

Environmental Sustainability Policy

1. Purpose

WD is committed to minimizing environmental impacts across our global operations, products, and value chain while advancing long-term business resilience and value creation. The purpose of this Environmental Sustainability Policy is to establish comprehensive internal guidance for implementing and executing our environmental strategy, supporting the management of material environmental impacts, risks, and opportunities, and enabling the achievement of established environmental objectives and targets through responsible decision-making, regulatory compliance, and innovation. This policy aligns with WD's Integrated Management System (IMS) Policy where relevant.

2. Scope

This policy applies to all WD operations, including manufacturing sites, offices, and facilities, under an operational control approach. It also extends, where relevant, to employees, suppliers, partners¹, products, and value chain activities.

3. Exclusions or Exceptions

Any exceptions must be reviewed and approved by the Chief Sustainability Officer, and other executive leaders as necessary.

4. Corporate Policy

4.1 WD's environmental sustainability targets

WD has established environmental targets, covering climate, energy, water, waste, and circularity to minimize our environmental footprint.

Topic	WD Target
Climate and energy	
Greenhouse Gas (GHG) emissions – Scope 1 and 2	• Achieve net zero Scope 1 and 2 emissions by FY2032
GHG emissions – Scope 3 (direct materials)	• Reduce direct material emissions by 20% by FY2030 vs FY2024 baseline • Reduce downstream Scope 3 emissions per petabyte during use phase by 50% by FY2030 vs. FY2020 baseline

¹ In this policy, partners can include our indirect customers such as distributors, resellers, retailers, and e-tailers that help sell WD products globally.

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Renewable energy	Operate on 100% carbon-free energy by FY2030
Water	Reduce water withdrawals by 20% by FY2030 vs FY2022
Waste and circularity	- Divert >95% of operational waste from landfills and <5% waste to landfills target by FY2030 - Achieve 43% recycled content in product and 72% recycled content in packaging for enterprise HDDs by FY2030 vs FY2024

4.2 Governance

4.2.1 Regulatory compliance

We comply with applicable environmental and sustainability-related laws, regulations, and requirements in the jurisdictions in which we operate, and to align our practices with relevant sustainability standards and frameworks. We strive to go beyond regulatory requirements in these areas and work to achieve the voluntary sustainability commitments we have set forth for ourselves.

4.2.2 Oversight

We maintain governance over environmental sustainability through the following bodies:

4.2.2.1 Board oversight

Our Board of Directors provides oversight of environmental and climate strategy. Regular updates are provided to the Board through the Governance Committee on environmental priorities and progress toward climate and environmental targets to ensure alignment with WD's corporate strategy.

WD integrates the identification, assessment, and management of climate-related risks into its enterprise risk management (ERM) process, under the oversight of the Audit Committee. The ERM process assigns identified risks to appropriate functional or regional leaders for mitigation and elevates key enterprise risks to the Audit Committee and the Board of Directors. Within this governance framework, management reviews climate-related risks that meet the threshold of key enterprise risks.

Relevant executive management reviews this policy on a regular basis.

4.2.2.2 Management oversight

- Chief Sustainability Officer:** The Chief Sustainability Officer, who reports to the Executive Vice President and Chief of Global Operations, leads the Corporate Sustainability team and works in close collaboration with a cross functional

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Sustainability Council comprised of executive leaders from Global Operations such as Manufacturing, Supply Chain, Quality, Facilities and Environmental Health and Safety to review performance, priorities, and progress and to guide implementation of key environmental initiatives. The Chief Sustainability Officer is considered the most senior level officer directly accountable for implementation of WD's sustainability strategy.

2. **Corporate Sustainability Team:** The Corporate Sustainability Team leads the development and implementation of environmental sustainability programs, oversees the collection and reporting of environmental performance data, and collaborates across the enterprise to advance our environmental objectives and priorities.

4.2.3 Risk management

WD manages environmental risks through our enterprise risk management (ERM) process, overseen by the Board of Directors of our strategic planning and risk management, helping to promote strong governance and long-term organizational success. We evaluate climate risks using scenario analysis aligned with internationally recognized frameworks, and we assess environmental risks related to water, waste, and materials based on operational exposure and geographic context through the Integrated Management System (IMS) process.

4.2.4 Accountability

4.2.4.1 Tracking and monitoring

We monitor environmental performance using defined metrics and key indicators across key environmental topics, including climate and energy, water, waste, circularity, and resource use. Data is collected through established systems and processes and reviewed periodically to assess progress against objectives and targets and published annually in our Annual Sustainability Report.

4.2.4.2 Internal controls, reviews, and audits

We incorporate environmental data, processes, and controls within our operational IMS and conduct periodic internal reviews and management system audits to maintain data integrity, evaluate program effectiveness, and identify corrective and improvement actions across global operations.

4.2.4.3 Third-party verification and assurance

We submit selected environmental data to independent third-party assessment, verification, or assurance in accordance with recognized standards to strengthen confidence in the reliability of reported information and the effectiveness of underlying processes, where appropriate.

