



我们的《全球行为准则》

是开展商业行为的一套明确标准。它为我们每天的决策提供了道德和行为框架。

它的指导原则源自我司的核心价值观和信念。

《全球行为准则》中阐述的原则指导着我们所做的一切工作。

首席执行官致辞

尊敬的各位同仁:

西部数据坚信,合乎道德的商业行为是信任的基石。它为我们赢得了客户、主要利益相关者及社区的信任与信心。我们秉持诚信原则行事,从而巩固声誉、建立持久关系,助力公司蓬勃发展。公司不断发展并在全球拓展业务,而始终不变的是我们在开展各项业务时对道德行为准则的坚守。

我们的《全球行为准则》彰显了我们的企业特质,以及我们如何秉持诚信、尊重和负责的态度开展业务。它基于我们的共同价值观构建而成,即客户至上、结果导向、紧密连接、追求卓越以及勇于创新。我建议大家认真阅读该准则,思索其对日常工作的指导意义,并在做决策时参考该准则。

我们的准则绝非空洞言辞,而是对随时随地以正确方式开展业务的坚定承诺。此准则适用于整个组织的每一位成员,让我们都有能力做出契合自身价值观的决策,并在察觉异样时勇敢发声。不管是表达担忧、提出问题,还是报告不当行为,您的意见都至关重要。我们致力于打造一个让每个人都感到安心且备受支持的文化环境。

领导团队和我本人都矢志坚守这些标准,竭力打造一种让道德和透明度成为所有工作的核心的文化。无论我们在何处运营,我们的标准始终如一。我们同属一家公司,因肩负着共同的责任——做正确的事——而紧密相连。

感谢您一如既往地追求卓越、坚守诚信。让我们齐心协力,继续将西部数据建设成一家令我们所 有人都引以为傲的公司。

谨致问候,

Irving Tan,首席执行官

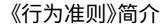
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● 我们的《行为准则》	
《行为准则》简介	2
提出问题和表示疑虑	4
○ 保护我们的工作场所	
相互尊敬和尊重	8
确保工作场所安全	10
保护我们的机密信息	12
尊重他人的知识产权	15
尊重西部数据的财产和资源	18
避免利益冲突	19
披露利益冲突	21
正确使用社交媒体	22
② 坚持我们的商业惯例	
公平对待第三方	24
避免腐败行为	25
与政府官员和政府客户的往来	28
赠予和接受礼品、宴请和娱乐	30
公平竞争	33
遵守全球贸易法规	36
遵守全球隐私法	38

支持我们的股东	
避免内幕交易和泄密 保持准确的账簿和记录 配合内部调查和审计	42 44 48
□ 建设我们的社区	
参加政治和慈善活动 实现环境和社会的可持续发展 处理外部查询	50 52 54
其他实用资源	56

40

避免牵涉到洗钱活动中





我们的《行为准则》

我们的准则既是一套明确的道德标准,也是一份宝贵的参考资料,您应 将其作为指导。

如有问题或疑问,请立即提出,不要犹豫。

我们为什么要有《行为准则》?

在如今复杂的商业环境中, 我们可能 会遇到一些棘手的情况,而它们会影 响到西部数据和您自身。本准则为我 们提供了一套通用的指导原则,帮助 我们做出正确决策。

谁必须遵循本《行为准则》?

我们每个人都有责任了解本准则,以 及适用于我们的工作的公司政策和法

我们希望我们的承包商和其他工作人 员、代理商、经销商、商业合作伙 伴、顾问、被许可人和服务提供商均 同意遵循这些基本原则。此外,所有 供应商都必须遵守我们的《供应商行 为准则》。不遵守任何准则均会受到 纪律处分,情节严重者甚至会被解雇 或解除合同。

如何申请弃权?

如果您想申请豁免本准则的某一条款, 请联系道德与合规部。他们会评估您的 请求,并协助您获得必要的许可。

如果您是公司董事会成员或公司执行 人员,放弃本《行为准则》的规定需要获 得董事会或审计委员会批准, 并可能需 要向 SEC 公开备案。

经理是否负有更多职责?

如果您负责管理员工,那么您必须遵守 更高的标准,并在营造正确的道德文化 方面承担更多责任。经理是领导者,必 须树立起正确的榜样,并营造一个开放 的环境,以便讨论和加强合乎职业道德 的行为以及本准则、公司政策和法律的 执行。以身作则会激发他人遵守职业道 德。

这意味着:

- 通过遵循和讨论我们的《行为准则》,树立积极的榜样。
- 为员工设定关于道德商业行为的要求。
- 让您的团队对遵守本《行为准则》负责。
- 营造优良的环境,让员工可以轻松 提出问题和表达担忧之情,不用害 怕报复。

- 认真对待针对任何潜在不当行为的 举报,并正确处置。
- 当疑问或问题出现时,指导员工参考相应的政策或指导原则。
- 确保员工接受并完成所有必要的道 德与合规培训。
- 表彰道德行为突出的员工。

我只需要了解并遵守本《行为准则》吗?

