



Western Digital®

DATA AT EVERY STEP, EVERYWHERE

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# SUSTAINABILITY REPORT 2020

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"At Western Digital, protecting our planet means analyzing how our business and products impact the environment, improving the footprint we create, transparently sharing the practices we follow and respecting the diversity of all people."



## A Message From Our CEO

### 102-14

Success depends on a strong commitment to conducting business ethically, responsibly and with careful measures to ensure our environment, people and communities continue to thrive.

At Western Digital, protecting our planet means analyzing how our business and products impact the environment, improving the footprint we create, transparently sharing the practices we follow and respecting the diversity of all people.

The way we see it, degrading our environment is not an option. We operate large manufacturing facilities around the world and are focused on implementing requirements that not only meet guidelines but proactively reach beyond them. For example, through innovation we reduced energy consumption in our manufacturing processes and were able to improve energy intensity more than 40 percent\* since 2016.

We care deeply about the well-being of people and communities. The health, safety and belongingness of our employees is our top priority. In light of the recent events addressed later in this report, we reiterate our commitment to creating a diverse and inclusive environment where every person can

experience a strong sense of respect and contribution. There is a lot of work that must be done in this area and real progress is a team effort. We are engaging our leaders and people managers from across the company and are developing a broad range of new programs that will help us deliver on our commitment.

While this year's report highlights many of our successes, we believe we can do more and have expanded our sustainability vision for what the company can accomplish in the coming years. We are increasing our engagement with our stakeholders, taking a data-driven approach to identifying sustainability-related risks and opportunities, and proactively partnering with employees, peers, suppliers and customers to raise expectations. As a global data storage leader, we think we can and should help others leverage the power of their data and tackle the world's most pressing sustainability challenges.

Thank you for your interest in Western Digital's 2020 Sustainability Report. As you'll see, we are determined to help build a better future.

A handwritten signature in black ink, appearing to read "D. Goeckeler". The signature is fluid and cursive.

David Goeckeler, CEO

\* Measured in kilowatt-hours per petabyte (kWh/PB)



## A NOTE TO OUR READERS

While the following report looks back on our sustainability initiatives during calendar year 2019, we'd like to publicly and compassionately acknowledge the extraordinary circumstances we now are facing together as a community.

People, governments and businesses throughout the world continue to struggle with devastating challenges stemming from COVID-19. This crisis has significantly changed many of the ways we live, work and experience our daily lives. As a company that designs and builds some of the world's most critical IT infrastructure technology, we have worked tirelessly to stay operational so that we can continue providing the digital storage products that are essential in supporting functions crucial in this pandemic such as e-commerce, e-learning, online healthcare and research. We take seriously the fact that people all over the world rely on us and we remain committed to doing everything we can to make our products available to them. To deliver on this commitment, we have prioritized the health and safety of our employees, enabling them to work from home whenever possible, providing emergency leave to support those who cannot work, and adopting leading safety measures at our facilities around the world for our teams with responsibilities that require them to be onsite.

We are also saddened by the continued reality of persistent, institutional racism plaguing our communities in the United States. Too often people of color have been denied—and continue to be denied—rights and opportunities solely because of their race. We are convicted in our stand that racism is wrong and must end. Western Digital has worked to create a diverse, equitable and inclusive environment where all of our employees can thrive, but we know there is much more we can do. We want to help address systemic areas of ingrained bias and broaden educational and advancement opportunities for all, especially for our communities of color and underserved communities. We stand united with those working to bring greater freedom, equality and justice to this country and throughout the world.

# OUR BUSINESS

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Western Digital is a company of problem-solvers. We are inspired knowing our technology ensures the world has data at every step, everywhere.

Western Digital.  
GREAT OAKS CAMPUS

GATE

1

5601  
Great Oaks  
Parkway

FIVE LANE - NO PARKING

# Who We Are

## 102-2

For more than 50 years, Western Digital's products have broken barriers, enabled digital "firsts" and allowed people to create memories and share knowledge like never before. We are proud to see people using technology and data to solve the world's biggest challenges, and achieving success through our innovation.

We know the conversation around the inherent value of data is shifting; it's no longer a business by-product, it's an essential and valuable asset. Big data and fast data in the core and at the edge now exceed the capabilities of traditional infrastructures, especially around scalability, performance and efficiency. Western Digital is enabling businesses to evolve their data infrastructure by engineering solutions that address the ever-increasing demands of data at scale. Some of the most game-changing companies, leading researchers and tech-centric consumers depend on us, and we are humbled and amazed at what they do.

## 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

## A Portfolio of Consumer and Business Brands

Western Digital offers an expansive technology and product portfolio spanning platforms and devices for data centers. With purpose-built solutions for every type and use of data, the company's portfolio includes hard disk drives (HDDs), NAND Flash, solid-state drives (SSDs) and storage platforms, in addition to consumer products for professional, personal and shared storage use. Our offerings are marketed under the Western Digital®, SanDisk®, WD® and G-Technology™ brands.

Western Digital operates in more than 30 countries, with over a dozen manufacturing and 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. 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 most significant sustainability challenges on a global scale.

Western Digital is building the foundation for data at every step, giving people new ways of using data like never before. Everywhere.



## BUILDING A BRIGHT FUTURE

At Western Digital, 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 building the foundation for data at every step, everywhere. We know that operating sustainably not only protects our people and our planet, but creates value and opportunities for our company in the long-run.

We cultivate an inclusive work environment where every individual can thrive through a sense of belonging, respect and contribution. Giving back and responding to the needs of our communities is also a top priority. We believe that more can be achieved by empowering our employees to make an impact, together.

To take advantage of the 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. Our award-winning [datamakespossible.com](https://datamakespossible.com) website brings together perspectives from government, business and academic leaders to showcase what data enables, spanning topics such as artificial intelligence (AI), data science, autonomous vehicles, climate action, "data for good," data privacy, precision medicine and more. Contributions to the platform, which has received over 2.3 million visits, have included stories from many thought leaders and forward-thinking companies.

We cultivate an inclusive work environment where every individual can thrive through a sense of belonging, respect and contribution.

## ABOUT THIS REPORT

102-50, 102-54

We are proud to share Western Digital's 2020 Sustainability Report covering the calendar year 2019, which has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. The report also references the Sustainability Accounting Standards Board (SASB) Hardware Sustainability Accounting Standard 2018.

Western Digital's 2020 Sustainability Report builds on the work completed since our last report, and further reinforces our commitment to sustainability as an industry leader and global corporate citizen. While this report provides transparency to our stakeholders on our sustainability progress, it also reflects our ongoing efforts to assess the company's greatest environmental, social and governance (ESG) impacts, risks and opportunities to further enhance our practices in the future.





# Governance

While delivering business results is always a driving focus at Western Digital, we believe how we achieve results is equally important. Western Digital is committed to ethical conduct in our business at every step, everywhere.

### 102-18

Western Digital's strong corporate governance demonstrates accountability and a high level of integrity in management practices across the organization. Our [Board of Directors](#) has standing Audit, Compensation and Talent, Governance, and Executive committees; each committee operates in accordance with a written [charter](#). Our Board 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.

The Governance Committee oversees our corporate sustainability policies and program, while the Compensation and Talent Committee reviews our human capital management policies, programs and initiatives covering company culture, talent development, employee retention, and diversity and inclusion. Additionally, our Audit Committee oversees Western Digital's enterprise risk management process, including assessments and policies.

Our executive leadership team sets and oversees our global sustainability strategy, with our Corporate Sustainability function directing the implementation of that strategy, including public reporting. A cross-functional Sustainability Working Group drives specific sustainability initiatives throughout the company and includes representatives from Corporate Sustainability, Human Resources, Supply Chain Management, Quality, Sales and Marketing, Operations, and Ethics and Compliance.

Five of the eight members joined Western Digital's Board of Directors within the past three years.

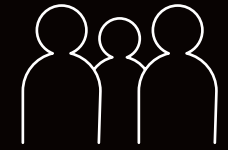
Our Board comprises a majority of independent directors, including an independent Chair of the Board and a Lead Independent Director. Each director is elected annually by a simple majority of shareholder votes. As the strategic direction of Western Digital evolves, we remain committed to ongoing Board refreshment, diversity, and regular third-party facilitated Board and committee self-evaluations. For more information, please refer to our [2019 Proxy Statement](#) and [Corporate Governance Guidelines](#).



The Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices, recognized Western Digital for the second consecutive year as one of the World's Most Ethical Companies.



87.5%



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of our Board of Directors are external and independent\*

50%



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of Board members are women\*

\*Data current as of publication date

# ENVIRONMENT

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We care for our environment at every step, everywhere we operate. We aim to do our part in helping build an environmentally sustainable future by reducing our energy consumption, investing in conservation projects and setting environmental targets.

We're also committed to delivering products designed and manufactured with environmental protection in mind. Because our products are used widely throughout the world, the improvements we make in energy efficiency, recyclability, responsible resource use and chemicals management have an important impact in preserving global natural resources and ecosystems. That is what our customers expect of us, and what we expect of ourselves.



# Energy and Emissions

## WHY IT MATTERS

103-1

As the technology industry grows, the industry's energy consumption and greenhouse gas (GHG) emissions scale up as well. Western Digital is working hard to reduce our operational energy consumption and GHG emissions to minimize our effect on global climate change.

## MANAGEMENT APPROACH

103-2

Our global Real Estate Operations (REO) organization is responsible for our Energy and Resource Management (ERM) and environmental programs. Western Digital's Global ERM Program Management Office (PMO) analyzes macro-level energy and emissions targets on an annual basis to set our corporate-level reduction target and strategy. Each of our operational sites uses this target to set local energy and emissions reduction targets, and provides status reports to the Global ERM PMO and corporate management team semi-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.

44%



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decrease in energy intensity  
since 2016

>1.5%



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On track to achieve >1.5%  
annual energy reduction target  
set for fiscal year 2020



## Energy Resource Management Program

We reduce the amount of energy and carbon in our operations through various ERM Program initiatives. Since 2007, we have saved \$39 million in energy costs by reducing our energy consumption while collecting critically important 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. For example, we increase reliance on high-efficiency machines and further promote energy efficiency through cost-neutral, procedural or behavioral changes. Additionally, we are commissioning a renewable energy survey at our California and Asia-Pacific locations to gather data that will help inform future decisions.

In 2019, Western Digital implemented several energy efficiency measures, while simultaneously increasing our throughput and enhancing our quality.

- At our Great Oaks campus in San Jose, California, we reduced energy use at various laboratories by improving the heating, ventilation, and air conditioning (HVAC) system. Engineering personnel identified an opportunity to place several of the HVAC units on a building control system, allowing for effective control of air flow, especially during non-peak operating hours. This project delivered savings of nearly 2 million kilowatt hours (kWh) during 2019. Simultaneously, the project enabled improved air flow for laboratory and facility engineering staff. The project also resulted in an incentive from the local utility company covering over 50% of the total project cost.

## Integrated Management System

Western Digital uses an Integrated Management System (IMS) to manage corporate quality, environmental, health and safety, and business continuity standards. Our IMS continually evolves, helping us more effectively measure and disclose our commitment to protecting the environment, our people and our business sustainability.

Our IMS Policy includes our commitment to protect the environment. The IMS Policy is underpinned by industry-recognized environmental certifications for all sites, including International Organization for Standardization (ISO) 14001. Visit our [Sustainability Certifications webpage](#) for more information on certifications earned through the IMS.

## Targets and Goals

In 2019, we set an aggressive FY2020 target for energy conservation measures corresponding to >1.5% energy reduction of energy use throughout FY2019. We were more than halfway to achieving our target by the end of calendar year 2019, and our Global ERM team is working to achieve additional savings by the end of FY2020.

Additionally, we completed an initial assessment of our Scope 3 emissions and are working in 2020 on a more detailed Scope 3 assessment to support strategic long-term targets. See the [ESG Data Download](#) for additional information on Scope 3 (product) GHG emissions.

- Our Prachinburi, Thailand, team identified an opportunity to save energy by improving existing HVAC systems and processes. They discovered that chiller performance declined over time due to reduced heat transfer caused by refrigerant deposits on the chiller tube surfaces. This caused an increase in energy demand over time to operate the chillers. After a thorough investigation of options, the team introduced some additive oil into the refrigerant in the systems. The chemical properties of the oil almost completely prevented refrigerant deposits on the chiller tube surfaces. This simple and cost-effective solution improved the chiller performance and chilled water flow rate, resulting in significant energy savings.
- Western Digital is also pursuing energy reduction through the use of AI. Our Milpitas, California, campus installed an Application Program Interface (API) to operate our building more efficiently and effectively. The API uses AI to integrate automation and optimization into our HVAC system by maximizing system performance. By using AI and proprietary relational-based algorithms, the API can monitor real-time inputs and power consumption to advise our building management system on how to optimize our systems. This has allowed us to dynamically adapt our system equipment in real time to maintain peak efficiency.



## HIGHLIGHT STORY

# Energy Savings in Manufacturing: Bang Pa-In, Thailand Facility

As a manufacturer of data storage products, increasing efficiency in the energy-intensive manufacturing process is critical for Western Digital. Our Bang Pa-In campus established an internal ERM team across departments to identify and implement energy saving measures related to hard drive test equipment. The team conducted a study to identify energy saving opportunities to optimize tester operation in alignment with changes in production volume.

They reviewed tester capacity and operational requirements, and identified flexibility in turning off machines. Additionally, the team promoted energy savings by optimizing chiller system operations. This cross-department effort achieved approximately 7,900 megawatt hours in energy savings, corresponding to about 2% of the site's annual electricity consumption.



## HIGHLIGHT STORY

# Data Center Consolidation

Throughout 2019, Western Digital's Information Technology (IT) Project Management service team and numerous IT technical teams and business application owners worked together to consolidate multiple data centers and improve overall energy efficiency. We accomplished this through several actions:

- Enhanced security and increased uptime by moving production workloads to a Tier V Gold certified data center
- Gained operational efficiencies from a reduced physical footprint and consolidated workloads, such as reduced power and cooling
- Reduced IT footprint from storage consolidation, physical server virtualization and decommissioning of unused servers and devices

By consolidating our data center operations, Western Digital will achieve a significant reduction in energy usage and associated environmental impact.

## Internal Audits

### 103-3

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

## Climate Resiliency

At Western Digital, we actively monitor and manage our impact on the environment, as well as the environment's potential impact on our business. Our executive leadership team reviews and evaluates our enterprise risks each year in conjunction with our Enterprise Risk Management Program. Several risks—including climate-related risks—remain key potential risks to regularly assess.

Risks identified during this process are assigned to functional or regional leaders for management and/or mitigation, depending on the characteristics of the risk. Where appropriate, our business continuity team develops a strategy and process to manage the risk across our various sites.

The Audit Committee of our Board of Directors reviews the risks identified through the enterprise risk management process, along with our strategy for managing those risks, at least annually, with additional updates provided as needed based on changes in our risk profile.

Since 2007, we have saved \$39 million in energy costs by reducing our energy consumption while collecting critically important information and data.