4.2.4.4 Continuous improvement

We use insights from monitoring, audits, verification activities, and stakeholder feedback to strengthen controls, improve data quality, and enhance environmental performance over time.

4.2.5 Transparency

WD discloses progress on key environmental topics through public sustainability reporting on an annual basis and regulatory filings where relevant. This policy can be found publicly on our

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corporate website. We aim to be transparent with all stakeholders, including customers, suppliers, partners, and employees on our policies.

4.2.6 Stakeholder engagement and education

We strive to engage with our stakeholders, including but not limited to suppliers, business partners, and employees on these environmental issues to enhance transparency, promote collaboration, and advance WD's environmental commitments and targets.

We support employee awareness and capability through targeted environmental training and education periodically.

4.3 Climate and energy management

4.3.1 Climate

WD seeks to manage greenhouse gas emissions and climate-related risks and opportunities across our operations and value chain to support resilience, regulatory compliance, and long-term value creation while responding to evolving market and stakeholder expectations for low-carbon, energy-efficient products through the following strategies:

4.3.1.1 GHG emissions

3. **Scope 1 emissions:** Maintain an annual emissions inventory across manufacturing facilities and implement a decarbonization strategy that reduces energy and material consumption, substitutes high-global-warming-potential substances with lower-impact alternatives, and applies emissions-control technologies to limit atmospheric releases.
4. **Scope 2 emissions:** Reduce Scope 2 emissions by improving energy efficiency and conservation across manufacturing operations and procuring renewable energy, including on-site renewables, long-term contracts, and utility-based green tariffs.
5. **Scope 3 emissions:** Manage emissions across material upstream and downstream activities by engaging suppliers and building capacity, optimizing logistics and transportation, innovating our product design to enhance energy efficiency and reduce power consumption during use phase, and strengthening recycling and responsible end-of-life management.

4.3.1.2 Climate risks and opportunities

Assess, disclose, and manage climate-related physical and transition risks and opportunities through climate risk assessments and climate scenario analysis aligned with the Taskforce for Climate Related Disclosures (TCFD).

4.3.2 Energy management

We promote a culture of energy efficiency across the organization through the following strategies:

4.3.2.1 Energy conservation, efficiency, and optimization:

1. Drive continuous improvement across operations by leveraging periodic trainings, processes, and technology enhancements – including automation, data analytics, and artificial intelligence where appropriate – to optimize energy use;

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2. Use facility management systems and analytics to monitor and optimize performance; and
3. Deploy energy-saving measures and set site-specific and enterprise level energy objectives aligned with environmental and sustainability goals.

4.3.2.2 Carbon-free energy

We prioritize the purchase of carbon-free energy to power our global manufacturing sites and drive decarbonization progress.

4.4 Water management

WD strives to promote responsible water use and stewardship across our operations and value chain through the following strategies:

4.4.1 Water consumption and conservation:

Improve water efficiency by deploying efficient technologies, preventing leaks, and promoting employee awareness and responsible water-use practices;

4.4.2 Water withdrawal management

Reduce overall water withdrawals by monitoring water use, benchmarking performance against best practices, and setting reduction targets where appropriate;

4.4.3 Water quality and wastewater management

Minimize potential water pollutants and protect receiving water bodies through the following strategies:

4.4.3.1 Seek to treat wastewater onsite using appropriate physical, chemical, and biological processes to meet or exceed applicable discharge requirements prior to release;

4.4.3.2 Prioritize water reuse and recycling to reduce withdrawals and pollutant discharge and implement spill prevention measures;

4.4.3.3 Manage wastewater sludge responsibly through licensed contractors, including metal recovery where feasible, to mitigate against groundwater contamination; and

4.4.3.4 Monitor performance through continuous systems, routine laboratory testing, and internal audits of key water quality parameters to demonstrate sustained regulatory conformance.

4.4.4 Water risk management

Assess and manage water-related risks by developing risk-based contingency plans to enhance resilience against water disruptions and by focusing conservation efforts on operations located in water-stressed or high-risk regions, informed by water vulnerability assessments.

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4.5 Circularity and resource use

WD seeks to advance circularity by strategically managing critical materials, reducing virgin resource use, and designing products and packaging for reuse, recovery, and end-of-life circularity to reduce environmental impacts and strengthen supply-chain resilience through the following strategies:

4.5.1 Critical and strategic raw materials

Identify and manage critical and strategic raw materials² that are essential to product performance, supply chain resilience, and long-term business continuity.

