on development of the women within Western Digital and by attracting more women from outside the company to take leadership roles. With the current women working at Western Digital, we are launching our Advancing Women in Leadership program in 2019. The program helps develop the skills necessary for women to rise within the organization and emphasizes ways their leaders can be accountable for their career development.

In addition, women are exposed to several development opportunities through organizations such as our Women's Innovation Network, which advocates for women's advancement and supports the professional development of women, by offering external conference opportunities for learning, networking, coaching and internal leadership experiences. In 2019, our Women's Innovation Network will focus on expansion to better serve Women in Information Technology (IT) and Women in Tech-Engineering.

## Growing Our Diverse Talent Pipeline

We actively seek to increase the diversity of our talent pool, from interns to executive leadership roles. Our Recruiting, Human Resources Business Partners, and Diversity and Inclusion centers of excellence are partnering to rework our strategy for growing a more diverse candidate pipeline and recruiting the best and brightest across world. From a university recruitment standpoint, we implemented an initiative to strengthen partnerships with diversity-focused clubs at our target universities.

103-3

## Awards and Recognition

### The Human Rights Campaign (HRC)

#### Best Places to Work for LGBTQ Equality

The Human Rights Campaign awarded Western Digital a perfect score on diverse and inclusive workspace for LGBTQ employees. HRC reviewed over 1,000 company policies on harassment and discrimination to determine scores. Western Digital implements an overarching global policy supported by country-specific policies that either meet or exceed country requirements.



47

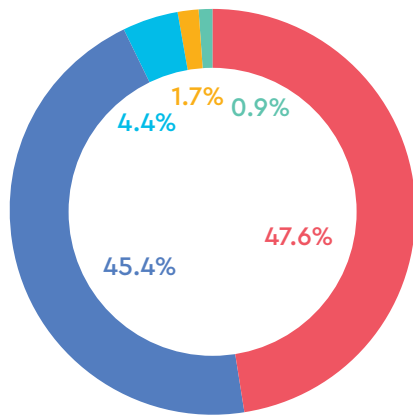
### Women's Choice Award Best Company for Millennials

Women's Choice Award recognized Western Digital as a Best Company for Millennials. Our focus on investing and helping millennial women grow professionally to advance their career while also catering to their lifestyle led to this award. Women's Choice Award recognizes companies based on a gathering of external data from the general population, analyzing over 300,000 sources of data—including Fortune 300 Companies, Survey Monkey, Working Mothers Best Place to Work reports, Glassdoor, annual reports and press releases.

## Key Metrics

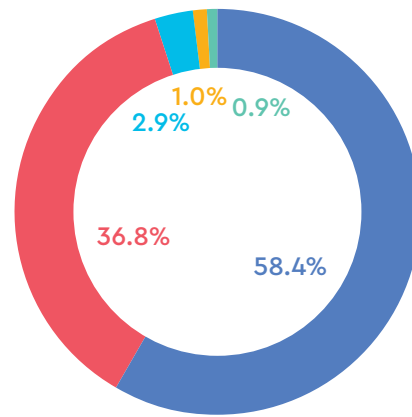
### RACIAL/ETHNIC GROUP REPRESENTATION OF U.S. EMPLOYEES

Management



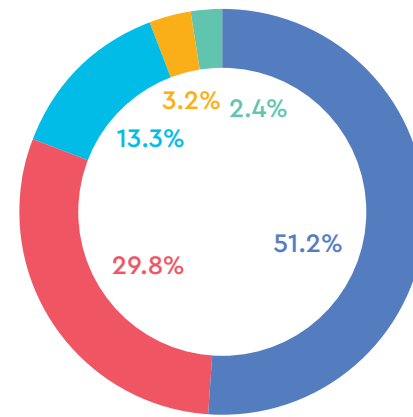
- Asian
- White
- Hispanic/Latino
- Black/African American
- Other<sup>1</sup>

Technical Staff



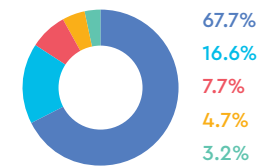
- Asian
- White
- Hispanic/Latino
- Black/African American
- Other<sup>1</sup>

All Other Employees



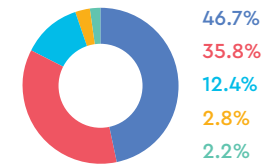
- Asian
- White
- Hispanic/Latino
- Black/African American
- Other<sup>1</sup>

Factory Employees<sup>2</sup>



- Asian
- White
- Hispanic/Latino
- Black/African American
- Other<sup>1</sup>

Non-Factory Employees



- Asian
- White
- Hispanic/Latino
- Black/African American
- Other<sup>1</sup>

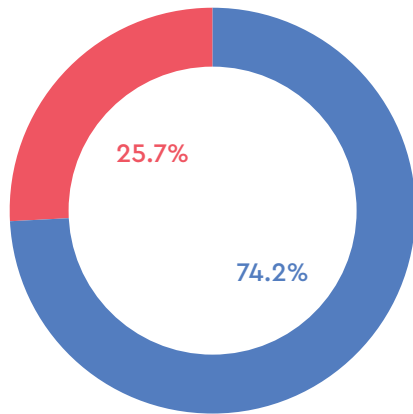
<sup>1</sup> Other includes the classifications: Native American or Alaska Native, Native Hawaiian or Pacific Islander, and "Two or More Races".

<sup>2</sup> For purposes of this report, "factory employees" are those working in our factory setting that directly work on product assembly; all remaining employees are considered "professional or managerial."



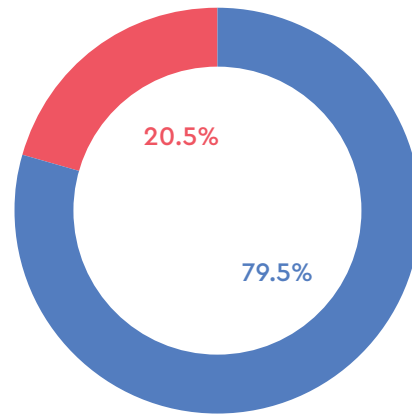
## GENDER REPRESENTATION OF GLOBAL EMPLOYEES