## KEY METRICS

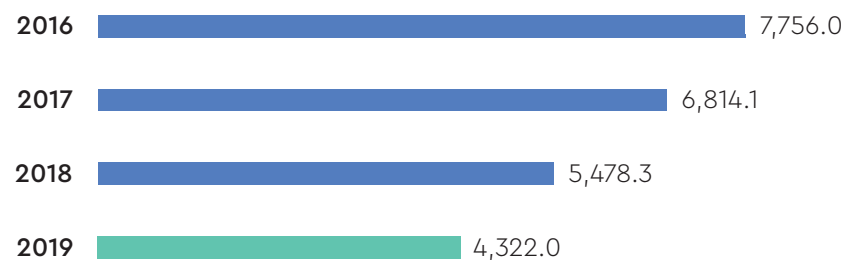
### 102-56

We are proud of our efforts to minimize operational energy use and the resulting emissions. Our GHG emissions inventory is externally verified by Cameron Cole, LLC for the calendar year 2019. For the full verification report, please see the [certifications page](#) on our corporate website.

We also communicate our efforts with external stakeholders through our annual report to [CDP's](#) climate change questionnaire.

### 302-3

Energy Intensity (kWh/PB)<sup>1</sup>



<sup>1</sup>The energy intensity ratio is based on energy consumed within the organization, and is measured in kilowatt-hours per petabyte. Types of energy included are fuel and electricity. The denominator is shipped storage capacity.

### 302-1

Energy Consumption Within the Organization<sup>1</sup>

	2016	2017	2018	2019	2016	2017	2018	2019
	Gigawatt Hours				Trillion Joules			
Total fuel consumption from nonrenewable sources (gas/oil)	206.9	342.1	185.2	173.7	744.7	1,231.6	666.6	625.2
Total fuel consumption from renewable sources	0	0	0	0	0	0	0	0
Electricity consumption	2,011.8	1,988.4	2,030.2	1,893.2	7,242.6	7,158.1	7,308.7	6,815.0
Electricity consumption from renewable sources	N/A	N/A	80.1	448.3	N/A	N/A	288.4	1,613.7
Electricity consumption from nonrenewable sources	N/A	N/A	1,950.1	1,444.8	N/A	N/A	7,020.3	5,200.8
<b>Total Energy Consumption</b>	<b>2,218.7</b>	<b>2,330.5</b>	<b>2,215.4</b>	<b>2,066.9</b>	<b>7,987.3</b>	<b>8,389.7</b>	<b>7,975.3</b>	<b>7,440.7</b>

<sup>1</sup>Data includes the main research, development and manufacturing facilities owned by Western Digital Corporation in calendar year 2019. These 20 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 2018. Western Digital continues to use the GHG Protocol, the most widely used international accounting tool for government and business leaders to understand, quantify and manage GHG emissions.

## 305-1

Total Direct (Scope 1) GHG Emissions (CO<sub>2</sub>e-Ton)

	2016	2017	2018	2019	Conversion Factor
CO <sub>2</sub> (gas/oil + cleaning)	42,849.9	40,526.0	40,298.2	36,230.64	1
CH <sub>4</sub>	0	0	0	0	N/A
N <sub>2</sub> O	0	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> )	48.02	HFC-23: 3,348 (lbs/lbs) HFC-134a: 1,300 (lbs/lbs)
PFCs	0	0	0	0	N/A
SF <sub>6</sub> <sup>2</sup>	5,700.3	2,105.0	1,414.2	6,770.91	Multiple Factors: 23,500 (lbs/lbs) 10,575 (lbs/lbs) 9,623 (lbs/lbs)
NF <sub>3</sub> <sup>3</sup>	34.5	3.0	8.8	2.56	2,898 (lbs/lbs)
CF <sub>4</sub> <sup>2</sup>	1,006.6	676.5	995.5	625.17	Multiple Factors: 6,630 (lbs/lbs) 4,774 (lbs/lbs) 4,344 (lbs/lbs)
C <sub>4</sub> F <sub>8</sub> <sup>3</sup>	14.5	5.0	23.3	0.55	6,010 (lbs/lbs)
HFE7100 <sup>4</sup>	3,691.5	3,805.8	2,748.7	6,221.71	421.0 (lbs/lbs)
HCFC-22 <sup>4</sup>	643.6	837.8	586.3	403.46	1,760 (lbs/lbs)
R-404A <sup>5</sup>	26.1	16.3	26.1	17.74	3,943 (lbs/lbs)
HCFC-123 <sup>4</sup>	30.0	30.0	14.2	14.22	79 (lbs/lbs)
HFE7200 <sup>4</sup>	0	0	0	12.83	57 (lbs/lbs)
R-407C <sup>6</sup>	0	0	0	43.10	1,624 (lbs/lbs)
R-508B <sup>7</sup>	0	0	0	29.02	11,607 (lbs/lbs)
<b>Total Scope 1</b>	<b>56,189.6</b>	<b>50,190.2</b>	<b>46,269.3</b>	<b>50,419.91</b>	

<sup>1</sup>Conversion Factor for HFC-23 is calculated by Western Digital: Conversion factor is determined by facility based on the international technical review of abatement process in manufacturing. Conversion Factor for HFC-134a is based on IPCC fifth assessment report, 100 year number.

<sup>2</sup>Some facilities use IPCC fifth assessment report, 100 year number, and others use other conversion factors determined by facility based on the international technical review of abatement process in manufacturing.

<sup>3</sup>Calculated by Western Digital: Conversion factor is determined by facility based on the international technical review of abatement process in manufacturing.

<sup>4</sup>IPCC fifth assessment report, 100 year number

<sup>5</sup>GWP calculated based on component gases' GWPs (44% HFC-125, 4% HFC-134a, 52% HFC 143a)

<sup>6</sup>GWP calculated based on component gases' GWPs (25% HFC-125, 52% HFC-134a, 23% HFC-32)

<sup>7</sup>GWP calculated based on component gases' GWPs (39% HFC-23, 61% PFC-116)

305-2

Total Indirect (Scope 2) GHG Emissions (CO<sub>2</sub>e-ton)<sup>1</sup>



<sup>1</sup>All gases CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub> and NF<sub>3</sub> are included.

<sup>2</sup>In 2019, Western Digital used updated International Energy Association (IEA) emission factors, resulting in a significant decrease in Scope 2 GHG emissions. Western Digital historically used GHG Protocol emission factors for international electricity, but a change in availability of updated data precipitated our switch to the IEA factors.



# Product Lifecycle Impacts

## WHY IT MATTERS

### 103-1

Adopting circular economy principles is the way of the future. Partnering with our customers at every step, we aim to minimize the environmental impact of our products throughout their lifecycle and advance our technologies to adapt to evolving market demands.

## MANAGEMENT APPROACH

### 103-2

Western Digital's engineering teams—including Research and Development (R&D), Manufacturing and Quality Management—are responsible for managing our product lifecycle impacts. Our R&D team helps ensure product efficiency by design. In collaboration with our Corporate Sustainability function, the Product Environmental Compliance (PEC) team under our Quality Management organization manages Western Digital's overall lifecycle assessment (LCA) process.

### Design

Maximizing functional storage produced on a materials-used basis starts with efficient product design. Our product channels and vertical integration allow us to exactly match our storage to product, cost and performance needs from stringent original equipment manufacturer (OEM)

requirements to consumer products, while maximizing manufacturing efficiency. We strive to reduce the power consumption of our devices and raw materials usage on a per-byte basis and to increase capacity of our storage devices in a given form factor—which results in better energy and materials management per byte of storage.

### Lifecycle Assessments

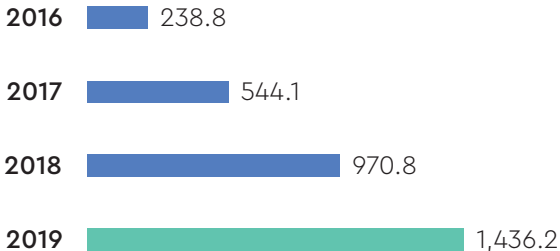
In 2019, Western Digital continued our progress with product LCAs, in accordance with ISO 14040 and ISO 14044, to understand impacts associated with each of our product lifecycle phases. We conducted a benchmarking study to understand our customers' approaches for evaluating product lifecycles to identify gaps, and compared different LCA databases and software service providers to find the most applicable lifecycle impact data for our products. We began preparations for multiple LCAs during 2019, all of which are scheduled to be concluded in 2020.

### Product Energy Efficiency and Emissions

Continued technological change can lead to increases in product-related energy consumption, driving our customers to commit to product energy reductions. Western Digital works to meet these demands by investing in the engineering required to continuously reduce our HDD and flash-based product energy needs.

### 302-5

Annual Electrical Power Savings Due to Hard Drive Power Efficiency Innovations (kWh in Millions)



We extensively test our HDDs as part of the manufacturing process to confirm integrity and energy performance. To reduce manufacturing energy and minimize capital expenditures for test equipment, we continuously work to improve our testing efficiency and reduce overall test time. While market demands require larger drive sizes, which tend to increase per-product test times, our engineering teams work to keep energy intensity for such tests trending downward. In 2019, Western Digital realized over 136 million kWh savings in power required to test our HDDs.

## Product End-of-Life

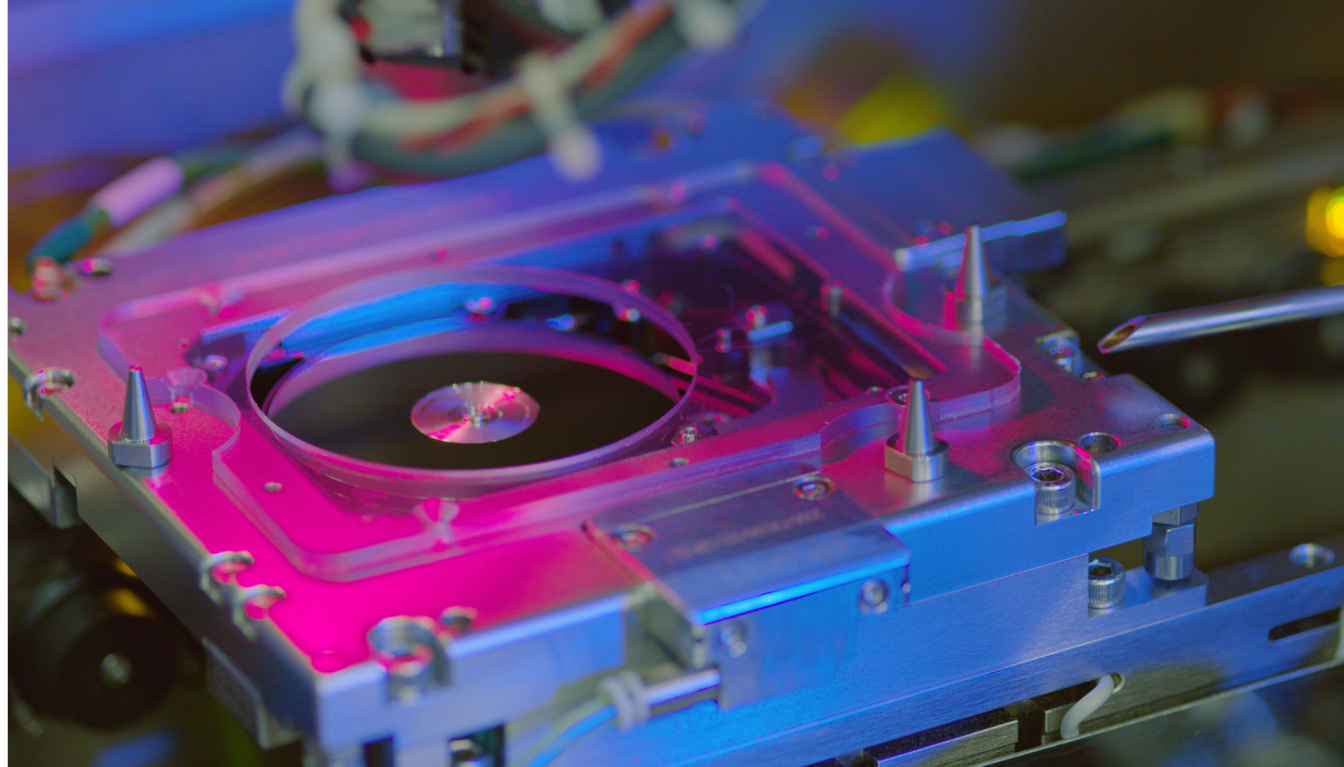
We are committed to making product recyclability easy. We support the [European Union Waste Electrical and Electronic Equipment \(WEEE\) directive](#). We label all Western Digital products and/or packaging with the appropriate end-of-life symbols for their respective regions. Additionally, we established global minimum requirements for handling and disposing electronic waste (e-waste) from our own facilities and offices to eliminate or minimize negative environmental impact. For more information, see [Western Digital's WEEE Statement](#).

## Packaging

Western Digital strives to minimize waste through the use of increasingly efficient packaging designs and processes. In 2019, we continued and extended our recent efforts to reduce packaging and material use:<sup>1</sup>

- Redesigned retail packaging to reduce our annual blister paper usage by over 475,000 kilograms (kg)
- Adopted thinner blister paper in our packaging to save over 256,000 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 26,000 kg per year
- Reengineered trays used in our manufacturing process to reduce our annual use of PET by more than 280,000 kg

<sup>1</sup>All metrics compared to 2010 base year



## HIGHLIGHT STORY

# Recyclability: Mail-Back Program

Launched on Earth Day 2020, Western Digital's [Mail-Back Program](#) is available through our online store, where we cover the cost of shipping so users can easily mail old or dead internal and external HDDs and SSDs from any manufacturer to our recycling partner for free.

Users receive confirmation that the drive has been recycled, a certificate of recycling from our partner and a coupon code to use for a future purchase on our site. Consumers can trust us with their drives knowing that our partner is certified using high standards in recycling.

## KEY METRICS

To underscore our commitment to minimizing the environmental impacts of our products, we track specific metrics that align with our strategic objectives. We are proud to report consistent year-over-year reductions in GHG emissions intensity for both HDD and SSD products since 2016. We also include the SASB Hardware Accounting Standard metrics related to our product lifecycle impacts.

280,000 kg less plastic used during manufacturing\*

\*Annually, compared to 2010 base year

### SASB TC-HW-410A.4

#### Weight of End-of-Life Products and e-Waste Recovered, Percentage Recycled (2019)

End-of-Life Material <sup>1</sup>	Disposed (metric tons)	Recovered (metric tons)	Percentage Recycled
NMP <sup>3</sup>	1,396.00	588.9	-
IPA (material)	9.3	9.3	100%
Aerosol cans (material) <sup>3</sup>	2.70E-03	2.70E-03	-
Batteries <sup>2</sup>	1.3	1.3	14%
E-waste <sup>3</sup>	315.3	293.2	-
		17.3	-
<b>Total</b>	<b>1,721.9</b>	<b>910.0<sup>3</sup></b>	<b>N/A</b>

<sup>1</sup> Materials used in the manufacturing of Western Digital storage products are disposed of according to local regulations in all regions in which Western Digital operates. End-of-life material such as chemicals and e-waste are disposed with special consideration on recovery where possible. Western Digital disposes of waste generated by all business activities, and also organizes regular community e-waste collection events for employees at our California and Rochester campuses to recycle household consumer electronics. In the United States, approximately 600 metric tons of used chemicals are reclaimed and sold for reuse.