4.5.2 Resource inflow

WD seeks to manage resource inflows by reducing reliance on virgin materials, increasing circular material inputs, and strengthening supply-chain resilience while minimizing environmental impacts across the product lifecycle through the following strategies:

4.5.2.1 Responsible sourcing, traceability, and supplier engagement:

1. Implement responsible sourcing practices that support ethical supply chains, regulatory compliance, and reduced environmental and social risk through our Supplier Code of Conduct and Responsible Minerals Policy;
2. Engage suppliers to improve traceability of raw materials to their origin, assess sustainability risks, and promote transparency through material declarations, compliance documentation, and ongoing monitoring; and
3. Prioritize, where feasible, suppliers that demonstrate adherence to responsible sourcing standards, applicable regulations, and continuous improvement practices;

4.5.2.2 Responsible materials and product design and packaging:

1. Design products and packaging to reduce reliance on virgin materials and increase the use of recycled, responsibly sourced, and verified materials where technically and commercially feasible; and
2. Apply science-based evaluation and rigorous qualification processes to ensure material choices support product performance, reliability, safety, and cost effectiveness while advancing sustainability objectives.

4.5.3 Resource outflow

WD seeks to manage resource outflows by designing products and packaging for circularity, enabling product reuse and end-of-life recovery, and minimizing waste generation across operations through the following strategies:

4.5.3.1 Resource outflow related to products and services:

1. **Sustainable packaging:** Design packaging to protect products, support efficient logistics, and reduce environmental impacts, while seeking to reduce material use,

² Consistent with the objectives of the European Union Critical Raw Materials Act, critical and strategic raw materials include the following a) high-purity rare earth oxides (REOs) such as Neodymium (Nd), Praseodymium (Pr), and Dysprosium (Dy) and b) value-added metals such as Gold (Au), Silver (Ag), Palladium (Pd), Copper (Cu), Aluminum (Al), and steel.

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increase recycled content, and advance recyclable or more sustainable packaging solutions that meet functional and safety requirements;

2. **End-of-life responsibility:** Comply with applicable end-of-life and product stewardship regulations and labeling requirements, including but not limited to [The Waste Electrical and Electronic Equipment \(WEEE\)](#) and French Triman Logo, in the regions where products are sold and incorporate end-of-life considerations into product design and lifecycle planning;
3. **Internal operations and customer returns:** Reduce waste and emissions and support circular reuse through sale and certified replacement programs within our internal manufacturing and return operations; and
4. **End-of-life circularity and critical materials recovery:** Advance responsible end-of-life management by recovering critical materials - including rare earth elements, structural metals, and precious metals - through low-impact, high-yield recycling programs to reintroduce materials into the supply chain and reduce environmental impacts and reliance on geographically concentrated primary extraction.

4.5.3.2 Resource outflow related to waste: See “Waste management” section.

4.6 Waste management

WD seeks to minimize waste generation, reduce environmental and health impacts, and support circular outcomes across operations through responsible waste, chemical, and electronic waste management practices.

4.6.1 Operational waste reduction

We aim to reduce operational waste and enhance landfill diversion across sites by implementing the following strategies:

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- 4.6.1.1** Minimize waste generation through reuse, recycling, composting, and responsible treatment methods;
- 4.6.1.2** Target high landfill diversion rates supported by continuous performance monitoring and improvement;
- 4.6.1.3** Integrate waste management into environmental and operational management systems;
- 4.6.1.4** Assess waste generation and diversion performance, including through audits and third-party verification where appropriate periodically;
- 4.6.1.5** Invest in research, development, and process improvements to reduce waste where feasible;
- 4.6.1.6** Engage qualified waste management and recycling partners to process waste responsibly and support circular outcomes; and
- 4.6.1.7** Provide education and awareness programs that promote responsible waste segregation and reduction and encourage employee participation across sites.

4.6.2 Chemical and hazardous substances management

We are committed to the safe, responsible, and transparent management of chemicals and hazardous substances throughout their lifecycle through the strategies below:

- 4.6.2.1** Implement responsible chemical management practices that address safe storage, handling, use, and disposal;
- 4.6.2.2** Reduce chemical risks by seeking opportunities to eliminate, reduce, phase out, or substitute hazardous substances where technically and commercially feasible;
- 4.6.2.3** Protect worker health and safety by minimizing exposure through controls, training, and oversight; and
- 4.6.2.4** Comply with applicable worldwide environmental regulations and requirements including but not limited to the European Union (EU) Directive on the Restriction of the use of certain Hazardous Substances (RoHS); Taiwan BSMI RoHS, China RoHS, Vietnam RoHS, The European Union's Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH); and The European Union (EU) Waste Framework Directive 2008/98/EC (WFD).

4.6.3 Electronic waste (E-waste) management

We are committed to the responsible handling, recycling, and disposal of electronic waste generated from our facilities and offices through the following strategies:

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- 4.6.3.1** Conduct appropriate due diligence in the selection, onboarding, and oversight of e-waste service providers across global operations; and
- 4.6.3.2** Require e-waste vendors to comply with applicable environmental, health, and safety laws and maintain required permits and licenses, while giving preference, where feasible, to vendors with recognized certifications such as R2, e-Stewards, ISO 14001, or equivalent standards demonstrating environmentally sound e-waste management practices.