Management



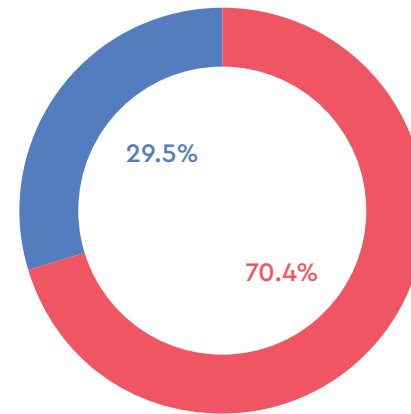
Male Female

Technical Staff



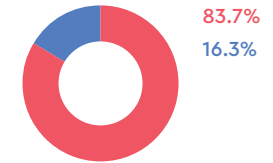
Male Female

All Other Employees



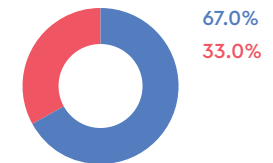
Male Female

Factory Employees



Male Female

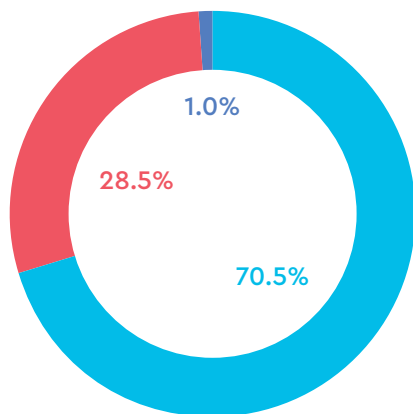
Non-Factory Employees



Male Female

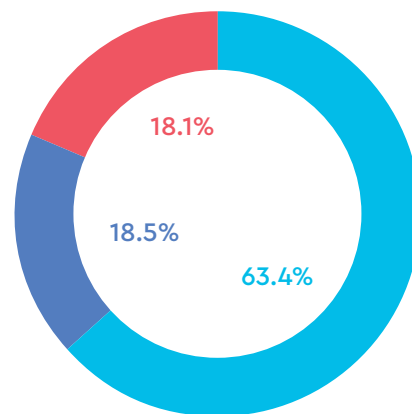
## AGE REPRESENTATION OF GLOBAL EMPLOYEES

Management



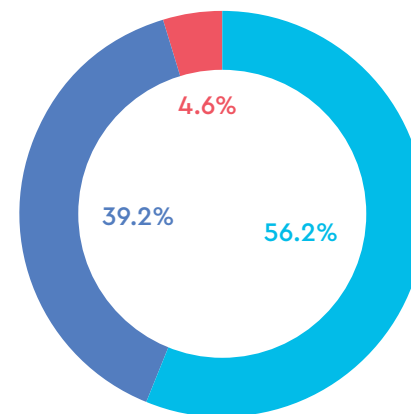
Under 30 30-50 Over 50

Technical Staff



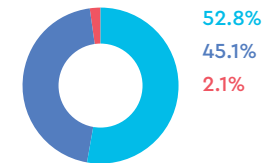
Under 30 30-50 Over 50

All Other Employees



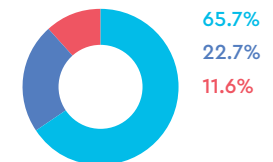
Under 30 30-50 Over 50

Factory Employees



Under 30 30-50 Over 50

Non-Factory Employees



Under 30 30-50 Over 50

# Architecting an Ethical Business

At Western Digital, working with integrity is a part of our culture—one that we work hard to maintain and enhance. Our efforts help earn the trust of our customers and business partners, inspire our employees, deliver value for our shareholders and improve our communities.

# Ethics and Integrity



102-16

While delivering business results is always a driving focus at Western Digital, we believe how we achieve results is equally important. For that reason, we invest strategically in a robust and effective ethics and compliance program.

This program focuses on strategic risk areas identified during regular risk assessments, including intellectual property, anticorruption, antitrust, data privacy and trade compliance. The program is overseen by a Chief Compliance Officer who has a dotted-line (secondary) reporting relationship with the audit committee of our board of directors, assuring independence of that function.

The ethics and compliance program guides our ethical culture, in part, by developing and publishing a [Global Code of Conduct](#). We designed this keystone policy document to be a unifying guide that helps every employee, manager and senior leader understand our ethical and legal obligations to each other, our business partners, company, industry and community. It provides an ethical and behavioral framework anchored in our core values.

We provide a copy of the Global Code of Conduct, available in multiple languages, to each Western Digital employee, including those of domestic and foreign subsidiaries. New employees receive the Global Code of Conduct when they join the company and every employee reviews it annually.







## World's Most Ethical Companies

The Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices, recognized Western Digital this year as one of the [World's Most Ethical Companies](#). This was our first year completing the assessment, and we are proud to be recognized for our strong culture of ethics and integrity.



While most companies have a code, we are proud to implement ours through a unique approach that combines positive incentives and extensive internal communication. We designate one month each year as Compliance Awareness Month. During this month, we sponsor a wide variety of activities around the world that celebrate Western Digital's commitment to ethics and integrity.

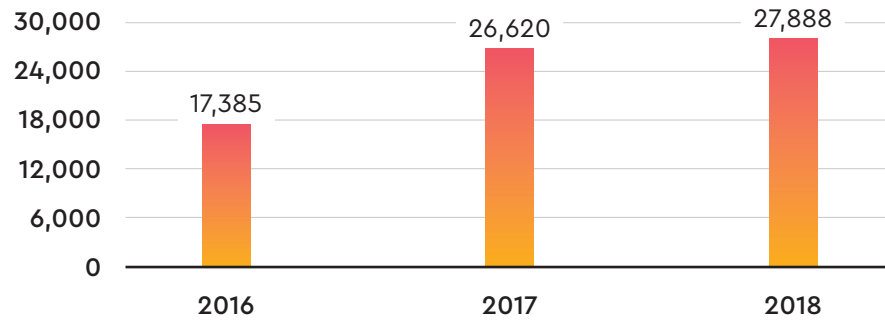
During Compliance Awareness Month, we assign all professional and managerial employees<sup>1</sup> mandatory online training covering the importance of our non-retaliation policy, avenues to report concerns and other Global Code of Conduct topics. In 2018, the online training focused on confidential

information, social media, data privacy, trade (import/export), antitrust and anti-corruption. We also offer instructor-led training for our factory employees, and we coordinate fun, inspirational communications and activities on these same topics for all employees at our sites around the globe.