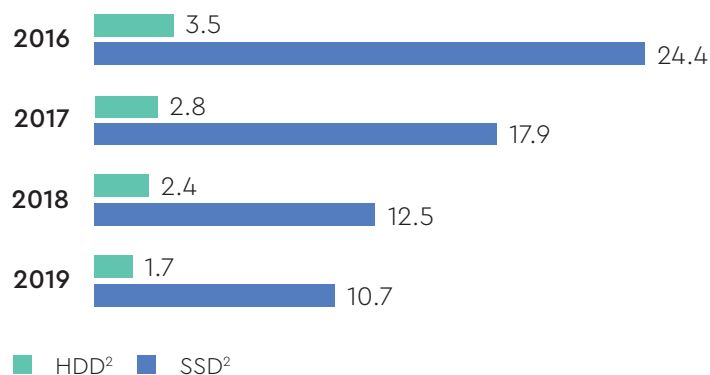
Approximately 93% of e-waste is recycled, primarily for precious metal recovery, and more than 5% of e-waste is refurbished and sold for reuse.

<sup>2</sup> Battery recovery and recycling limited to the Great Oaks site only. Data was unavailable for other facilities.

<sup>3</sup> Data unavailable for 2019.

### 305-4

#### GHG Emissions Intensity Ratio—HDDs and SSDs (tons/PB)<sup>1</sup>



<sup>1</sup>The denominator used to calculate the GHG Emissions intensity Ratio is shipped memory capacity.

<sup>2</sup>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> and NF<sub>3</sub> are included.



# 49%



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decrease in GHG emissions intensity for HDD  
and SSD products from 2016 to 2019

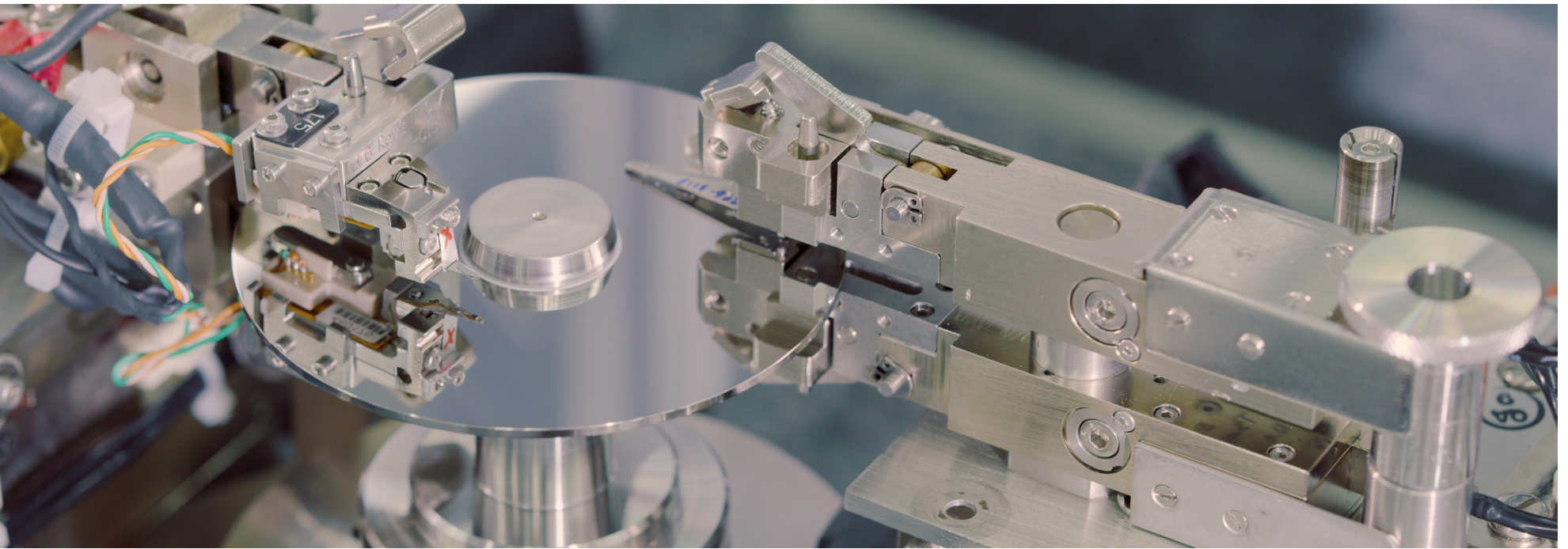
# 730K kg



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less paper used in packaging\*

\*Annually, compared to 2010 base year



# Chemicals and Hazardous Substances

## WHY IT MATTERS

### 103-1

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

## MANAGEMENT APPROACH

### 103-2

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

- **REO Global Environmental Health and Safety team:** Sets corporate environmental, health and safety management requirements for operational use of chemicals in Western Digital's research, development and manufacturing operations

- **PEC team:** Ensures products meet worldwide environmental regulations, including the EU Directive on the Restriction of the use of certain Hazardous Substances ([RoHS](#)), the EU Registration, Evaluation, Authorization, and Restriction of Chemicals ([REACH](#)), the EU [WEEE](#), the EU Packaging and Battery Directives and our OEM customer requirements



## \$0 in fines for product environmental non-compliance during 2019

Western Digital's PEC team sets specifications on use of hazardous chemicals and International Electrotechnical Commission (IEC) 62474 declarable substances based on all applicable legal regulations. All product suppliers are required to provide a Material Declaration Data Sheet (MDDS), Inductively Coupled Plasma laboratory test reports and Environmental Declaration of Compliance to ensure conformity with our specifications. We use the Global Environmental Management Systems database to store the supplier MDDS reports and manage environmental compliance for all our products.

### Policies

Western Digital's [IMS Policy](#) describes our commitment to environmental compliance for all of our products and operations, including chemicals and hazardous substances management. For more information on our IMS, please see the Energy and Emissions section of this report.

Additionally, our PEC 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

We believe in a proactive approach to managing product chemicals and hazardous substances in our operations and our products.

- Our Global Environmental Health and Safety Requirements Manual sets 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, 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 follow the United Nations [Globally Harmonized System of Classification and Labeling of Chemicals](#) to protect our manufacturing workers from chemicals and hazardous substances. We provide routine training to workers using this framework.

## KEY METRICS

### 103-3, 307-1

Though Western Digital products generally contain IEC 62474 declarable substances, we meet all legal requirements for those substances. The main IEC 62474 declarable substances used in Western Digital products—lead and nickel—are fully compliant with regulations wherever our products are sold:

- Lead is exempted under the EU's RoHS regulations, and Western Digital's use of lead is consistent with those regulations.
- Nickel is used as a component plating, which does not come into contact with consumers/users.

Our PEC team monitors our company-specific key performance indicators and reports them to the Vice President, Center of Excellence in Corporate Quality, quarterly. We are proud to report we met our 2019 target:

- **100% on-time response to customer product environmental inquiries:** In 2019, we met our target to respond to customer inquiries within the timeframe requested by our customers.<sup>1</sup>

<sup>1</sup>Based on customer-provided timeframes.

SASB Code	Accounting Metric	2017	2018	2019
TC-HW-410a.1	Percentage of products by revenue that contain IEC 62474 declarable substances	100%	100%	100%

# SUPPLY CHAIN

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We recognize that our business success would not be possible without the strong collaboration we have with our suppliers. We are committed to holding our suppliers to the same high standards of integrity as our company, and we work to ensure that they are equipped with the skills, tools and resources to do so.

## OUR APPROACH

Our supply chain approach, detailed below, has the overall objective of increased transparency and accountability, which we believe will lead to better working conditions and, as a result, a more responsible and resilient supply chain.

### 102-9

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 tantalum, tin, tungsten and gold (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 and contract manufacturers in China, Malaysia, Thailand, the Philippines, Taiwan and the United States develop the products we ship globally.

The majority of Western Digital's manufacturing workforce comprises directly hired employees whom we employ and manage. Because our employees are our most valuable asset, we take specific measures to oversee their working conditions and protect their long-term well-being.



# Human Rights and Labor Practices

## WHY IT MATTERS

### 103-1

Respecting and upholding human rights is a foundational aspect of how we do business. We work diligently to ensure that Western Digital employees and employees of our suppliers are provided with a working environment where they are treated with respect and dignity, and are provided with fair and safe working conditions.

## MANAGEMENT APPROACH

### 103-2

Our human rights and labor approach includes policies, due diligence, stakeholder engagement, grievance mechanisms and remedies.

### Policies

Western Digital has a set of tiered policies regarding human rights. First and foremost, Western Digital recently published a [Global Human Rights Policy](#), which outlines the company's commitment to respecting human rights for its employees and supply chain workers.

In addition, we set forth expectations for all Western Digital employees in our [Global Code of Conduct](#)—published in 11 languages—on which all employees receive annual training.

Country-specific Work Rules and policies, and factory-level policies, reinforce our commitment to treat all employees with dignity and respect.


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

### Due Diligence

Western Digital both proactively and reactively assesses human rights-related risks and potential impacts in connection with our policies, practices and management approach. We conduct human rights due diligence and impact assessments at regular intervals and whenever appropriate based on circumstances or reports.

Specifically, we monitor our human rights and labor practices in both owned and supplier facilities through audits and risk assessments. The RBA requires audits of factories generating finished goods biennially, and these thorough reviews of our facilities and practices help us maintain high standards for protecting our employees. We completed full-scope Validated Assessment Program (VAP) initial audits in our RBA audit factories in China, Malaysia and Thailand, where the audits resulted in Platinum and Gold certificates in Thailand, and a Platinum certificate in China. More detail on our Supplier Auditing and Vetting Program can be found below.

We also conduct periodic enterprise-wide risk assessments to specifically cover forced and child labor, and consider the types and locations of our operations, among other factors. The assessments help us ensure our practices are aligned with our deep commitment to protect the rights of our workforce and supply chain workers and create a positive and safe working environment for everyone.



96% of Tier 1 suppliers representing the top 80% of supplier spend audited in the RBA Validated Assessment Program during 2019

In RBA's 2019 closure audits of supplier factories, 43% of Western Digital's suppliers' facilities received Platinum; 16% received Gold; and 40% received Silver certificates, demonstrating excellence in labor, health and safety, environment, ethics and management systems.

## Stakeholder Engagement and Collaboration

We proactively engage with internal and external stakeholders as we evaluate our impacts and work to improve the effectiveness of our Human Rights Program:

- Since 2010, Western Digital has collaborated with other major electronics companies to launch supply chain capacity-building seminars and workshops. The seminars and workshops cover topics such as human rights, responsible hiring, foreign worker management, GHG emissions/carbon footprint, energy efficiency management, process chemical management and water stewardship.
- We work closely with RBA to ensure that our suppliers and their labor recruiters/brokers participate in RBA workshops such as the 2019 Ethical Recruitment Workshop, which took place in Taiwan.
- Western Digital works closely with several partners to reduce the risk of forced labor. In 2019, Western Digital along with other industrial colleagues successfully negotiated one supplier's full reimbursement of recruitment fees to over 9,000 migrant workers in Thailand.
- We have actively participated in the Responsible Labor Initiative (RLI) since its founding in 2017. 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 suppliers.

## Grievance Mechanisms

As detailed in the Integrity section of this report, Western Digital provides multiple avenues for employees to speak up concerning conduct contrary to our policies, including human rights violations, with the option to report concerns directly to their manager, Ethics and Compliance, Human Resources or Legal, or through our global Ethics Helpline. We offer the Helpline to anyone who suspects misconduct, whether employed by Western Digital or not.

## Remedies

If Western Digital learns of potential human rights abuses or other conduct contrary to our policies committed by our employees or suppliers, we take remedial action proportionate to the offense. Such remediation may include conducting an investigation, coordinating and tracking progress against corrective action plans, requiring additional audits (suppliers only), or possible suspension or termination of the relationship.

## Supplier Vetting and Auditing

**103-3, 408-1, 409-1, 412-1, 414-2,**

Western Digital leverages the RBA Code of Conduct, along with our own Global Human Rights Policy, 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 U.K. Modern Slavery Act of 2015 and the California Transparency in Supply Chain Act. Each year, we send letters to each of our suppliers about our commitment to the RBA Code of Conduct and the U.K. Modern Slavery Act, and we require suppliers representing 80% of our cumulative spend

to conduct annual self-assessments and biennial RBA VAP audits. Starting in 2020, we are expanding the scope of our supplier self-assessments to include suppliers representing 90% of our cumulative spend, plus strategic and single-source suppliers' facilities.

RBA assigns a third-party auditing firm based on its VAP manual and audit protocol to complete announced supplier audits. RBA releases its official audit report via the RBA-ON platform, where Western Digital monitors progress and drives change based on the findings. If labor issues exist, we follow standard procedures outlined in the VAP manual to assure suppliers' timely correction of non-conformance issues, and we closely follow up with them.

Western Digital also uses the RBA VAP audit as a tool to monitor the sustainability of our suppliers. We tie this requirement to our Supplier Performance Review scorecard and evaluate suppliers according to the performance assessed by the VAP audit.

Additionally, Western Digital's Audit Program follows the VAP protocol for end-product factories. Our Human Resources team conducts periodic audits of our labor brokers/agents.



We proactively engage with stakeholders as we work to improve the effectiveness of our Human Rights Program.

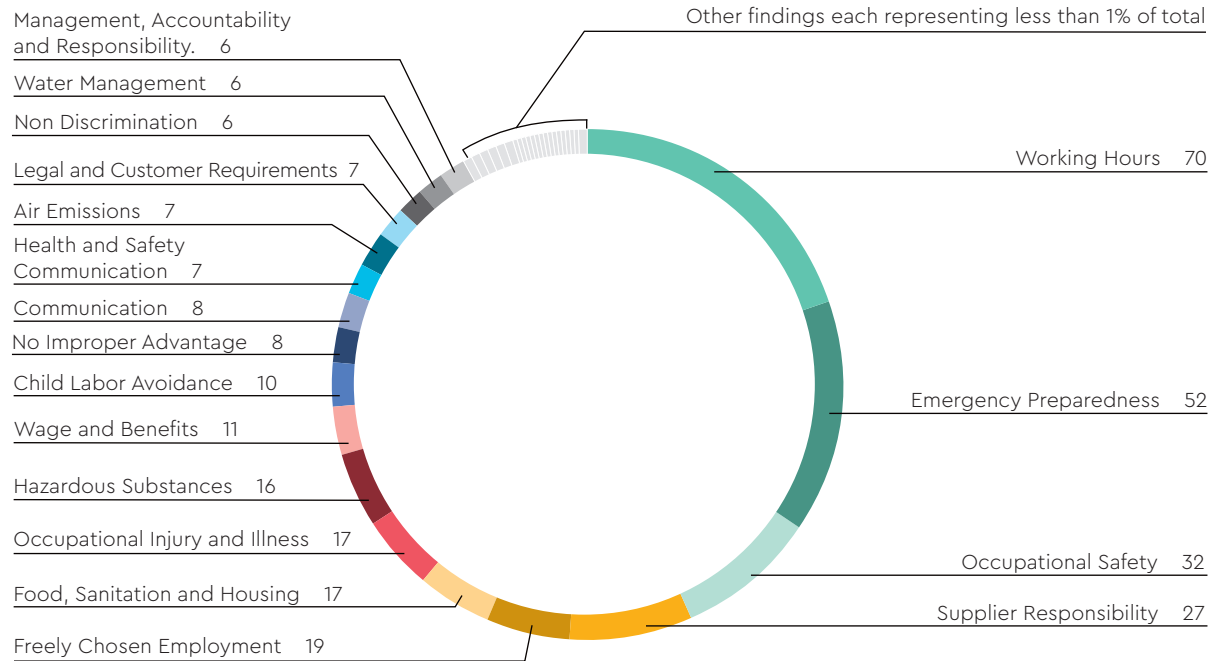
## Labor Practices

We recognize that human rights protections vary from country to country, and we pay close attention to how our manufacturing workforce may be impacted. We strive to ensure they are treated with dignity and respect, and experience fair, respectful and sustainable working conditions.