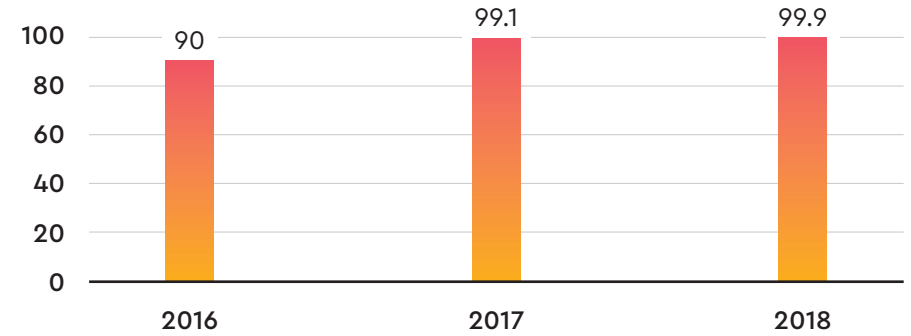
During our month devoted to ethics and compliance, we sponsor a wide variety of activities around the world that celebrate our commitment to ethics and integrity.

## GLOBAL CODE OF CONDUCT TRAINING

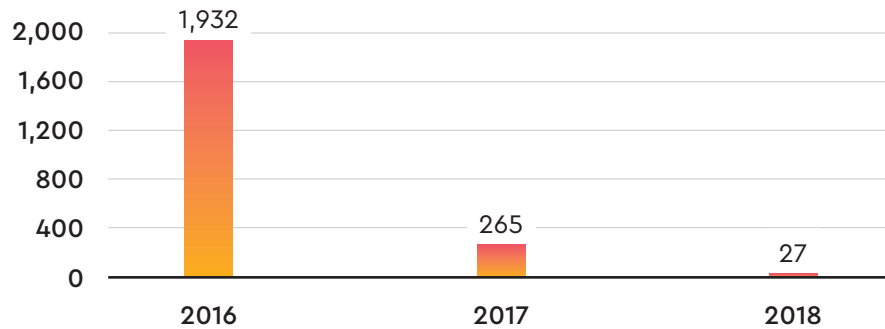
Number of Professional and Managerial Employees Assigned Online Global Code of Conduct Training



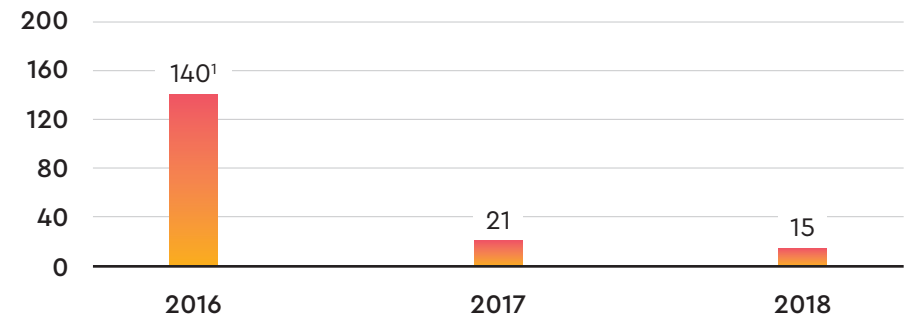
Percent of Training Completed by Month-End Deadline



Number of Employees Not Finished by Deadline



Time Required to Reach 100% Training Completion (Days)

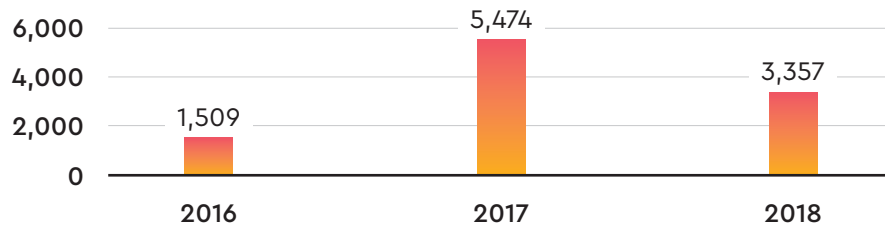


<sup>1</sup> Approximation



We also provide training throughout the year based on risks, requests and/or changes in circumstances. For example, we train people managers in person every other year on ethical topics relevant to their managerial responsibilities, including the importance of creating an open, ethical atmosphere on their teams, and how to respond when an employee raises an ethical concern. In 2018, we also provided targeted live training on topics including antitrust, anti-corruption, business courtesies, data privacy and confidentiality.

#### NUMBER OF EMPLOYEES RECEIVING IN-PERSON TRAINING



Beyond our training, each year Western Digital's Audit Committee requires senior members of management and several thousand key designated employees worldwide to complete an online questionnaire certifying compliance with the provisions of the Global Code of Conduct and making necessary disclosures. Our Chief Compliance Officer and Chief Legal Officer oversee compliance of this certification process.

Our [Code of Business Ethics](#) also sets an expectation for directors, officers and employees to demonstrate honest and ethical conduct. Each of us shares responsibility for safeguarding our company's valuable reputation, and we have purposefully set a consistent tone and culture across more than 60,000 employees globally.

### Raising Concerns

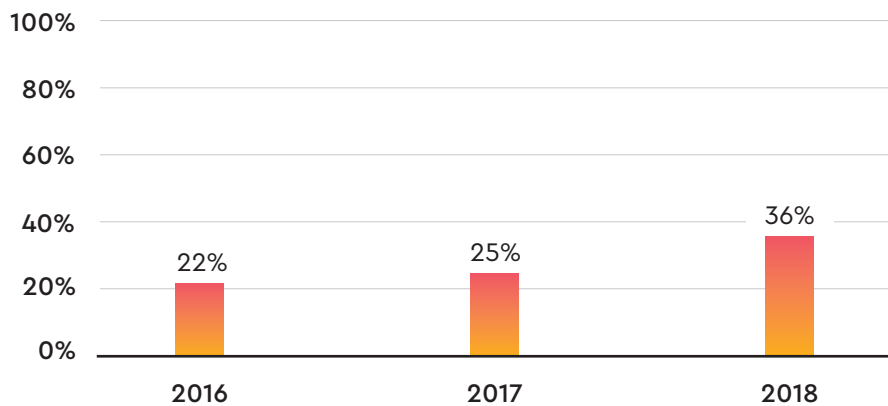
Western Digital values and promotes a "Speak Up" culture in which any person may confidentially, without fear of retaliation, report potentially illegal or unethical situations violating our Code of Ethics, the Global Code of Conduct, policies and procedures or applicable laws. Both employees and those external to Western Digital—including business partners, suppliers and non-employee members of our workforce—have access to report concerns. We routinely remind our workforce about the multiple avenues to report concerns, including a supervisor or manager, the Human Resources Department, the Legal Department, the Ethics and Compliance team or directly to the company's Ethics Helpline.

We promote the Ethics Helpline and our anti-retaliation policy in all company locations. Our Ethics Helpline is available online at [www.ethicshelplinewdc.com](http://www.ethicshelplinewdc.com), or by phone in all countries of operation, in the relevant language for each location. All concerns raised through the Ethics Helpline can be reported anonymously, where legally permitted. A third party administers the Ethics Helpline for intake and transfers concerns to our Global Ethics and Compliance team, where well-trained staff work with appropriate internal (or external) teams to correct situations of misconduct and take action to administer discipline and prevent future occurrence and retaliation.

## Governance Structure

Our strong corporate governance ensures accountability and the highest level of integrity in management practices across the organization. Western Digital's [Board of Directors](#) has standing Audit, Compensation, Governance and Executive Committees. Each of the standing committees operates in accordance with a written charter, available on our website under "Leadership and Governance" at [investor.wdc.com](http://investor.wdc.com). Our Board of Directors and its standing committees are responsible for oversight of the company's strategic planning and risk management and regularly receive updates about the company's overall sustainability initiatives and performance, including annually reviewing and approving our published [supply chain policy](#). Our Audit Committee oversees Western Digital's enterprise risk management process, including the risk assessment and risk management policies.

### WOMEN ON THE BOARD<sup>1</sup>



<sup>1</sup>As of December 31 each year



Our Board of Directors is comprised of a substantial majority of independent directors, including an independent Chairman of the Board and a Lead Independent Director with clearly defined roles and responsibilities. Each director is elected annually by a simple majority of the votes cast by our shareholders. Our Board of Directors is committed to Board refreshment and diversity, has adopted a director retirement policy and conducts annual third-party facilitated Board and committee self-evaluations.

Western Digital focuses on shareholder engagement and feedback through a robust shareholder outreach program led by our Board of Directors. The company also adopted proxy access, which permits an individual or group of stockholders who meet certain requirements to nominate the greater of two director nominees or 20% of directors.

# Anti-Corruption



103-1

## **WHY IT MATTERS**

As a global company operating across a wide range of geographies, Western Digital is exposed to corruption risks. Our policies strictly prohibit all forms of bribery and corruption. We are committed to holding ourselves and our business partners accountable to the anti-corruption laws of the countries where we operate, and the standards set forth in the Responsible Business Alliance (RBA) Code of Conduct, our Code of Business Ethics, and our Global Code of Conduct.

56

103-2

## **Policies and Programs**

We manage corruption risks in Western Digital's operations through numerous programs and initiatives:

- Implementing an Ethics and Compliance pre-approval process for conflicts of interest, charitable contributions, gifts, entertainment, market development funds, travel and other expense items
- Performing risk-based due diligence on our intermediaries, including suppliers and customers, and ongoing due diligence where appropriate
- Providing annual training for employees during our Compliance Awareness Month, and strategic training throughout the year for targeted higher risk groups



- Providing training during supplier events hosted at our sites to communicate our expectation that suppliers understand and follow our policies and know how to report concerns
- Continually monitoring through internal reviews of our processes and audits of our third parties

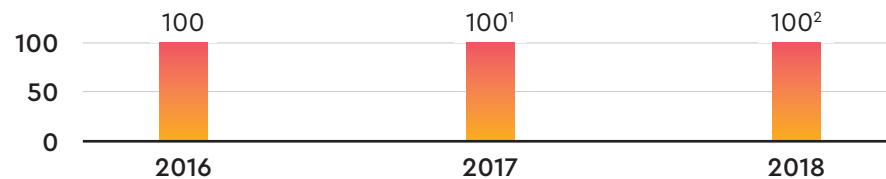
We review our policies annually and share them on our intranet. Our policies include a comprehensive Global Anti-Corruption Policy; a Global Business Courtesies Policy, which outlines gift, entertainment and other courtesies we may provide or receive; and a Charitable Contributions Policy.

## Key Metrics

We regularly complete comprehensive anti-corruption risk assessments of our global operations. In 2016, we conducted a review of 100% of our operations for anti-corruption risks. In 2017, we re-reviewed the company's anti-corruption risks following the acquisition of SanDisk. In 2019, the enterprise compliance risk assessment included anti-corruption in its list of topics for review.

205-1

### PERCENT OF OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION



<sup>1</sup> Post-SanDisk acquisition

<sup>2</sup> 2019 global risk assessment for all risk areas

As a global company with operations throughout the world, our risk assessments will often identify areas for improvement. We perform risk mitigation planning and execution following assessments to ensure our business methodically and appropriately addresses key risks. Our risk assessments take into account where the company does business, our customer types, our internal procedures and current circumstances at the time of the assessment (for example, high pressure, trade tensions, and others). They also include testing multiple variables, controls and triggering events, allowing us to understand where to properly deploy resources most effectively. No major deficiencies were identified in any of these reviews in 2018.

99%

of employees completed  
Global Code of Conduct training  
by month-end deadline

57

100%

of operations assessed  
for risks related to corruption





# Data Privacy and Security



103-1

## WHY IT MATTERS

Western Digital invests in protecting individuals' privacy by securing and respecting personal information that customers and employees share with us. Our customers are comfortable working with us because they trust that their data will be well-protected. We take this responsibility seriously and are committed to following the highest standards of internal data management practices.

103-2

## Responsibility

Our comprehensive approach to data management involves two business functions.

- **Data Security:** Our Operational Risk Advisory Council directs security broadly throughout the organization. Groups that help manage data security risks in the organization include our IP Compliance, Information Security and Physical Security teams. Our Information Security team, responsible for protecting company data, is led by our Vice President, Head of Information Security, who delivers quarterly reports to the Audit Committee of our Board of Directors.



- **Data Privacy:** Our Privacy Steering Committee serves as an advisory committee to our Data Privacy Program, and comprises executive leaders throughout the organization. We have a dedicated team of data privacy experts that manage privacy, including a Data Protection Officer and full-time privacy professionals.

## Policies

We care about the privacy of our customers, employees and business partners. Our robust global Privacy, Data Security and Confidential Information programs—each comprising policies, processes and education—carefully protect data in accordance with the strictest legal standards throughout the world.

## We translate our data privacy and security policies into multiple languages for end users.

As a company with a long history of innovation, we understand the importance of data security, and our policies reflect that. Our Global Confidential Information Policy outlines rules for protecting sensitive information generally, including personal information, while our Acceptable Use Policy governs how our employees may utilize technology and devices attached to our network. Our enterprise Cyber Security Policy provides guidance to employees and IT personnel on protecting our infrastructure from cyber-attacks, including a comprehensive incident response plan should an incident occur.

Our Global Privacy Policy and [Privacy Statement](#) describe the ways in which we collect, use and protect personal information. As a global company, we carefully design these policies to—at a minimum—conform to laws throughout the world, including the requirements of the European Union (EU) General Data Protection Regulation (GDPR), which took full effect in May 2018. The Global Privacy Policy is employee-facing and describes roles, requirements and best practices for handling personal and sensitive information.