Western Digital's indirectly hired workforce is coordinated through labor brokers (specifically in China and Malaysia), who must meet the requirements of the RBA Code of Conduct. We conduct internal audits of these brokers to continuously monitor their compliance and verify that they are protecting workers' fundamental rights. Since 2013, we have fully paid or reimbursed recruitment fees for employees and have prohibited labor brokers and their agents from collecting such fees from prospective employees, to promote freely chosen employment.

## KEY METRICS

### RBA VAP Supplier Audit Non-conformance by Category<sup>1</sup>



<sup>1</sup>We track non-conformances from supplier audits to help us identify supply chain risks and inform our initiatives to improve the resiliency and sustainability of our supply chain.

## Suppliers Assessed Using RBA Validated Assessment Program

SASB Code	Accounting Metric	2016	2017	2018	2019
TC-HW-430a.1	Percentage of all Tier 1 supplier facilities audited in the RBA Validated Assessment Program or equivalent <sup>1</sup>	23%	48%	87%	96%
	Percentage of high-risk Tier 1 supplier facilities audited in the RBA Validated Assessment Program or equivalent <sup>2</sup>	N/A	N/A	N/A	N/A
TC-HW-430a.2	Tier 1 suppliers' non-conformance rate with the RBA Validated Assessment Program or equivalent <sup>3</sup>	-	11%	8%	6%
	Tier 1 suppliers' associated corrective action rate for priority non-conformances <sup>3</sup>	-	76%	100%	100%
	Tier 1 suppliers' associated corrective action rate for other non-conformances <sup>3</sup>	-	84%	93%	93%

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

<sup>2</sup>The RBA Online SAQ identified no high risk facilities for Western Digital.

<sup>3</sup>A technical error with the RBA online portal has made 2016 data unavailable.

# Critical Minerals and Metals

## WHY IT MATTERS

### 103-1

Western Digital relies on a variety of raw and subsidiary materials—including 3TG or “conflict minerals”—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. Long before the adoption of the U.S. Securities and Exchange Commission’s (SEC) Conflict Minerals Rule, we began working with our suppliers to verify responsible sourcing of 3TG.

## MANAGEMENT APPROACH

### 103-2

Western Digital maintains a cross-functional team of senior staff for our Responsible Minerals Steering Committee, which oversees our Responsible Minerals Program. Our Senior Vice President and Chief Procurement Officer leads this program, comprised of representatives from Legal, Procurement and Quality Management. The team reports to senior leadership on a regular basis and reports the findings of our compliance efforts to the Audit Committee of the Board of Directors.

We are committed to supporting responsible sourcing of conflict minerals and their derivatives, cobalt and other minerals from the Democratic Republic of Congo (DRC) region and other Conflict Affected and High-Risk Areas (CAHRAs). Our [Responsible Minerals Policy](#) outlines responsible sourcing practices, which are reviewed regularly. As part of our ongoing commitment to transparency, we added cobalt to our policy and program, and we continually endeavor to practice responsible sourcing from the DRC region and other CAHRAs. This policy, updated in March 2020, demonstrates Western Digital’s expectations of our suppliers:

- Responsibly supply 3TG and cobalt that are “DRC conformant” to Western Digital
- Ensure that any 3TG supplied to Western Digital are from recycled or scrap sources or do not finance armed groups in the DRC region and do not contribute to child labor, human rights abuses or environmental pollution
- Responsibly source all minerals, including cobalt, from the DRC region and other CAHRAs
- Require their own suppliers to adopt similar policies

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

## Industry Partnerships

Western Digital actively participates in the RBA’s [Responsible Mineral Initiative \(RMI\)](#), allowing us to use best practices in responsible minerals sourcing:

- Collaborate with customers, suppliers and 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 Country Risk Map, Reasonable Country of Origin Inquiry (RCOI) data, smelter database and risk readiness assessment
- Conduct ongoing due diligence and stay up-to-date on smelter status changes, industry trends and key insights
- Use RMI’s e-Learning academy to provide training internally to employees and externally to suppliers



Read more in  
our Conflict  
Minerals Report »



# Responsible Minerals Risk Mitigation Program

## SASB TC-HW-440a.1

Western Digital's Responsible Minerals Risk Mitigation Program involves a five-step due diligence process aligned with the Organization for Economic Co-operation and Development (OECD) Guidance.



### Identify Risks

To identify risks in our supply chain, we use three main resources from the RMI:

1. Conflict Minerals Reporting Template (CMRT): Facilitates the transfer of information through the supply chain regarding mineral country of origin, and smelters and refiners used; we require all in-scope suppliers to complete and submit the CMRT.
2. Cobalt Report Template (CRT): Facilitates the transfer of information through the supply chain regarding cobalt country origin and smelters and refiners used; we require all in-scope suppliers to complete and submit the CRT.
3. Country Risk Map Tool: Provides a framework and guidance to monitor high-risk suppliers and smelters and allows our program manager to develop a country risk indicator to monitor risk levels by country with an 80% and above confidence level.

The CMRT, CRT and Country Risk Map Tool together allow us to map our smelters and suppliers, and determine which sourcing practices will be evaluated with RCOI data. Our approach includes several key components:

- Developing a risk management plan that includes due diligence reviews of relevant suppliers and smelters or refiners
- Using tools available for RMI members to review the smelters or refiners reported by our suppliers and assess the quality of the responses in their CMRTs
- Incorporating the information and the result of this assessment into supplier risk profiles in our supply chain base

- Reviewing risk profiles to mitigate any risks to suppliers or smelters
- Informing Procurement of the high-risk suppliers and developing an action plan to mitigate the risk
- Working with suppliers to mitigate the risk for identified high-risk smelters, via direct outreach with the smelter or indirectly via collaborating with customers or engaging with industry-level working groups

### Conduct Supplier Risk Assessment

We conduct risk assessments based on multiple factors, including smelter or refiner certification status, "red flags" identified and the supplier relationship. Western Digital escalates suppliers in higher-risk categories in accordance with our risk mitigation procedures. We use a formal tracking mechanism to track the supplier risk assessment and the risk mitigation activities performed.

## EXECUTE RISK MITIGATION ACTIVITIES

We execute appropriate risk mitigation actions to build awareness and capacity to reach our goal of conflict-free sourcing. The table below outlines different actions in order of severity.

Risk Mitigation Reference	Request or Inquiry Condition	Intended Effect
1.	Inquiry related to Critical Minerals	To align Western Digital's Responsible Minerals Policy and expectations
2.	Follow up + adding in subsidiary procurement/ commodity manager	To support the urgency of the request
3.	Escalate to higher management (suppliers and internal)	To support the urgency of the request
4.	Formal complaint	To demonstrate Western Digital's commitment to adhering to the responsible minerals initiative
5.	Temporary reduction or suspension of trade	To encourage suppliers to source responsibly and mitigate high risk identified within supply chain

Below is a summary of our conflict minerals risks in 2019.

Low Risk	Low Risk	Low Risk
7 Smelters of Concern	3 Reliability Concern	13 Company Level Declaration
<ul style="list-style-type: none"> <li>▪ 1 supplier reported smelter ceased operation (previous conformant smelter)</li> <li>▪ 6 suppliers impacted with the smelter status change on 31-Jan-2020 from conformant to not applicable status (conformant smelter); Status change due to ceased operation and no longer meeting RMAP protocol; Team is verifying current sourcing information</li> </ul>	<ul style="list-style-type: none"> <li>▪ Further due diligence activity required by supplier, as declared contradictory answer in questionnaire</li> </ul>	<ul style="list-style-type: none"> <li>▪ 11/13 CMRTs with all conformant smelters</li> <li>▪ 2/13 CMRTs reported not applicable smelters, which delisted from conformant list on 31-Jan-2020 due to ceased operation and no longer meeting smelter definition</li> <li>▪ Suppliers have sufficient knowledge in this program</li> </ul>

For more detailed information on our Responsible Minerals Program measures in 2019, including commitments and steps taken to mitigate the risk that the 3TG in our products does not benefit armed groups, please see our [2019 SEC-filed Conflict Minerals Report](#).

## AWARDS AND RECOGNITION

103-3

In the Responsible Sourcing Network's (RSN) 2019 Mining the Disclosure Report, Western Digital ranked 1st in the HDD manufacturing industry and 4th in the overall computer hardware industry for the third consecutive year. Our overall performance again scored within the "Good (60+)" threshold when compared to all industries. We use this ranking as an indicator for us to maintain and improve our performance year-over-year. For more information on the RSN, please visit their [website](#).

As a supplier ourselves, Western Digital is subject to similar performance assessments from our customers. Multiple customers have consistently acknowledged our excellent performance, citing numerous key indicators such as energy efficiency, emissions reduction, conflict-free smelters, voluntary sustainability reporting and RBA audit compliance.

## KEY METRICS

414-2

In 2019, we audited 100% of our in-scope suppliers for conflict minerals. We identified 32% of those suppliers using smelters of concern. By the end of 2019, 95% of the in-scope suppliers successfully reported sourcing from conformant smelters. The remaining 5% reported that they ceased operations. Additionally, we directly or indirectly engaged with 26 smelters out of 263 total in our supply chain to participate in a Responsible Mineral Assurance Process (RMAP) Program.

# 100%



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of in-scope suppliers completed CMRTs in 2019

# 95%



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of suppliers are Smelter Conformant in 2019

# WORKFORCE

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Our people are Western Digital's most valuable resource, and we strive to treat them accordingly. We believe we can achieve the best business outcomes by empowering our diverse and talented employees to make an impact, together.



# Diversity and Inclusion

## WHY IT MATTERS

### 103-1

Corporate leaders often state that a company's people are its most important asset. Though such a declaration has become rather cliché in company statements far and wide, at Western Digital, we are doing our best to live authentically by our appreciation for people. We believe that our employees, more than bits and drives, are absolutely our most valuable resource. Why? Well, it's simple. It's the people of Western Digital—in all their myriad talent and experiences—that give us our competitive edge as a company.

As we say in our Diversity and Inclusion Statement, we're convinced that the fusion of various ideas results in greater innovation and better business outcomes. Frankly, we know we're at our absolute best when we leverage the diversity of our more than 60,000 employees in 30 countries around the world. So, from our factories in Thailand to our R&D centers in Israel and our engineering sites in Silicon Valley, we are committed to an inclusive environment where every individual can thrive.

To be sure, we're not there yet. We have more work to do, for example, to promote women into coveted tech and leadership roles. We also have a lot more work to do in recruiting Black and Hispanic people to the company, but we're hard at work taking the steps necessary to make progress.

We know becoming a sufficiently diverse and inclusive company is a journey, and we're determined to develop a culture in which underrepresented groups, and all the employees of Western Digital, feel they truly belong.

## MANAGEMENT APPROACH

### 103-2

Western Digital's Vice President of Global Diversity and Inclusion is responsible for the execution of our global diversity and inclusion initiatives and commitments. The VP partners closely with our CEO and our Chief Human Resources Officer, who report progress to the Board of Directors on a regular basis.

At Western Digital, we apply our diversity and inclusion efforts globally. The Diversity and Inclusion team communicates our initiatives to representatives at our various international sites and receives updates on regional progress. Additionally, each country-specific employee handbook discusses how Western Digital is working to promote workforce diversity. We are proud to share key highlights from 2019:

- Completed unconscious bias training for our top global leaders
- Transformed Employee Resource Groups to Business Resource Groups (BRGs)
- Launched an Advancing Women in Leadership program

- Conducted an annual U.S. pay equity analysis with plans in place to pilot pay equity analysis beyond the United States at two global sites in 2020
- Implementing Our Anti-Harassment and Discrimination Policy

## Unconscious Bias Training

Our organization is committed to unconscious bias training to build an inclusive culture that supports diversity. We successfully delivered in-person unconscious bias training to more than 430 of our highest-ranking leaders in the United States, equipping them to lead inclusively and building ability to identify unconscious bias. The next step is to deliver unconscious bias training to the remaining people managers in the United States.

## Business Resource Groups

In 2019, the Diversity and Inclusion team expanded the number of Western Digital's employee-based affinity groups to seven, with 15 global chapters at sites in India, China, Israel, Thailand, Malaysia and the Philippines. The Diversity and Inclusion team led the groups through a strategic branding initiative to create greater connection to our corporate values, and to create more cohesion among the various networks. Each group's brand now reflects what we call the "Power of We," signifying a sense of inclusion and belonging within the networks.



## Implementing Our Anti-Harassment and Discrimination Policy

In 2019, Western Digital conducted focused training on our Global Anti-Harassment and Discrimination Policy, supported by harassment and discrimination training for all employees. This policy explicitly prohibits harassment in the workplace from any employee, customer, vendor, supplier, business partner or third party. Further, the policy provides numerous avenues to report instances of harassment and discrimination and allow for appropriate action to be taken. Relevant Western Digital employees are required to participate in online harassment and discrimination training to support the policy.

## AWARDS AND RECOGNITION

103-3

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

The Women's Choice Award recognized Western Digital as a Best Company for Millennials in 2019 and again in 2020. Our focus on investing and helping millennials and women grow professionally to advance their career while also catering to their lifestyle led to these awards. 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.

Our BRGs not only serve as a platform for employees to build relationships and foster a sense of belonging, they also actively focus on ways to support our business—from recruiting talent to delivering innovative product suggestions. All Western Digital BRGs are open to any employee interested in joining.

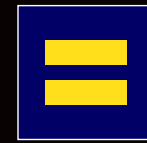
### Women's Development Programs

Western Digital is committed to increasing the number of women in technical fields and leadership positions at our organization. We plan to accomplish this by developing from within, as well as recruiting externally to hire more women into leadership roles. We successfully launched an Advancing Women in Leadership program in 2019. The pilot identified 24 of the company's highest-performing female employees, and helped them enhance their leadership skills—from personal confidence to management and influence—so they're more equipped to rise to the top ranks of leadership within the organization. Additionally, each participant's leader (or a surrogate manager) also participates in the program to demonstrate their personal engagement in, and accountability for, each woman's career development.

Western Digital offers female employees several development opportunities through organizations such as our Women's Impact Network and Women in IT. These employee-led organizations highlight challenges for women, and advocate for women's advancement and professional development by offering internal and external conference opportunities for learning, networking, coaching, and internal leadership experiences.

### Growing Our Diverse Talent Pipeline

We actively work to increase the diversity of our talent pool, from interns to executive leadership roles. The Diversity and Inclusion team partners with our Talent Acquisition team, Human Resources Business Partners and other centers of excellence on approaches to growing a more diverse candidate pipeline and recruiting the best and brightest globally. For example, we are strengthening relationships with diversity-focused clubs and programs at our target universities, and exploring new relationships with colleges that graduate significant percentages of underrepresented students.