We review our data privacy and security policies annually and, in 2018, we updated multiple policies as part of our integration efforts from three legacy companies into one Western Digital and to address new legal requirements. We translate appropriate policies into multiple languages for end users. Beyond the policies and guidelines mentioned above, Western Digital protects sensitive and/or private data through the following:

- Global Code of Conduct
- Patch Management and Malware Prevention Policy
- Privileged Account Management Policy
- Corporate Password Policy and Guidelines
- Guidelines for Handling Confidential Information
- Guidelines for Handling Business Partner Information
- Guidelines for Secure Document Shredding

## Training

Western Digital conducts extensive employee training and communications on privacy and data security to ensure our employees understand how to manage, handle and protect data. We use a combination of all-employee and targeted training for both factory and professional/managerial employees:

### All-Employee Training and Communication

Privacy Policy	Online module training in October 2018
Confidential Information	Online module training in October 2018
2018 Data Privacy Change Management Communication	Enterprise-wide emails and intranet communications including blogs, executive communications, videos, infographics, and digital posters
2018 IP Compliance Awareness Communications	Enterprise-wide emails and intranet communications including blogs, executive communications, infographics, and digital posters
Acceptable Use Policy	Online notice and certification will be required in 2019

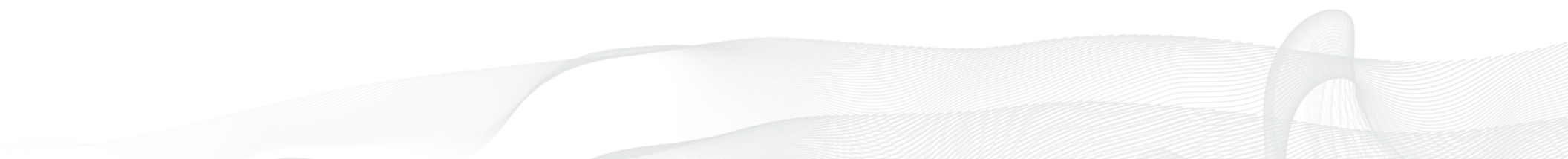
60

### Targeted Training and Communication

Privacy Laws	Targeted training on new privacy laws to over 1,000 employees throughout the world who may handle personal information
Cyber Security	WebEx and in-person training annually
Global Confidential Information Policy	Suite of eight courses given to different parts of the business, as well as individually-tailored courses developed and delivered on-demand

### Other (Testing)

- Tabletop tests of incident response plan
- Penetration tests
- Phishing tests



103-3

Western Digital routinely evaluates our data privacy and security management systems, measuring and testing them on a regular basis. We report to the Audit committee quarterly on our program maturity and risk exposure. For data security, we engage third parties to conduct independent assessments and we report results and findings to the Board annually. For data privacy, we report to the Audit Committee quarterly on our program maturity and risk exposure. The Privacy Steering Committee also receives frequent reports on the evolving landscape of laws, privacy activity and volumes of subject rights requests, privacy agreements and incidents.

418-1

### Key Metrics

We did not have any reportable or significant breaches of personal data during the reporting period.

**In 2018, we had zero reportable or significant breaches of personal data.**



# Architecting Vibrant Communities

We believe that corporate sustainability should go beyond environmental and labor considerations to provide a positive social impact on the local communities in which we operate. This has led us to an impactful giving and volunteerism program around the world, a deep commitment to inspiring and providing opportunities for future talent through STEM education and scholarship programs, and utilizing our technology and expertise to create positive change on a macro scale.

# Corporate Philanthropy



At Western Digital, we care about the needs of the communities where we operate, and we know that we thrive when our communities thrive. Through our Global Giving and Doing initiatives, we aim to make a significant impact in our communities by focusing our efforts in three areas:

- 1. STEM Education:** Our goal is to provide increased access to STEM (Science, Technology, Engineering and Math) education to under-represented and under-privileged youth on a global scale.
- 2. Hunger Relief:** We focus on alleviating the immediate need for food on a local level and supporting organizations that seek to eradicate hunger through strategic initiatives.
- 3. Environmental Preservation:** We aim to preserve and protect the environment in the geographic regions where Western Digital operates through supporting nonprofit (NPO) and nongovernmental (NGO) partners with an environmental focus, including those that provide public education of local and global environmental issues, and supporting relief efforts in times of natural disaster.

Western Digital's executive leadership team sets an annual budget for our Global Giving and Doing business function. Our Global Giving and Doing Advisory Council brings together a cross-section of global leaders who meet regularly to set our giving strategy, including programming, outcomes, direction and employee offerings. Two full-time leaders are responsible for the execution of our giving strategy. They work together with a team of seven employees located in India, Malaysia,

Thailand, Israel and the United States to ensure we put our global vision into practice with considerations to local customs and cultural relevance.

## STEM Education

### Scholarships

In 2018, we launched the Western Digital Scholarship Program to help realize the potential of future scientists, technologists, engineers and mathematicians, as well as the dependents of our talented workforce. This global program offers \$1 million in scholarship opportunities to students seeking to expand their educational aspirations in STEM-related fields.

As part of the company's commitment to support diversity and inclusion in education around the globe, our scholarship program comprises two components:

- Western Digital Scholarships for STEM: Created to address the unmet educational needs of high-potential, underprivileged and underrepresented students around the globe pursuing STEM-related degrees. Available to students pursuing undergraduate STEM education in the United States, Japan, China, India, Malaysia, the Philippines and Thailand.
- We.care Scholarships: We provide financial assistance to support the educational pursuits of high-achieving dependents of our employees. Open to all Western Digital employee dependents across the globe; we award scholarships through a competitive application process.

To learn more, please visit the [Scholarship Programs](#) page on Western Digital's corporate website.





### Mentoring and Skills Building

Western Digital employees serve as mentors to budding STEM stars throughout the world. For example, through partners like [Citizen Schools](#) and [Try Engineering Together](#) in the United States, we work with young students to encourage their love of learning and discovery. In Israel, we partner with [ATIDIM](#) each year to support 20 girls in a year-round scholarship and mentorship program, matching female students with the women of Western Digital in mentorship through their college-level education, fostering personal and professional growth.

### Hunger Relief

Since 2013, Western Digital has partnered with [Rise Against Hunger](#) for an annual Global Hunger Relief campaign. In 2018, we engaged 6,127 Western Digital volunteers at 26 sites around the world to package meals for individuals in need. We are proud to report we exceeded our goal to package two million meals by more than 10%. In keeping with our desire to remain locally relevant, we also partnered with [Latet](#) in Israel to pack 100,000 kosher meals for local families. Over the lifespan of this partnership, meals packed by Western Digital volunteers have provided ongoing nourishment to individuals in 16 different countries around the world.