**HUMAN  
RIGHTS  
CAMPAIGN®**

**The Human Rights  
Campaign (HRC)**

2020 Best Places to Work  
for LGBTQ Equality

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**WOMEN'S CHOICE AWARD®**  
THE VOICE OF WOMEN

**Women's Choice Award**

2020 Best Companies: Millennials

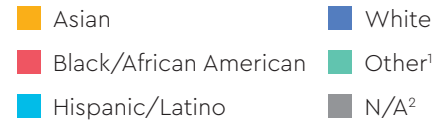
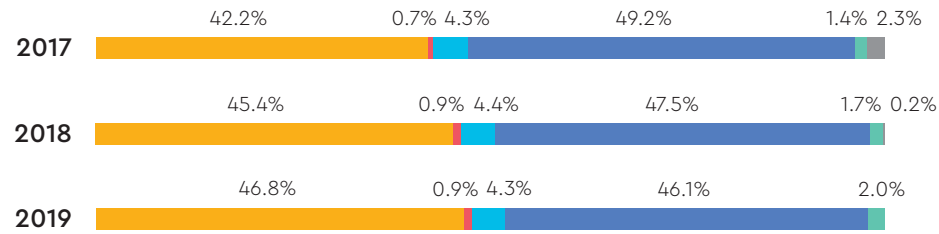
2020 Best Companies: Diversity

# KEY METRICS

405-1, SASB TC-HW-330a.1

## Racial/Ethnic Group Representation of U.S. Employees

### Management

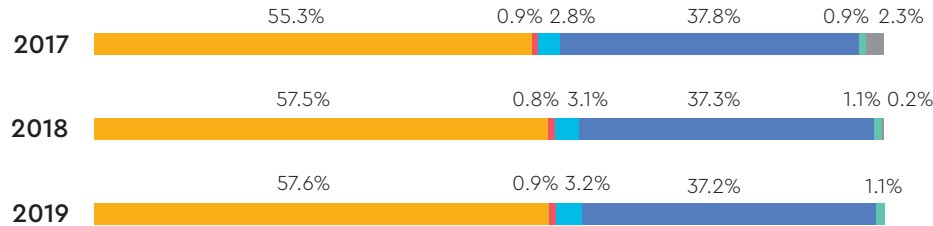


<sup>1</sup> Other includes the following classifications: Native American or Alaska Native, Native Hawaiian or Pacific Islander, and "Two or More Races".

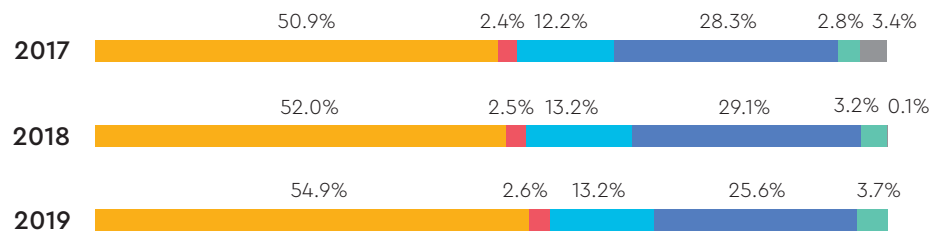
<sup>2</sup> N/A—Gender and racial/ethnic group data not available for 2017 and 2018

<sup>3</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.

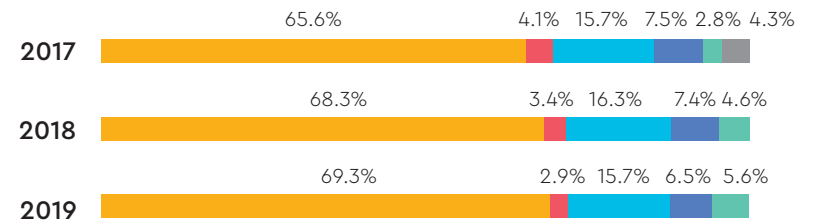
### Technical Staff



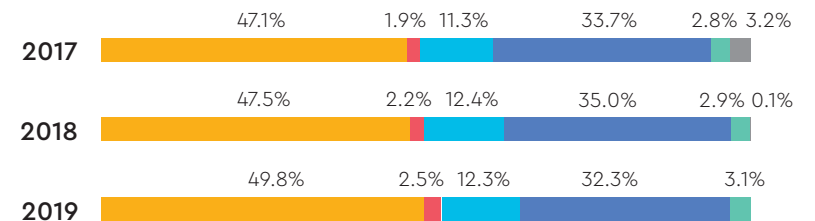
### All Other Employees



### Factory Employees<sup>3</sup>



### Non-Factory Employees

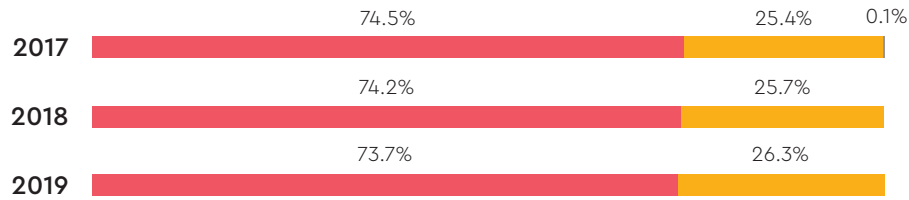




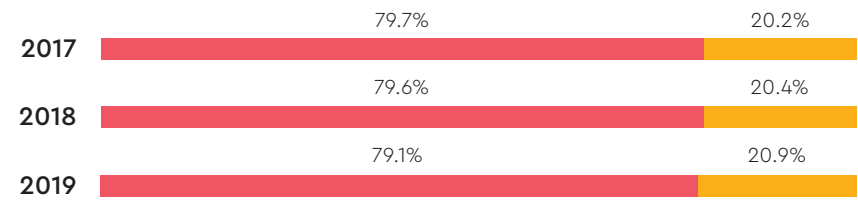
## Gender Representation of Global Employees

Male Female N/A<sup>2</sup>

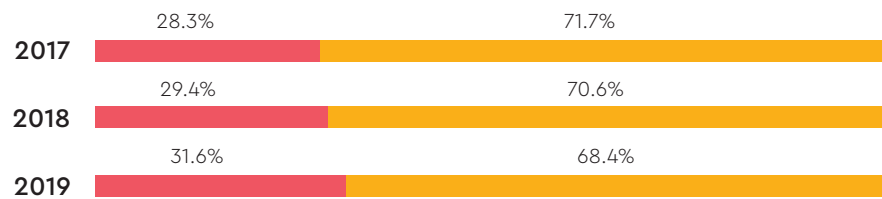
### Management



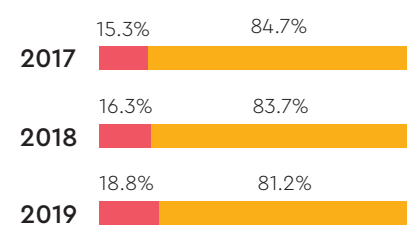
### Technical Staff



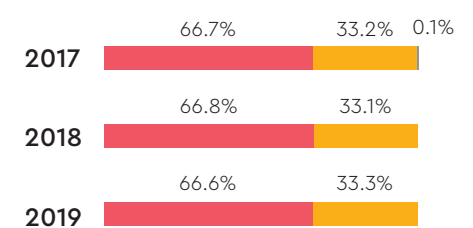
### All Other Employees



### Factory Employees<sup>3</sup>



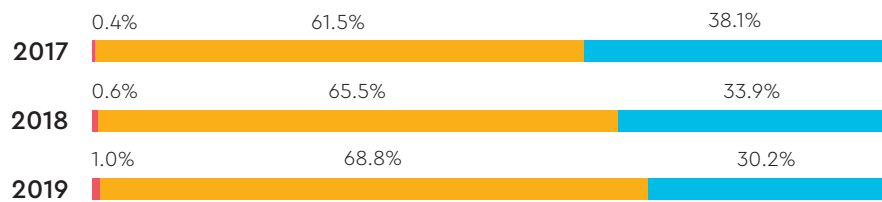
### Non-Factory Employees



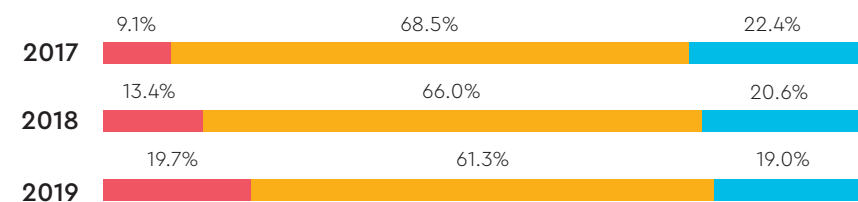
## Age Representation of Global Employees

Under 30 30-50 Over 50

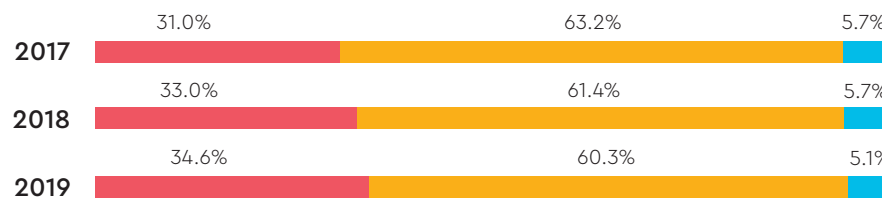
### Management



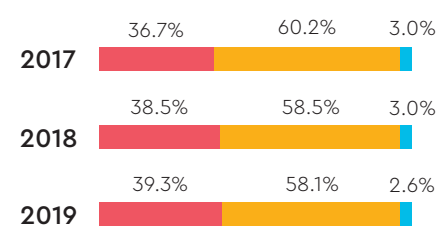
### Technical Staff



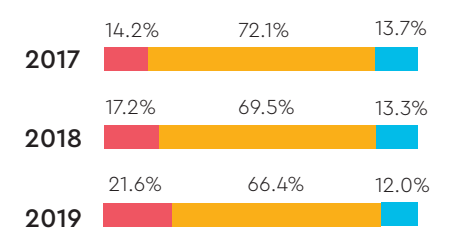
### All Other Employees



### Factory Employees<sup>3</sup>



### Non-Factory Employees



# Employee Attraction, Retention and Engagement

## WHY IT MATTERS

### 103-1

At Western Digital, our employees drive our success and help shape the future. To continue leading the data storage 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.

## MANAGEMENT APPROACH

### 103-2

Our Human Resources function is a strategic part of our company, responsible for creating a strong workforce culture and differentiating Western Digital as an employer of choice. Our business strategy planning process incorporates talent needs and assesses sustainable and scalable workforce strategies.

Our Board of Directors is actively involved in Western Digital's workforce retention and engagement. Our Compensation and Talent Committee reviews our human capital management policies and programs covering company culture, talent development, employee retention, and diversity and inclusion. Our Chief Human Resources Officer communicates regularly with the Board on our retention strategy, talent management, succession planning and diversity.

## Engagement

We believe being transparent with our employees fosters engagement and trust. Immediately following our quarterly earnings releases, Western Digital holds a global employee town hall led by our Chief Executive Officer. These meetings inform employees of the direction of the business, highlight our successes and share progress toward goals and objectives. As a follow-up to these 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 town hall meetings on Western Digital's intranet for employees to access at any time.

In early 2019, we unveiled a refreshed vision and mission statement enterprise-wide, propelling a culture renovation exercise anchored in this new vision, mission and business strategy process. In 2019, we launched our first culture and engagement survey to all of our employees. For our technical/professional employees, we focused on the culture attributes that our employees felt were core strengths, inspirational and important additions, and key differentiators for us in the marketplace. For our factory workers, we focused on the attributes that keep them engaged in the workplace. The aggregation of these insights shaped discussions for our leadership team around the culture attributes most critical to achieve our vision and mission. That effort culminated in an official launch of our culture attributes in February 2020.

## Attraction and Retention

Western Digital's Talent Acquisition, Talent Development, and Human Resources Business Partner teams collaborate with our business leaders to attract and retain diverse, top talent for all areas of the business. Our global enterprise employment and recruitment brand highlights Western Digital employees to showcase why Western Digital is a great place to grow one's career. Additionally, our partnerships around the globe continue to be a key strategic initiative for future talent pools, including growing our diverse candidate pipeline. See the Diversity and Inclusion section of this report for more information.

### 103-3

Turnover rates indicate the health of our workforce culture, and we monitor these metrics carefully for insights into employee uncertainty or dissatisfaction. Additionally, turnover rates affect Western Digital's financial performance. We are proud to report our worldwide turnover rate for voluntary turnover is 10%, which is below the industry average of 13%.<sup>1</sup>

<sup>1</sup>Western Digital turnover rates are based on aggregate data, with the industry average sourced from Mercer/Comptrix.

## LEARNING AND DEVELOPMENT

### 404-2

Western Digital's Global Management Development Program (GMDP) is our enterprise-wide career development program that 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 1,290 managers across the globe completed the training through the end of 2019.

In addition to our enterprise-wide GMDP, we offer training at a regional level based on needs. The programs and classes vary from MS Office software training, to IT productivity and perfecting presentation skills. Classes are instructor-led and offered online via regional vendors.

### 404-3

All manufacturing employees receive performance assessments based on specific manufacturing tasks. The remainder of the organization, comprising the technical and professional employee population, receives quarterly check-in meetings and annual reviews.

## KEY METRICS

### 401-1

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

### 102-8

#### Information on Employees and Other Workers<sup>1</sup>

		Temporary Employees	Full-Time Employees	Part-Time Employees	Regular Employees
Gender	Male	N/A	37,593	33	37,626
	Female	N/A	26,828	33	26,861
Region	United States	N/A	7,891	36	7,927
	Asia	N/A	55,344	7	55,351
	Other	N/A	1,199	23	1,222

<sup>1</sup>Data from Western Digital's 12/31/2019 headcount report

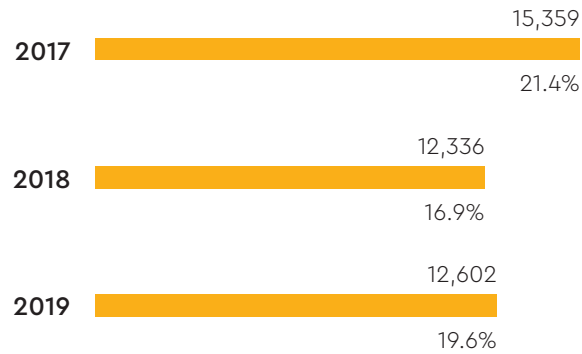
### 401-2

In each country, Western Digital offers competitive benefits, which typically include the following:

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

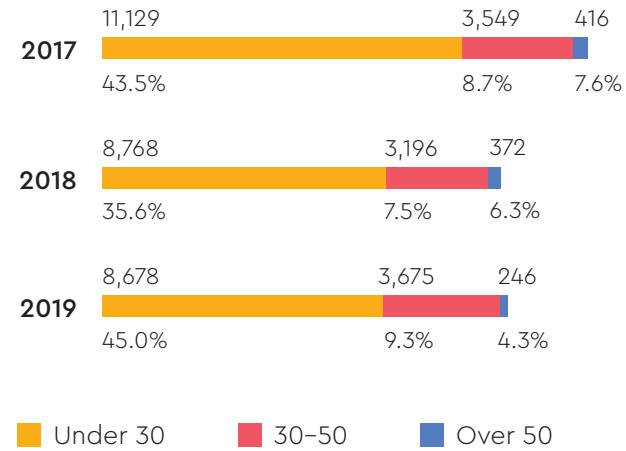


## Total Employee Hire Rates<sup>1</sup>

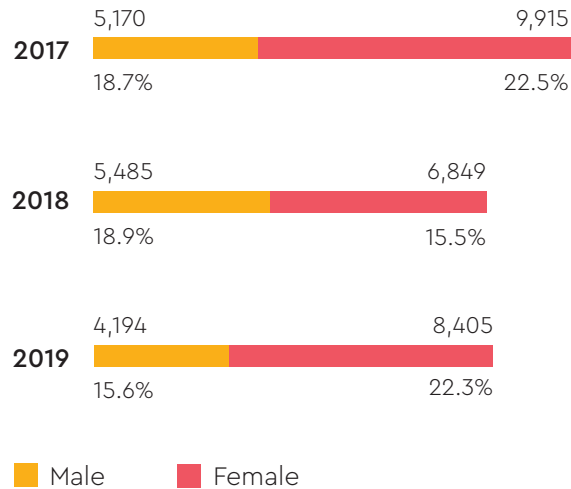


<sup>1</sup>Hire rate is calculated as the total number of hires divided by the total headcount at the end of 2019. Employees without gender or birthdate in the source data included in Total only and not in age, gender, and region breakouts.

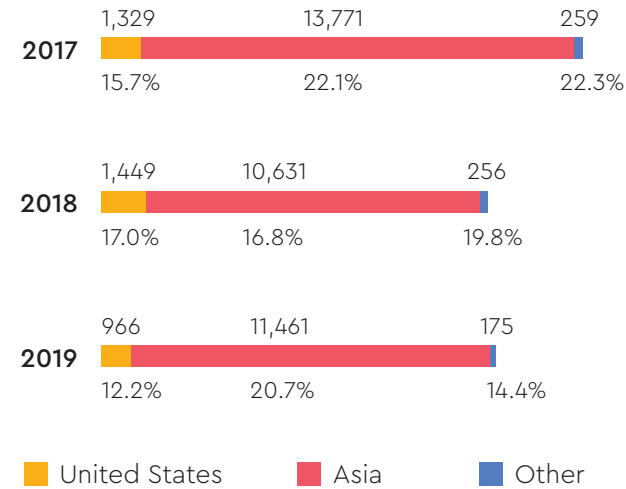
## Employee Hire Rates by Age Group



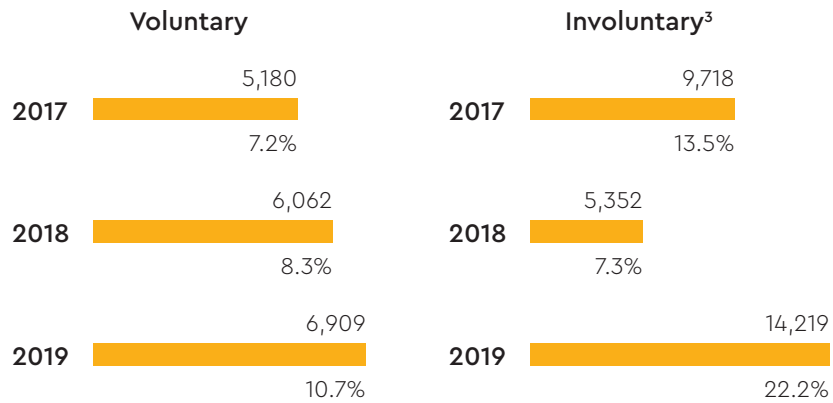
## Employee Hire Rates by Gender



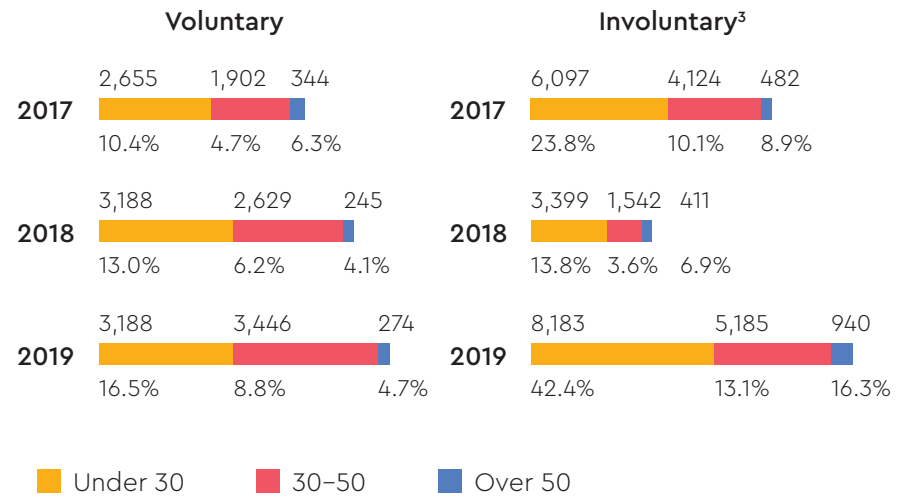
## Employee Hire Rates by Region



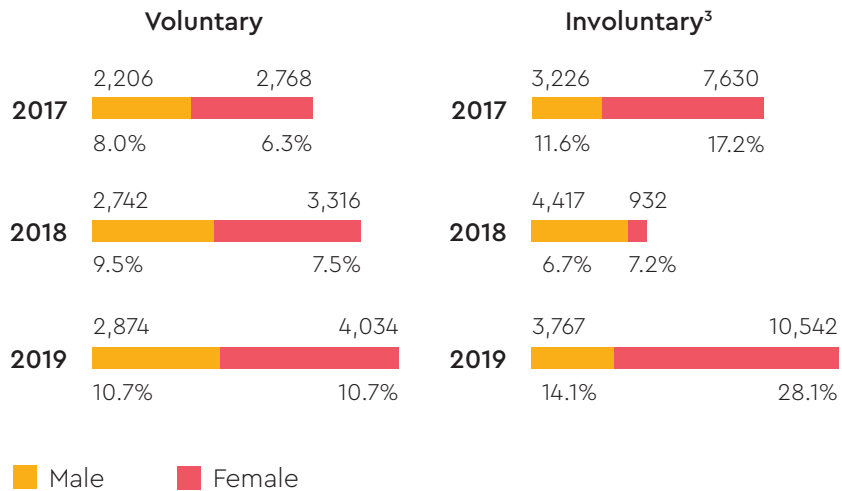
## Total Employee Turnover Rates<sup>2</sup>



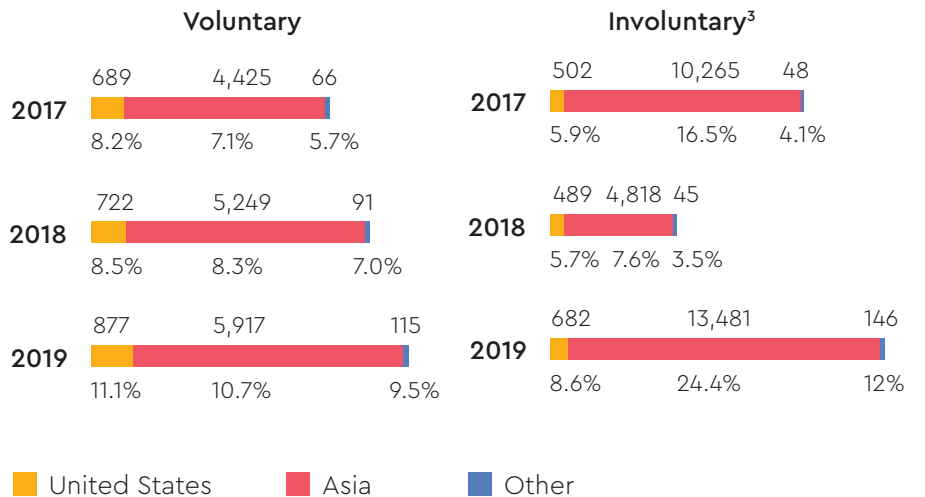
## Employee Turnover Rates by Age Group



## 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 total headcount at the end of the calendar year. Employees without gender or birthdate in the source data included in total only and not in age, gender, and region breakouts. Historical data prior to the company consolidating data into one HR system in 2019 is reconciled from a variety of sources. The data consolidation and cleanup has resulted in a revised and restated dataset for 2017 and 2018.

<sup>3</sup>CY19 involuntary turnover rates were significantly impacted by restructuring tied to business divestitures.

# Health and Safety

## WHY IT MATTERS

### 103-1

Health and safety are 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.

## MANAGEMENT APPROACH

### 103-2

All Western Digital employees are responsible for maintaining a safe and healthy work environment. We expect every manager to establish and reinforce our health and safety culture through three commitments:

- Implementing and enforcing Western Digital's Environmental, Health, Safety and Security (EHS&S) Program requirements, and 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 (OHS) in support of our integrated management 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.

## Occupational Health and Safety Management System

### 403-1

Our certified OHS Management System is part of our company-wide IMS, and applies to all operations, all employees and anyone acting on our behalf globally (including contractors).

### 403-5

Each site's OHS Management Program identifies job-specific and task-specific training to employees, and meets Western Digital's objectives:

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

Western Digital trains our Emergency Response Teams (ERTs) to respond to an incident such as a fire, medical crisis, earthquake, 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.

Western Digital's global recordable and lost time injury and illness incident rates are less than a quarter of the U.S industry averages.\*

\*According to the most recent U.S. Bureau of Labor Statistics data (2018) for Lost Time Incident Rate and Total Recordable Incident Rate.

## Health and Safety Standards

All Western Digital factories are certified to the Occupational Health and Safety Assessment Series (OHSAS) 18001 standard, and have begun the transition to ISO 45001. In 2019, all final-build manufacturing sites were included on a new multi-site ISO 45001 certificate. Western Digital also conducts both internal and external audits to evaluate compliance with applicable health and safety laws, regulations and standards.

As part of our transition to ISO 45001, Western Digital formalized the processes related to consultation and participation of workers. Through our global IMS, we establish the general requirements and expectations, and sites further define and implement location-appropriate methods for effective engagement with workers on health and safety matters. A common approach is to form safety committees at each worksite, comprised of cross-functional teams that 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 and illnesses, assess their root causes and recommend corrective actions to avoid future recurrences. Committee members also conduct periodic facility inspections and organize safety activities.

## Hazard Identification and Risk Control

### 403-2

Our IMS involves a two-tiered approach for identifying hazards and assessing risks and opportunities. 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 their approach based on high-hazard risk areas in the specific location. Certain sites go beyond this initial level of assessment, further assessing equipment, tools, chemicals and processes. Each hazard is scored on its level of severity and likelihood to develop a composite risk rating. We prioritize risks rated high and immediately seek to mitigate them to a medium-risk level.

All employees have a right to stop work that they believe could cause injury or ill health, and all Western Digital manufacturing processes have a standard Emergency Power-Off (EPO) or Emergency Machine Off (EMO) switch if an employee identifies an on-site hazard. Additionally, employees have three avenues through which to report work-related hazards:

1. Human Resources business partner
2. Manager
3. Western Digital's Ethics Helpline

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
- Investigate accidents and "near misses," identifying and correcting root causes
- Include results and trends of hazard identification and risk control in the Management Review process in addition to the worksite analysis

In 2019, we focused on improving machine safety interlocks to ensure the required engineering control measures are in place and functional. Another focus area was to implement and/or enhance our Safety Good Catch Program, which is essential to enhancing employee awareness of their surroundings and keeping them safe. A safety good catch is recognition by a worker of a condition or situation that had the potential to cause an incident, but did not cause one due to corrective action and/or timely intervention by the worker. In 2019, Western Digital workers identified and reported 3,669 safety good catches, most relating to minor hazards.

### 403-7

Western Digital hires contractors and third parties for specific projects or jobs requiring expertise outside our employees' skills or based on business strategy. Our OHS planning process includes evaluating and mitigating potential hazards and risks related to a specific job or project reviewing the activity area and checking licenses of all operators. We require employees to complete rigorous driver certifications before transporting chemicals or waste.

In 2019, Western Digital updated our Contractor Safety Program to enhance safety management from a lifecycle perspective. The program now includes steps at all stages of the contractor lifecycle: specifying expectations to contractors in procurement agreements/contracts, evaluating the qualifications of candidate contractors, identifying hazards for selected contractors, assessing risks and opportunities related to the project, and evaluating safety performance. We also published outsourcing operating procedures to standardize the process.

## Communication and Training

### 403-4

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

- In-person training and web-based training
- On-the-job training
- Periodic communications on IMS via Western Digital's intranet
- Promotional materials on our internal broadcast system, ConnectTV
- Internal blogs
- Monthly newsletters
- Email communications

We also communicate with employees on the topics of emergency preparedness, injury or illness prevention, industrial hygiene, physically demanding work, wellness, machine guarding and living conditions.

## Health and Well-being

### 403-3, 403-6

Western Digital prioritizes the long-term health and well-being of our employees by continuously improving the quality of our health and wellness services. Our 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 meeting licensing requirements with certified or licensed medical professionals where workers can obtain immediate treatment. If work-related activities cause injuries, our medical professionals engage the local EHS&S team to investigate and correct the root cause and contributing factors. Additionally, we contract with occupational health clinics for sites in the United States that serve the same function with similar processes. All medical professionals working either in on-site clinics or contracted clinics meet licensing requirements, and all medical clinics meet applicable regulatory and accreditation requirements.

## KEY METRICS

### 103-3

Western Digital actively tracks our occupational safety and health performance to evaluate the effectiveness our management approach. We are pleased to report industry-leading safety performance.



### 403-8

	2016	2017	2018	2019
Workers covered by an OHS Management System	100%	100%	100%	100%



	2016		2017		2018		2019	
	#	%	#	%	#	%	#	%
Employees								
Employee fatalities	0	0	0	0	0	0	0	0
High-consequence work-related injuries (excluding fatalities)—employees	0	0	1	0.001	2	0.003	2	0.003
Employee Lost Time Incident Rate (LTIR) <sup>1</sup>	43	0.06	38	0.05	48	0.073	44	0.074
Recordable work-related injuries (including fatalities)—employees	72	0.1	84	0.12	88	0.133	81	0.137
Employee Total Recordable Incident Rate (TRIR) <sup>1</sup>	72	0.1	84	0.12	88	0.133	81	0.137
Main types of work-related injury—employees	Slip/Trip/Fall, Struck/on/by, Machine safety, Material Handling/Ergo, Chemical Splash							
Total number of hours worked—employees	140,982,000		142,465,634		132,184,461		118,509,355	
Non-Employee Workers	#	%	#	%	#	%	#	%
Non-employee worker fatalities	1	0	0	0	0	0	0	0
High-consequence work-related injuries (excluding fatalities)—non-employee workers	0	0	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	16	N/A
Work-related hazards that pose a risk of high-consequence injury	<p>Slip/trip/fall (s/t/f) hazards and repetitive trauma hazards identified through hazard identification and risk assessment. Actions taken to minimize risks include the following:</p> <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, and train and communicate with workers to identify and eliminate s/t/f and repetitive trauma hazards.</li> <li>4. Conduct 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		0	

<sup>1</sup>Employee LTIR and TRIR are Occupational Safety and Health Administration (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

# GLOBAL GIVING AND DOING

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At Western Digital, we care about being there for our communities everywhere we operate. We are committed to expanding inclusion globally, empowering our employees to apply their expertise to inspire the next generation of innovators and help solve global environmental and societal challenges.

Our Global Giving and Doing initiatives focus on three areas: science, technology, engineering, and mathematics (STEM) Education, Hunger Relief and Environmental Preservation. We also work with each Western Digital region to identify important causes within the local context.



#### **STEM Education**

Our goal is to provide increased access to STEM Education to underrepresented and underprivileged youth on a global scale.