Beyond the Global Hunger Relief campaign, efforts to help end hunger in our local communities take place year-round. Cash grants, coupled with our localized employee volunteer efforts, ensure our attention to this persistent issue extends beyond a single campaign. In 2018, Western Digital employees in India contributed over 700 volunteer hours to [Akshaya Patra](#) to provide school lunches to end classroom hunger in India. Additionally, employees in Colorado Springs donated 46 turkeys during their "Take a Turkey to Work Day" campaign. Our volunteer efforts resulted in more than \$300,000 in volunteer grants to NPOs and NGOs around the globe who share our vision of a world without hunger.

## Environmental Preservation

Our giving and volunteer programs care for our planet throughout the year and around the globe. Western Digital's annual Earth Day global volunteer campaign has been a cornerstone of our Global Giving and Doing environmental efforts. During the 2018 campaign, more than 1,500 employees from 18 sites volunteered over 5,000 hours of service. While this campaign was global in impact, it had a local focus. Each site had the opportunity to select from a group of nonprofit partners and a volunteer activities where employees believed they could make the most significant impact on their local environment.

In addition to our Earth Day activities, Western Digital employees kayaked, hiked, climbed and jogged to clean parks, beaches, creeks, gardens, mountains and urban areas in 2018. They planted 1,717 trees and participated in wildlife conservation efforts. Overall, Western Digital accomplished

41 environmental preservation volunteer activities in 2018 and provided cash grants to an additional 18 nonprofit organizations across the United States through our [Community Grants Program](#).

## Disaster Relief

In times of natural disaster, we support local organizations providing relief efforts. Corporate gifts and/or matching employee donations provide financial assistance. In 2018, Western Digital matched employee donations 1:1 to provide relief to the communities affected by Typhoon Mangkhut in the Philippines, the Kerala Floods in India and the Camp Fire in California. As part of the Kerala Floods relief efforts, the campaign included an employee volunteer event to pack emergency meals with Rise Against Hunger. In California, Western Digital employees carried out holiday gift drives to support the local families affected by the Camp Fire.

## Key Metrics

- 268 company-sponsored volunteer events, engaging 28 unique Western Digital sites
- 13,400 volunteers provided 71,000 hours
- 222 volunteer grants provided to non-profit and NGO partners as a result of our employee volunteer efforts
- 158 scholarships provided to STEM students and Western Digital dependents who demonstrated financial need; 58% of awards went to females
- 127 cash grants provided to non-profit partners to support their work in STEM education, Hunger Relief or Environmental Preservation

# Appendix

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## Stakeholder Engagement

In 2018, Western Digital engaged a third-party consultant to conduct a materiality assessment to help us identify, assess and prioritize the environmental, social and governance (ESG) topics most significant to our company and stakeholders. Through this process, we sought to understand the company's greatest ESG impacts, opportunities and risks—and to identify the largest influencers of stakeholders' decision-making. The assessment was informed by GRI's guidelines of Identification, Prioritization and Validation and employed the GRI Stakeholder Inclusiveness and Materiality Principles.

With stakeholder input, the topics and descriptions evolved during the materiality assessment; this provided a topic list most significant and relevant for our company to manage. We also determined the boundary of our sustainability impacts, and potential risks and opportunities. Through the process outlined above, we applied the Materiality Principle to the identified topics.

## 1. Identification

To identify the universe of potentially relevant ESG topics, Western Digital referred to numerous internal and external sources:

- Western Digital internal documents and public reports
- Industry association reports
- Customer and peer sustainability reports
- Investor frameworks and ESG ratings and rankings reports
- NGO and media reports

To ensure the identified topics were relevant to Western Digital, we conducted a Value Chain Impact Mapping Session with 26 representatives of different Western Digital business lines and functions; this exercise also helped map the boundary of different ESG impacts. This process led to the initial list of topics used in the Prioritization phase.

## 2. Prioritization

To prioritize which topics matter most to Western Digital and our key stakeholders, we sought input in various ways:

- In-person and telephone interviews with 18 internal corporate leaders and 10 individuals from 6 external organizations to gather evidence of Western Digital's impacts, risks and opportunities
- Evaluation of 28 third-party and internal sources to supplement stakeholder perspectives gathered through Impact Mapping and interviews



Western Digital ascribed weightings to each stakeholder group based on the:

- Relative influence on Western Digital's performance
- Number of stakeholder interviews/sources evaluated per group
- Depth and quality of information gathered

### 3. Validation

To confirm that the materiality findings were valid, Western Digital sought feedback on the process and results with a group of cross-functional internal leaders. The methodology and materiality matrix were then shared with and approved by Western Digital's executive leadership team.



## Material Topics and Boundaries

While all ESG topics are important to our company and warrant effective management, stakeholders desired additional communication on several topics. These topics, shown below, are the focus for this report.

	TOPIC	DESCRIPTION	BOUNDARY (WHERE THE IMPACTS OCCUR)
Sustainable Products	Lifecycle Impacts	Minimizing environmental impacts that may occur throughout the lifecycle of Western Digital products	Western Digital: All Operations External: Suppliers, Contract Manufacturers, Customers, Communities
	Chemicals & Hazardous Substances	Reducing and managing the use of controversial or harmful chemicals in Western Digital's products and manufacturing operations	Western Digital: All Manufacturing Operations External: Suppliers, Contract Manufacturers, Customers, Consumers
Environment	Energy & Emissions	Reducing energy use and increasing energy efficiency and renewable energy use; and reducing greenhouse gas emissions, toxic air emissions and fine particulate matter generated	Western Digital: All Operations External: Suppliers, Contract Manufacturers
Responsible Supply Chain	Critical Minerals & Metals	Adhering to the responsible management and transparency regarding the origin of conflict minerals (3TG minerals) in Western Digital's supply chain, and mitigating risks of other raw materials that are both essential in use and subject to the risk of supply restriction.	Western Digital: Supply Chain Management/Procurement External: Suppliers, Contract Manufacturers, Communities
	Human Rights & Labor Practices	Safeguarding the human rights of all people affected by Western Digital's activities and the manufacturing of Western Digital's products; prohibiting child labor and forced labor while protecting proper working conditions throughout Western Digital's supply chain, including the right to freedom of association	Western Digital: Supply Chain Management/Procurement, All Manufacturing Operations External: Suppliers, Contract Manufacturers, Customers, Consumers, Communities