#### **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.



#### **Environmental Preservation**

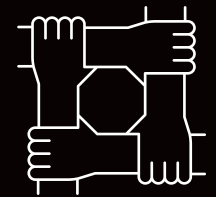
We support nonprofit and nongovernmental (NGO) partners with an environmental focus, including those that provide public education of local and global environmental issues, and supporting relief efforts in times of natural disaster.

# 120



community grants provided to nonprofits to support work in STEM Education, Hunger Relief, Environmental Preservation or Services to Veterans in 2019

# 242



company-sponsored volunteer events, engaging 33 Western Digital sites in 2019



## STEM EDUCATION

### Scholarships

The Western Digital Scholarship Fund offers \$1 million in scholarship opportunities<sup>1</sup> to students seeking to pursue their educational aspirations. In 2019, we awarded 254 scholarships to future scientists, technologists, engineers and mathematicians, as well as the dependents of our talented workforce. We are proud to report 60% of the scholarships were awarded to women.

We support diversity and inclusion in education through three scholarship programs:

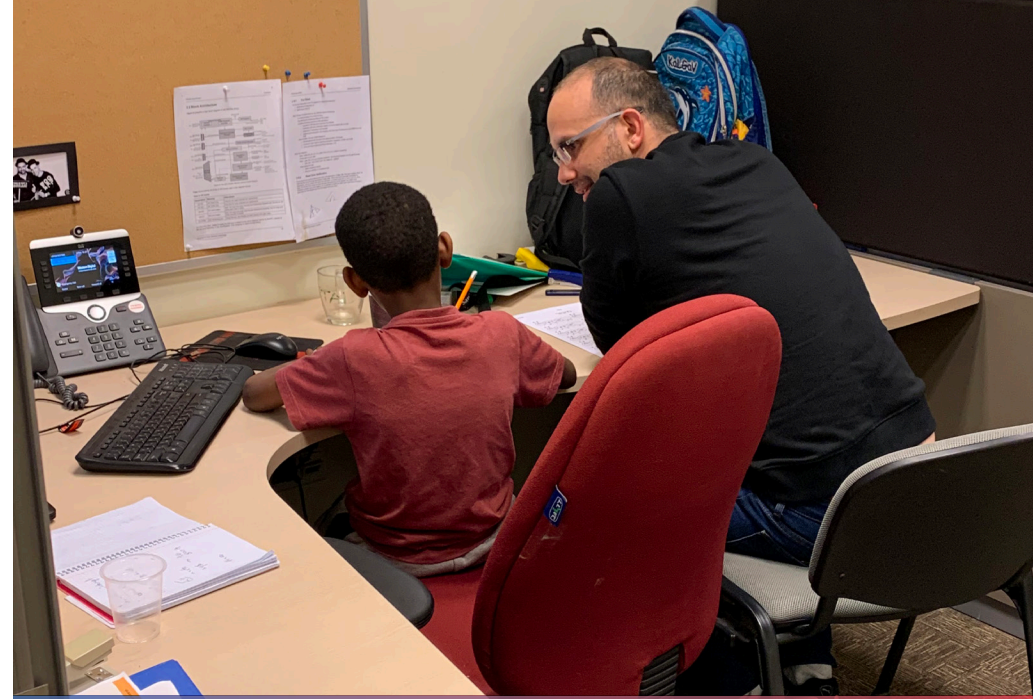
- **Western Digital Scholarships for STEM:** These scholarships were created to address the unmet educational needs of high potential, underprivileged and underrepresented students globally who are pursuing STEM-related undergraduate degrees. These scholarships are available to students in the United 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 Western Digital employees globally.
- **ATIDIM Scholarships in Israel:** Focused on providing support to Ultra-Orthodox Jewish and other underrepresented women in Israel, these scholarships provide financial support for their collegiate level STEM-related studies. Each scholarship recipient is paired in a one-on-one mentoring relationship with a Western Digital female employee to foster both personal growth and academic success.

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

<sup>1</sup>Western Digital's grants and scholarships are provided through the Western Digital Fund, an advised fund of Silicon Valley Community Foundation.

## Mentoring and Building Skills

Western Digital employees work with our partners [Citizens Schools](#) and [Try Engineering Together](#) to serve as mentors to promising STEM students to encourage their learning and discovery. In 2019, we added two new mentoring programs—Mathematics, Engineering & Science Achievement (MESA) in the United States and [Mentor Together](#) in India. MESA is a remote mentoring opportunity that pairs our employees with college students who are preparing to transition to their careers. All students are pursuing a STEM-related degree, making our employees the perfect mentors for the next-generation workforce. We partnered with Mentor Together to pilot their 100% application-based program, Mentor To Go. The program paired our employees with youth from low-income families across India with the goal of helping them become workforce-ready. Overall, 75 Western Digital employees served as mentors to 219 mentees across these four programs.



### HIGHLIGHT STORY

## Kfar Saba Mentoring Program

Students from Kadima Youth Center have been visiting our Kfar Saba office in Israel nearly every week since 2006. The students meet one-on-one with their mentor to receive homework help, career advice and encouragement, play games and learn about technology and business. Some of the mentee/mentor relationships have spanned several years, creating lasting impact on the students' lives. In one special case, a former student, Yakir, has finished school and has started his career at Western Digital.

# 6.4M

meals provided by Western Digital in 2019 throughout the world via our annual Rise Against Hunger Campaign

## HUNGER RELIEF

Throughout the year and around the world, Western Digital takes action to combat hunger. Our employees engage in volunteer events on a regular basis with dozens of local nonprofit and NGO partners with the goal of alleviating hunger in their communities.

Our employees contributed more than 37,000 hours of volunteer time to support hunger relief in 2019. Our volunteer activities also earned grants for our nonprofit and NGO partners addressing hunger. In 2019, our employee's volunteer efforts earned nearly \$275,000 for our global partners.



## HIGHLIGHT STORY

# Annual Rise Against Hunger Campaign

In the fall of each year, we mobilize for our Global Hunger Relief Campaign. In our continued partnership with [Rise Against Hunger](#) and a handful of other partners, we set our sights on providing 6 million meals to the world in 2019. We are proud to report that we exceeded that goal and reached a milestone of 6.4 million meals this year.

## ENVIRONMENTAL PROTECTION

Our giving and volunteer programs care for our planet globally, all year. In 2019, we participated in 40 different environmentally focused volunteer events. Employees spent 7,588 hours restoring trails, waterways, beaches, parks, gardens and forests. Our Environmental Protection efforts provided numerous benefits:

- Planted 682 trees
- Collected 3,717 pounds of waste
- Helped sort more than 1,800 pounds of recyclable materials
- Earned more than \$235,000 in volunteer grants for our environmentally focused nonprofit and NGO partners
- Provided \$116,200 in local community grants for nonprofits across the United States<sup>2</sup>

<sup>2</sup>Western Digital's grants and scholarships are provided through the Western Digital Fund, an advised fund of Silicon Valley Community Foundation.

# 173



volunteer grants provided to nonprofit and NGO partners

## HIGHLIGHT STORY

# bE-Responsible in Bengaluru

Since 2017, Western Digital has partnered with Sahaas to implement the bE-Responsible Program in the communities surrounding our Bangalore office. Through the program, residents are educated about the issue of e-waste and provided with unique solutions to properly dispose of their potentially hazardous e-waste items. To date, the program has enabled the collection and proper disposal of 65 tons of e-waste; provided over 40 public e-waste drop boxes placed conveniently throughout the community; and educated more than 1.1 million citizens about responsible e-waste disposal. The bE-Responsible Program successfully supports one-third of Bengaluru today and, by 2021, will be self-sustaining, requiring only volunteer support to maintain the program.



# INTEGRITY

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We invest strategically in a robust and effective Ethics and Compliance Program that guides our culture of integrity.



# Our Culture of Ethics

## 102-16

Our Chief Compliance Officer oversees the program and has a secondary reporting relationship to the Audit Committee of our Board of Directors, reinforcing independence of the function.

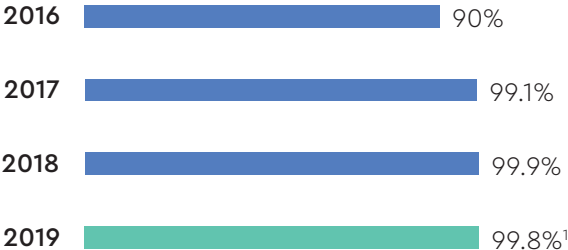
Our [Global Code of Conduct](#) is a unifying guide anchored in our core values. It explains our ethical and legal obligations to each other, as well as our company, business partners, industry and community. We provide a copy of the Code, available in 11 languages, to each Western Digital employee, including those of domestic and foreign subsidiaries. Additionally, our [Code of Business Ethics](#) sets an expectation for directors, officers and employees to demonstrate honest and ethical conduct. Each of us helps safeguard our company's valuable reputation, and we have purposefully set a consistent tone and culture across our more than 60,000 employees globally.

Our Ethics and Compliance Program focuses on strategic risk areas identified during regular risk assessments, including intellectual property, anti-corruption, antitrust, data privacy and trade compliance. We conduct trainings and other initiatives based on those identified risk areas.

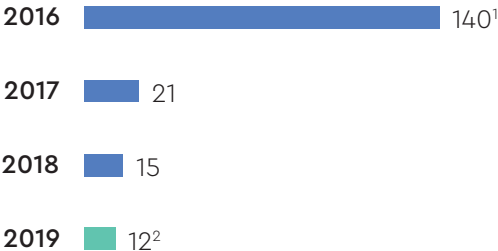
- **Annual Training:** During our annual Compliance Awareness Month, we assign professional and managerial employees mandatory online training covering the importance of our Non-Retaliation Policy, avenues to report concerns and other Global Code of Conduct topics. In 2019, the online training focused on confidential information, data privacy, trade, antitrust and anti-corruption.
- **Ongoing Training:** We provide additional training throughout the year based on risks, requests and/or changes in circumstances. For example, we train people managers every other year on ethical topics relevant to their managerial responsibilities. In 2019, we provided live training on topics including business courtesies, accurate books and records, anti-corruption, trade, market development funds, handling reported concerns, intellectual property and protecting confidential information.
- **Beyond Training:** Western Digital's Audit Committee requires senior members of management and several thousand designated key employees worldwide to complete an annual 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 with this certification process.

## GLOBAL CODE OF CONDUCT TRAINING

### Percent of Training Completed by Month-End Deadline



### Time Required to Reach 100% Training Completion (Days)



<sup>1</sup> Approximation, and includes subsequently terminated employees  
<sup>2</sup> Change in assignment methodology in 2019, resulting in lower number. In 2019, we trained our APAC technician population along with operators rather than through online training.



## RAISING CONCERNS

### 102-17

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 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 through multiple avenues, including our Ethics Helpline.

We promote the Ethics Helpline and our Non-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 approximately 150 languages, 24 hours a day. All concerns raised through the Ethics Helpline can be reported anonymously by anyone who suspects misconduct, 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 investigations staff work with appropriate internal (or external) teams to correct situations of misconduct, administer discipline and prevent future occurrence. The Audit Committee receives regular updates on reports of misconduct including those submitted to the Ethics Helpline. Western Digital does not tolerate retaliation against anyone who reports a possible violation in good faith or assists an investigation.

# Anti-Corruption

## WHY IT MATTERS

### 103-1

As a global company operating across a wide range of geographies, Western Digital is committed to doing business fairly and legally. We hold ourselves and our business partners accountable to the anti-corruption laws of the countries where we operate and to the standards described in the Responsible Business Alliance (RBA) Code of Conduct, our Code of Business Ethics, and our Global Code of Conduct.

## MANAGEMENT APPROACH

### 103-2

Western Digital's anti-corruption team conducts risk assessments and due diligence on a range of activities and business partners. Our risk assessments evaluate where we do business, the type of business we conduct, the risks of corruption in those countries and current circumstances at the time of the assessment (e.g., trade tensions). The assessments also include testing multiple variables, controls and triggering events, allowing us to understand where to properly deploy resources most effectively. If risk assessments identify improvement opportunities, we perform risk mitigation planning and execution to ensure our business addresses key risks. No major deficiencies were identified in any reviews in 2019.

We follow several practices to manage corruption risks in Western Digital's operations:

- 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
- Monitoring our operations continually through internal reviews of our processes and audits of our third parties

Our policies strictly prohibit all forms of bribery and corruption. We review our policies regularly and share them on our intranet. Our policies include a comprehensive Global Anti-Corruption Policy; a Charitable Contributions Policy; and a Global Business Courtesies Policy, which outlines gift, entertainment and other courtesies we may provide or receive. Our anti-corruption commitments are also prominently outlined in our Global Code of Conduct.

In 2019, we invested and launched a new third-party data analytics tool to help automate and expand our due diligence process for business partners. This tool helps improve our diligence efforts through connections to real-time business information. In 2020, we are refining the tool and continuing to expand it to collect and analyze more information. Additionally, we expanded and began training employees of business partners.

## KEY METRICS

### 103-3

We regularly complete comprehensive anti-corruption risk assessments of our global operations. In 2018 and 2019, the enterprise compliance risk assessment included anti-corruption among its topics for review.

### 205-1

Percent of Operations Assessed for Risks Related to Corruption



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

<sup>2</sup> 2018-2019 global risk assessment for all risk areas

# Data Privacy and Security

## WHY IT MATTERS

### 103-1

Western Digital invests in protecting individuals' privacy by helping to secure and respect 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 high standards of internal data management practices.

## MANAGEMENT APPROACH

### 103-2, SASB TC-HW-230a.1

Our comprehensive approach to data management involves two business functions:

**1. Data Security:** Our Operational Risk Advisory Council oversees security broadly throughout the organization. Groups that help manage data security risks in the organization include our Intellectual Property 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.

**2. Data Privacy:** Our Privacy Steering Committee serves as an advisory committee to our Data Privacy Program. Committee members are senior management representing a cross section of the organization, whose responsibilities are adjacent to security and privacy concerns. We have a dedicated team of data privacy experts that manage privacy, including a Data Protection Officer and full-time privacy professionals.

## Policies

Our policies reflect our commitment to help ensure the privacy of our data infrastructure and customers:

- **Global Confidential Information Policy:** Outlines rules for protecting sensitive information generally, including personal information
- **Information Technology Acceptable Use Policy:** Governs how our employees may utilize technology and devices attached to our network
- **Enterprise Cyber Security Policy:** Provides guidance to employees and IT personnel on protecting our infrastructure from cyber-attacks, including a comprehensive incident response plan
- **Privacy Statement:** Provides clear terms for how Western Digital collects, uses and protects personal information and provides customers with a mechanism to raise privacy concerns and exercise any data subject rights such as the right to access, correct or delete personal information

- **Global Privacy Policy:** Describes roles, requirements and best practices to employees for handling personal and sensitive information

We carefully design our policies to comply with privacy laws throughout the world, including the requirements of the EU General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA) and other applicable privacy laws. These policies make clear Western Digital's commitment to collect, use and share personal information based on consent or other legitimate legal purposes. Our Privacy Statement notifies customers how we use data, and we are committed to following laws that may require additional disclosures relating to sharing data with third parties. We do not sell data to third parties and, where a cloud service provider or other third party helps us manage our data, we have procedures in place to ensure that sharing is done lawfully. Third parties that process personal information on our behalf commit to appropriate laws and standards through our contracting process.