	TOPIC	DESCRIPTION	BOUNDARY (WHERE THE IMPACTS OCCUR)
Stronger Workforce	Health & Safety	Creating a culture that supports practicing best-in-class health and safety workplace standards and processes, including safety education, safe working conditions, employee well-being and health resources	Western Digital: Employees External: Suppliers, Contract Manufacturers
	Talent Attraction, Engagement & Retention	Attracting and retaining talent through an ethical culture, competitive wages and benefits, and meaningful work standards/policies; creating an environment where employees feel an emotional connection to Western Digital, which translates to increased involvement, effort and productivity	Western Digital: Employees, Potential Employees External: Suppliers, Contract Manufacturers, Customers
	Diversity & Inclusion	Promoting diversity (racial, ethnic, gender, age, etc.) in Western Digital's workplace and Board of Directors; ensuring an equal opportunity hiring process, and fostering an inclusive work environment for all employees	
Economic/Governance	Anti-corruption	Preventing corruption and bribery throughout Western Digital's supply chain	Western Digital: All Operations External: Suppliers, Contract Manufacturers, Customers
	Data Privacy & Security	Ensuring the privacy and security of data held by Western Digital and protecting such data from potential negative incidents	Western Digital: All Operations, Employees External: Customers, Communities, Consumers
Vibrant Communities	Global Giving & Doing	Proactively engaging with local communities in areas where Western Digital operates through financial contributions, strategic product donations, and employee volunteerism	Western Digital: All Operations External: Communities

# GRI Content Index

## General Disclosures

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Organizational Profile</b>			
102-1	Name of the organization	Western Digital	
102-2	Activities, brands, products, and services	<a href="#">Who We Are</a>	
102-3	Location of headquarters	San Jose, California	
102-4	Location of operations	<a href="#">2018 Annual Report Form 10-K, p. 35</a>	
102-5	Ownership and legal form	Publicly traded company under NASDAQ: WDC	
102-6	Markets Served	<a href="#">Who We Are</a>	
102-7	Scale of the organization	<a href="#">Who We Are; Diversity &amp; Inclusion; 2018 Annual Report Form 10-K p. 4, p. 40</a>	
102-8	Information on employees and other workers	<a href="#">Diversity and Inclusion</a>	
102-9	Supply chain	<a href="#">Architecting a Responsible Supply Chain</a>	
102-10	Significant changes to the organization and its supply chain	Not Applicable	
102-11	Precautionary Principle or approach	Western Digital does not address the precautionary principle.	
102-12	External initiatives	<a href="#">Making a Difference on a Global Scale</a>	
102-13	Membership of associations	The Responsible Business Alliance	
<b>Strategy</b>			
102-14	Statement from senior decision-maker	<a href="#">CEO Letter</a>	
<b>Ethics and Integrity</b>			
102-16	Values, principles, standards, and norms of behavior	<a href="#">Ethics and Integrity</a>	

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
102-17	Mechanisms for advice and concerns about ethics	<a href="#">Ethics and Integrity</a>	
<b>Governance</b>			
102-18	Governance structure	<a href="#">Ethics and Integrity</a>	
<b>Stakeholder Engagement</b>			
102-40	List of stakeholder groups	<a href="#">Stakeholder Engagement</a>	
102-41	Percentage of total employees covered by collective bargaining agreements	<a href="#">2018 Annual Report Form 10-K, p. 11</a>	
102-42	Identifying and selecting stakeholders	<a href="#">Stakeholder Engagement</a>	
102-43	Approach to stakeholder engagement	<a href="#">Stakeholder Engagement</a>	
102-44	Key topics and concerns raised	<a href="#">Stakeholder Engagement</a>	
<b>Reporting Practices</b>			
102-45	Entities included in the consolidated financial statements	<a href="#">2018 Annual Report Form 10-K, pp. 152-154</a>	
102-46	Defining report content and topic Boundaries	<a href="#">Stakeholder Engagement</a>	
102-47	List of material topics	<a href="#">Stakeholder Engagement</a>	
102-48	Restatements of information	Not Applicable	
102-49	Changes in reporting	Not Applicable	
102-50	Reporting period	Calendar Year 2018	
102-51	Date of most recent report	Not Applicable	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions about the report	<a href="mailto:sustainability@wdc.com">sustainability@wdc.com</a>	
102-54	Claims or reporting in accordance with GRI Standards	<a href="#">About This Report</a>	
102-55	GRI content index	This document represents the Company's content index	
102-56	External Assurance	<a href="#">Energy and Emissions;</a> <a href="#">External Verification Report</a>	

## Economic

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Anti-Corruption</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Anti-Corruption; Material Topics and Boundaries	
	103-2 The management approach and its components	Anti-Corruption	
	103-3 Evaluation of the management approach	Anti-Corruption	
205-1	Operations assessed for risks related to corruption	Anti-Corruption; ESG Data Download	

## Environmental

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Energy</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Energy and Emissions; Material Topics and Boundaries	
	103-2 The management approach and its components	Energy and Emissions	
	103-3 Evaluation of the management approach	Energy and Emissions	
302-1	Energy consumption within the organization	Energy and Emissions Key Metrics; ESG Data Download	
302-3	Energy intensity	Energy and Emissions Key Metrics; ESG Data Download	
302-5	Reductions in energy requirements of products and services	Lifecycle Impacts Key Metrics; ESG Data Download	



GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Water</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Not Applicable	Water was not identified as a material topic for Western Digital
	103-2 The management approach and its components	Not Applicable	Water was not identified as a material topic for Western Digital
	103-3 Evaluation of the management approach	Not Applicable	Water was not identified as a material topic for Western Digital
303-1	Water withdrawal by source	<a href="#">ESG Data Download</a>	
303-3	Water recycled and reused	<a href="#">ESG Data Download</a>	
<b>Emissions</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	<a href="#">Energy and Emissions; Material Topics and Boundaries</a>	
	103-2 The management approach and its components	<a href="#">Energy and Emissions</a>	
	103-3 Evaluation of the management approach	<a href="#">Energy and Emissions</a>	
1.2	Whether offsets were used	No offsets were used	
305-1	Direct (Scope 1) GHG emissions	<a href="#">Energy and Emissions Key Metrics; ESG Data Download</a>	
305-2	Energy indirect (Scope 2) GHG emissions	<a href="#">Energy and Emissions Key Metrics; ESG Data Download</a>	
305-3	Other indirect (Scope 3) GHG emissions	<a href="#">ESG Data Download</a>	
305-4	GHG emissions intensity	<a href="#">Energy and Emissions Key Metrics; ESG Data Download</a>	

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Environmental Compliance</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Not Applicable	Environmental Compliance was not identified as a material topic for Western Digital
	103-2 The management approach and its components	Not Applicable	Environmental Compliance was not identified as a material topic for Western Digital
	103-3 Evaluation of the management approach	Not Applicable	Environmental Compliance was not identified as a material topic for Western Digital
307-1	Non-compliance with environmental laws and regulations	<a href="#">Chemicals and Hazardous Substances Key Metrics</a>	
<b>Supplier Environmental Assessment</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Not Applicable	Supplier Environmental Assessment was not identified as a material topic for Western Digital
	103-2 The management approach and its components	Not Applicable	Supplier Environmental Assessment was not identified as a material topic for Western Digital
	103-3 Evaluation of the management approach	Not Applicable	Supplier Environmental Assessment was not identified as a material topic for Western Digital

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
308-2	Negative environmental impacts in the supply chain and actions taken	Number of suppliers assessed for environmental impacts 2017: 30; 2018: 65 Number of suppliers identified as having significant actual and potential negative environmental impacts 2017: 0; 2018: 0	<p>Unavailable Information:</p> <ul style="list-style-type: none"> <li>◦ Percentage of suppliers identified as having significant actual and potential negative environmental impacts and improvements were agreed upon as a result of assessment</li> <li>◦ Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment</li> </ul> <p>Only data collection has occurred. No assessment or outreach has been conducted yet.</p>

## Social

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Employment</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Talent Attraction, Engagement, and Retention; Material Topics and Boundaries	
	103-2 The management approach and its components	Talent Attraction, Engagement, and Retention	
	103-3 Evaluation of the management approach	Talent Attraction, Engagement, and Retention	
401-1	New employee hires and employee turnover	Talent Attraction, Engagement, and Retention Key Metrics; ESG Data Download	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Talent Attraction, Engagement, and Retention	
<b>Training and Education</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Not Applicable	Training and Education was not identified as a material topic for Western Digital
	103-2 The management approach and its components	Not Applicable	Training and Education was not identified as a material topic for Western Digital
	103-3 Evaluation of the management approach	Not Applicable	Training and Education was not identified as a material topic for Western Digital
404-2	Programs for upgrading employee skills and transition assistance programs	Talent Attraction, Engagement, and Retention	
404-3	Percentage of employees receiving regular performance and career development reviews	Talent Attraction, Engagement, and Retention	

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Occupational Health and Safety</b>			
103: Management Approach 2018	103-1 Explanation of the material topic and its Boundaries	Health and Safety; Material Topics and Boundaries	
	103-2 The management approach and its components	Health and Safety	
	103-3 Evaluation of the management approach	Health and Safety	
	403-1 Occupational health and safety management system	Health and Safety	
	403-2 Hazard identification, risk assessment, and incident investigation	Health and Safety	
	403-3 Occupational health services	Health and Safety	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health and Safety	
	403-5 Worker training on occupational health and safety	Health and Safety	
	403-6 Promotion of worker health	Health and Safety	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health and Safety	
403-8	403-8 Workers covered by an occupational health and safety management system	Health and Safety Key Metrics; ESG Data Download	
403-9	403-9 Work-related injuries	Health and Safety Key Metrics; ESG Data Download	
<b>Diversity and Equal Opportunity</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Diversity and Inclusion; Material Topics and Boundaries	
	103-2 The management approach and its components	Diversity and Inclusion	
	103-3 Evaluation of the management approach	Diversity and Inclusion	



GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
405-1	Diversity of governance bodies and employees	Diversity and Inclusion Key Metrics; ESG Data Download	
<b>Child Labor</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Human Rights and Labor Practices; Material Topics and Boundaries	
	103-2 The management approach and its components	Human Rights and Labor Practices	
	103-3 Evaluation of the management approach	Human Rights and Labor Practices	
408-1	Operations and suppliers at significant risk for incidents of child labor	Human Rights and Labor Practices	
<b>Forced or Compulsory Labor</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Human Rights and Labor Practices; Material Topics and Boundaries	
	103-2 The management approach and its components	Human Rights and Labor Practices	
	103-3 Evaluation of the management approach	Human Rights and Labor Practices	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Human Rights and Labor Practices	
<b>Human Rights Assessment</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Human Rights and Labor Practices; Material Topics and Boundaries	
	103-2 The management approach and its components	Human Rights and Labor Practices	
	103-3 Evaluation of the management approach	Human Rights and Labor Practices	
412-1	Operations subject to human rights reviews or human rights impact assessments	Human Rights and Labor Practices We conduct RBA VAP audits biennially at our finished good sites in China, Malaysia and Thailand. Though we work to ensure all operations are free from potential risks, risk is highest in China and Malaysia.	

GRI STANDARD	DISCLOSURE DESCRIPTION	REPORT LOCATION OR DIRECT ANSWER	OMISSIONS
<b>Supplier Social Assessment</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Not Applicable	Supplier Social Assessment was not identified as a material topic for Western Digital
	103-2 The management approach and its components	Not Applicable	Supplier Social Assessment was not identified as a material topic for Western Digital
	103-3 Evaluation of the management approach	Not Applicable	Supplier Social Assessment was not identified as a material topic for Western Digital
414-2	Negative social impacts in the supply chain and actions taken	<a href="#">Critical Minerals and Metals; Human Rights and Labor Practices</a> We use lessons learned from our biennial RBA audits to improve each of our factories, which are all held to the same high standard. We are now preparing to launch similar audits at our component manufacturing sites in China, Malaysia, Thailand, and the Philippines.	
<b>Customer Privacy</b>			
103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	<a href="#">Data Security and Privacy; Material Topics and Boundaries</a>	
	103-2 The management approach and its components	<a href="#">Data Security and Privacy</a>	
	103-3 Evaluation of the management approach	<a href="#">Data Security and Privacy</a>	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<a href="#">Data Security and Privacy Key Metrics</a>	
<b>Other Disclosures</b>			
SASB TC-HW-430a.1 & TC-HW-430a.2	Suppliers Assessed Using RBA Validated Assessment Program (VAP)	<a href="#">Human Rights and Labor Practices Key Metrics; ESG Data Download</a>	



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Western Digital® architecting how data enables the world to solve its biggest challenges. New devices, new systems, new solutions, all optimized and tuned to create the right conditions for data to realize its full potential. As a leader in data infrastructure, we accept the responsibility to empower people and systems that depend on data. Western Digital's data-centric solutions are comprised of the Western Digital, G-Technology™, SanDisk®, and WD® brands.

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