Zero reportable  
breaches of personal  
data in 2019

We review our data privacy and security policies regularly and, in 2019, we published the latest version of the [Privacy Statement](#). We are committed to notifying our customers of material changes to our Privacy Statement, and did so with email notifications to our customers in 2019. Beyond the data privacy and security policies discussed above, Western Digital protects sensitive and/or personal data through additional policies and guidelines:

- [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

## Risk Assessment and System Testing

Western Digital conducts regular risk assessments and testing of our systems and procedures. In 2019, Western Digital conducted a companywide compliance risk assessment (which included privacy) and two tabletop exercises to test the company's response to a potential privacy breach. These risk assessments identified several opportunities for improvement for both the security and privacy teams in strategy, systems and efficiency.

## Incident Management

Western Digital's information technology and privacy teams partner to avoid and respond to incidents. With a comprehensive Incident Response Plan, we have defined roles and responsibilities for numerous possible scenarios, such as a privacy incident. The plan includes notification procedures and requirements of data subjects and regulators, where applicable.

In addition to our efforts to protect the information that Western Digital manages or controls, our [Product Security Incident Response Team \(PSIRT\)](#) manages issues relating to possible information breaches in the products we sell. Product-focused work included the following process.



We maintain a public website to provide information and transparency to our customers, and to direct security researchers or others who seek to responsibly disclose vulnerabilities to our [PSIRT@wdc.com](mailto:PSIRT@wdc.com) reporting address.

### Submission Acknowledgment

- Create and forward case to the appropriate engineering team for validation and acceptance.
- Respond to researcher (within three business days).
- Communicate responsible disclosure window to resolve the vulnerability (~90 days).

### Identification and Plan of Action

- Identify root cause, scope of the vulnerability, impact and risk in reported product(s).
- Develop potential remediation options.
- Conduct third-party security audits when appropriate on impacted products or the planned fix to ensure proper remediation.

### Mitigation and Resolution

- Post security bulletin to the product security webpage, explaining the vulnerability, potential user(s) impact and necessary actions to mitigate or resolve the security vulnerability.

We review our data privacy and security policies regularly and, in 2019, we published the latest version of the Privacy Statement.

# Training

Western Digital conducts extensive employee training and communications on data privacy and 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 corporate employees.

All-Employee Training and Communications	
Confidential Information	Online module training in October 2019
2019 Data Privacy Change Management Communication	Enterprise-wide emails and intranet communications including blogs, executive communications, videos, infographics and digital posters
Acceptable Use Policy	Online notice and certification completed in 2019
Targeted Training and Communications	
Privacy Policy and Laws	Targeted training to the Human Resources team in 2019
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)	
<ul style="list-style-type: none"> <li>▪ Tabletop tests of incident response plan</li> <li>▪ Penetration tests</li> <li>▪ Phishing tests</li> </ul>	

### 103-3

Western Digital routinely evaluates our data privacy and security management systems, measuring and testing them on a regular basis. 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 privacy regulation updates and our program readiness. The Privacy Steering Committee also receives reports on the evolving landscape of laws, our privacy operating module, assessment data and reports, and privacy program activities.

## KEY METRICS

### 418-1

Western Digital experienced zero reportable breaches of personal data during the reporting period.

# CONTENT INDICES

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## GRI Content Index

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
General Disclosures			
Organizational profile			
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="#">2019 Annual Report Form 10-K, page 29</a>	
102-5	Ownership and legal form	Publicly traded company under NASDAQ; WDC	
102-6	Markets Served	<a href="#">Western Digital Corporate Website – Solutions – Industries</a>	
102-7	Scale of the organization	<a href="#">2019 Annual Report Form 10-K, page 4, 11, 29, 33</a>	
102-8	Information on employees and other workers	<a href="#">Workforce – Employee Attraction, Retention and Engagement; ESG Data Download</a>	
102-9	Supply chain	<a href="#">Supply Chain</a>	
102-10	Significant changes to the organization and its supply chain	We had no significant changes to our organization or our supply chain in 2019.	
102-11	Precautionary Principle or approach	Western Digital does not currently address the Precautionary Principle.	
102-12	External initiatives	Responsible Minerals Initiative	
102-13	Membership of associations	The Responsible Business Alliance	
Strategy			
102-14	Statement from senior decision-maker	<a href="#">CEO Letter</a>	



GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Ethics and Integrity			
102-16	Values, principles, standards, and norms of behavior	<a href="#">Integrity – Our Culture of Ethics</a>	
102-17	Mechanisms for advice and concerns about ethics	<a href="#">Integrity – Our Culture of Ethics</a>	
Governance			
102-18	Governance structure	<a href="#">Our Business – Governance</a>	
Stakeholder Engagement			
102-40	List of stakeholder groups	<a href="#">Materiality and Stakeholder Engagement</a>	
102-41	Percentage of total employees covered by collective bargaining agreements	2019 Annual Report Form 10-K, page 11	
102-42	Identifying and selecting stakeholders	<a href="#">Materiality and Stakeholder Engagement</a>	
102-43	Approach to stakeholder engagement	<a href="#">Materiality and Stakeholder Engagement</a>	
102-44	Key topics and concerns raised	<a href="#">Materiality and Stakeholder Engagement</a>	
Reporting practices			
102-45	Entities included in the consolidated financial statements	2019 Annual Report Form 10-K, Exhibit 21	
102-46	Defining report content and topic Boundaries	<a href="#">Materiality and Stakeholder Engagement</a>	
102-47	List of material topics	<a href="#">Materiality and Stakeholder Engagement</a>	
102-48	Restatements of information	Historical employee data prior to Western Digital consolidating employee data into one HR system in 2019 is reconciled from a variety of sources. The data consolidation and cleanup has resulted in a revised and restated employee data set for 2017 and 2018. Please see the Employee Attraction, Retention and Engagement section for details.	
102-49	Changes in reporting	<a href="#">Materiality and Stakeholder Engagement</a>	
102-50	Reporting period	Calendar Year 2019	
102-51	Date of most recent report	October 2019	
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="#">Environment – Energy and Emissions; External Verification Report</a>	

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
<b>Economic Topics</b>			
<b>Anti-Corruption</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Integrity – Anti-Corruption; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers	
	103-2 The management approach and its components	Integrity – Anti-Corruption	
	103-3 Evaluation of the management approach	Integrity – Anti-Corruption	
205-1	Operations assessed for risks related to corruption	Integrity – Anti-Corruption; ESG Data Download	
<b>Environmental Topics</b>			
<b>Energy</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Environment – Energy and Emissions; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers	
	103-2 The management approach and its components	Environment – Energy and Emissions	
	103-3 Evaluation of the management approach	Environment – Energy and Emissions	
302-1	Energy consumption within the organization	Environment – Energy and Emissions; ESG Data Download	
302-3	Energy intensity	Environment – Energy and Emissions; ESG Data Download	
302-5	Reductions in energy requirements of products and services	Environment – Product Lifecycle Impacts; ESG Data Download	
<b>Water</b>			
GRI 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	ESG Data Download	
303-3	Water recycled and reused	ESG Data Download	

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Emissions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	<a href="#">Environment – Energy and Emissions;</a> <a href="#">Materiality and Stakeholder Engagement;</a> Boundary – internal, all operations; external, supply chain, contract manufacturers	
	103-2 The management approach and its components	<a href="#">Environment – Energy and Emissions</a>	
	103-3 Evaluation of the management approach	<a href="#">Environment – Energy and Emissions</a>	
1.2	Whether offsets were used	No offsets were used	
305-1	Direct (Scope 1) GHG emissions	<a href="#">Environment – Energy and Emissions; ESG Data Download</a>	
305-2	Energy indirect (Scope 2) GHG emissions	<a href="#">Environment – Energy and Emissions; 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="#">Environment – Product Lifecycle Impacts;</a> <a href="#">ESG Data Download</a>	
Environmental Compliance			
GRI 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="#">Environment – Chemicals and Hazardous Substances</a>	

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Supplier Environmental Assessment			
GRI 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
308-2	Negative environmental impacts in the supply chain and actions taken	<p>Number of suppliers assessed for environmental impacts: 2017: 30; 2018: 65; 2019: 70</p> <p>Number of suppliers identified as having significant actual and potential negative environmental impacts: 2017: 0; 2018: 0; 2019: 0.</p>	<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>

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Social Topics			
Employment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Workforce – Employee Attraction, Retention and Engagement; Materiality and Stakeholder Engagement; Boundary – internal, all operations	
	103-2 The management approach and its components	Workforce – Employee Attraction, Retention and Engagement	
	103-3 Evaluation of the management approach	Workforce – Employee Attraction, Retention and Engagement	
401-1	New employee hires and employee turnover	Workforce – Employee Attraction, Retention and Engagement; ESG Data Download	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Workforce – Employee Attraction, Retention and Engagement	
Training and Education			
GRI 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	Workforce – Employee Attraction, Retention and Engagement	
404-3	Percentage of employees receiving regular performance and career development reviews	Workforce – Employee Attraction, Retention and Engagement	

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Occupational Health and Safety			
GRI 103: Management Approach 2018	103-1 Explanation of the material topic and its Boundaries	Workforce – Health and Safety; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers	
	103-2 The management approach and its components	Workforce – Health and Safety	
	103-3 Evaluation of the management approach	Workforce – Health and Safety	
	403-1 Occupational health and safety management system	Workforce – Health and Safety	
	403-2 Hazard identification, risk assessment, and incident investigation	Workforce – Health and Safety	
	403-3 Occupational health services	Workforce – Health and Safety	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Workforce – Health and Safety	
	403-5 Worker training on occupational health and safety	Workforce – Health and Safety	
	403-6 Promotion of worker health	Workforce – Health and Safety	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Workforce – Health and Safety	
403-8	403-8 Workers covered by an occupational health and safety management system	Workforce – Health and Safety; ESG Data Download	
403-9	403-9 Work-related injuries	Workforce – Health and Safety; ESG Data Download	
Diversity and Equal Opportunity			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Workforce – Diversity and Inclusion; Materiality and Stakeholder Engagement; Boundary – internal, all operations	
	103-2 The management approach and its components	Workforce – Diversity and Inclusion	
	103-3 Evaluation of the management approach	Workforce – Diversity and Inclusion	
405-1	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Workforce – Diversity and Inclusion; ESG Data Download	

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Child Labor			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Supply Chain – Human Rights and Labor Practices; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers, communities of operation	
	103-2 The management approach and its components	Supply Chain – Human Rights and Labor Practices	
	103-3 Evaluation of the management approach	Supply Chain – Human Rights and Labor Practices	
408-1	Operations and suppliers at significant risk for incidents of child labor	Supply Chain – Human Rights and Labor Practices	
Forced or Compulsory Labor			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Supply Chain – Human Rights and Labor Practices; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers, communities of operation	
	103-2 The management approach and its components	Supply Chain – Human Rights and Labor Practices	
	103-3 Evaluation of the management approach	Supply Chain – Human Rights and Labor Practices	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Supply Chain – Human Rights and Labor Practices	
Human Rights Assessment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Supply Chain – Human Rights and Labor Practices; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers, communities of operation	
	103-2 The management approach and its components	Supply Chain – Human Rights and Labor Practices	
	103-3 Evaluation of the management approach	Supply Chain – Human Rights and Labor Practices	
412-1	Operations subject to human rights reviews or human rights impact assessments	Supply Chain – Human Rights and Labor Practices	Western Digital conducts RBA VAP audits, which encompasses potential violations of human rights abuses

GRI Standard	Disclosure Description	Report Location or Direct Answer	Omissions
Supplier Social Assessment			
GRI 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	Supply Chain – Human Rights and Labor Practices; Critical Minerals and Metals	
Customer Privacy			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	Integrity – Data Privacy and Security; Materiality and Stakeholder Engagement; Boundary – internal, all operations; external, supply chain, contract manufacturers, customers, consumers	
	103-2 The management approach and its components	Integrity – Data Privacy and Security	
	103-3 Evaluation of the management approach	Integrity – Data Privacy and Security	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Integrity – Data Privacy and Security	



## SASB Index

SASB Code	Metric	Report Location or Direct Answer
Activity Metrics		
TC-HW-000.A	Number of units produced by product category <ul style="list-style-type: none"> <li>▪ Communications Equipment</li> <li>▪ Components</li> <li>▪ Computer Hardware</li> <li>▪ Computer Peripherals</li> <li>▪ Computer Storage</li> <li>▪ Consumer Electronics</li> <li>▪ Other Hardware</li> <li>▪ Printing &amp; Imaging</li> <li>▪ Transaction Management Systems</li> </ul>	<a href="#">ESG Data Download</a>
TC-HW-000.B	Area of manufacturing facilities (Square feet (ft <sup>2</sup> ))	<a href="#">ESG Data Download</a>
TC-HW-000.C	Percentage of production from owned facilities	<a href="#">ESG Data Download</a>
Accounting Metrics		
TC-HW-230a.1	Description of approach to identifying and addressing data security risks in products	<a href="#">Integrity – Data Privacy and Security</a>
TC-HW-330a.1	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	<a href="#">Workforce – Diversity and Inclusion; ESG Data Download</a>
TC-HW-410a.1	Percentage of products by revenue that contain IEC 62474 declarable substances	<a href="#">Environment – Chemicals and Hazardous Substances; ESG Data Download</a>
TC-HW-410a.2	Percentage of eligible products, by revenue, meeting the requirements for EPEAT registration or equivalent	The vast majority of Western Digital's products do not fall into the specific product categories that would make them eligible for qualification through Green Electronics Council's Electronic Product Environmental Assessment Tool (EPEAT). In fact, prior to 2018, no Western Digital products were eligible for qualification. The few EPEAT eligible products we currently sell do meet many other environmental and regulatory requirements, including EU Ecodesign, which overlap with many EPEAT requirements.
TC-HW-410a.3	Percentage of eligible products, by revenue, meeting ENERGY STAR® criteria	For similar reasons as explained in SASB TC-HW-410a.2, the vast majority of our products are not eligible for ENERGY STAR certification. Several previously eligible products have recently been sold to other companies (e.g., IntelliFlash and ActiveScale).
TC-HW-410a.4	Weight of end-of-life products and e-waste recovered, percentage recycled	<a href="#">Environment – Product Lifecycle Impacts; ESG Data Download</a>
TC-HW-430a.1 & TC-HW-430a.2	Suppliers Assessed Using RBA Validated Assessment Program (VAP)	<a href="#">Supply Chain – Human Rights and Labor Practices; ESG Data Download</a>
TC-HW-440a.1	Description of the management of risks associated with the use of critical materials	<a href="#">Supply Chain – Critical Minerals and Metals</a>

# Western Digital.

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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.

[www.westerndigital.com](http://www.westerndigital.com)

This 2020 Sustainability Report contains forward-looking statements, which are based on our current expectations and are subject to risks and uncertainties that could cause actual results to differ materially from those expressed in these forward-looking statements. Risks and uncertainties that could cause actual results to differ include: the COVID-19 pandemic; the regulatory environment; supply chain disruptions; business conditions; litigation and other legal proceedings; and other risks and uncertainties set forth in our reports filed with the Securities and Exchange Commission, to which your attention is directed. You should not place undue reliance on these forward-looking statements, which speak only as of the date hereof, and we undertake no obligation to update these forward-looking statements to reflect subsequent events or circumstances. Additionally, this report contains metrics that have not been prepared in accordance with U.S. generally accepted accounting principles ("GAAP") and have not been audited. These metrics are not an alternative for metrics prepared in accordance with GAAP and may be different from non-GAAP metrics used by other companies.