不是。公司还制定了全球政策和程序。 另外还存在一些地方和部门政策。您还 必须了解和遵守与您岗位工作的相关 法律法规。

若有疑问,请参考公司政策和程序或向 您的经理或公司其他资源寻求指导。

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提出问题和表示疑虑

我如何能做出符合职业道德的最 佳决策?

如果您不确定是否应该采取某种行为, 请问自己以下问题:

- 1. 我会想让我的经理看到我这样做吗?
- 2. 我会向让家人知道我这样做了吗?
- 3. 我会想让我的行为见报或发布到互联网上吗?
- 4. 我是否对我做出的决定感到心安理 得?

如果您对上述任何问题的回答是"否", 那可能就不应该采取行动。如果您不确 定,请咨询经理或其他公司资源。

如果我对公司正在发生的事感到 担忧该怎办?

根据本准则,如果发现异常情况,我们必须大胆指出。我们直言不讳,将问题公之于众,以便公司快速发现和解决问题。

如果您意识到可能存在不道德行为、违 法行为或违反本准则或其他公司政策 的行为,请立即联系您的经理或其他公 司资源。



若有问题或疑问应与谁联系?

在许多情况下,经理可以解答您的问题 或疑问。您可以联系公司的任何资源, 协助您解决困难情况:

- 您可通过道德帮助热线进行匿名 举报, 其提供熟悉各种语言的接线 员,并且全天候无休。联系方式是 www.EthicsHelplineWDC.com 或拨打电话。
- 道德与合规部
- 人力资源部
- 法务部
- 一位可信赖的经理

联系您最熟悉的公司资源。您不需要通 知经理。

大胆指出后会发生什么?

西部数据会认真对待所有道德与合规 问题。我们尽可能将每一个问题视为保 密问题。

我们会尽一切努力对所有提出的问题 进行全面的持续调查。如果调查表明发 生了不当行为,我们会努力纠正问题并 防止其再度发生。

任何违反本《行为准则》或公司政策的 人士都可能受到纪律处分,包括终止雇 佣关系或合同。



我是否会因提出疑虑而遭受打击 报复?

不会。

公司不会容忍对善意举报可能的违规 行为或参与调查的任何人员进行打击 报复。

我们致力于打造无报复的文化。每个人 都应该轻松自如地说出自己的疑问。善 意举报是指您的举报是真诚和诚实的, 无论是否与调查结果相符。

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您随时可以举报任何涉嫌违反本准则、 西部数据政策或法律的行为, 而无需担 心遭受打击报复或任何对您工作不利 的影响。

公司将处罚那些对举报或协助调查的 人士进行报复的人。



保护我们的工作场所

我们互相尊重,保护工作场所安全,尊重知识产权。了解我们在道德方面 保护工作场所的所有方法。

相互尊敬和尊重

营造开放环境,让每个人都能轻松发表 看法和表达担忧,我们才能取得最佳成 果。

尊重多样性和捍卫平等机会

我们拥有广泛的背景、地理和文化。多样性给了帮助我们放宽视野的角度和意见。胸怀大志有助于未来业务取得成功。当我们做出招聘、晋升和薪酬等雇用相关决策时,我们只考虑员工的表现、技能和能力,以及任何法律允许或要求的标准。

我们致力于提供一个没有基于种族、肤色、信仰、宗教、性别、民族血统、婚姻状况、年龄、性取向、性别认同特征或表达、遗传信息、身体或精神残疾、怀孕、医疗状况或适用法律保护的任何基础等因素的歧视和骚扰的工作场所。

我们不会容忍对员工或承包商、求职者 或商业合作伙伴(包括客户和供应商) 员工的歧视或骚扰。

杜绝和举报骚扰

我们不容许出现包括性骚扰在内的任何形式的骚扰。骚扰指令人厌恶的任何口头、目光或肢体行为,致使工作环境充满恐吓、敌意或不友善氛围。我们也不容忍来自供应商、来访者、客户或任何第三方的骚扰。

在城外召开的会议上,Edwin的经理喝醉了,用一种让他非常不舒服的 方式触摸Edwin。经理告诉Edwin,如果他们约会,他会有更好的晋升 机会。Edwin 该怎么办?

Edwin 应向其最信任的资源说出自己的疑虑。这可能是他信任的其他 经理、人力资源或道德帮助热线。Edwin 应该感到安全,因为西部数据 公司禁止 Edwin 的经理或其他人对 Edwin 的举报行为进行报复。

骚扰的例子包括:

- 欺凌、吼叫、大声叫喊或对他人破口 大骂。
- 诽谤性言论、诋毁或"谩骂"。
- 令人讨厌的性示意、性暗示评论、不 当接触或要求(提供)性服务。
- 攻击性言辞、玩笑或与个人特征相 关的图片。

骚扰事件一经发现应立即制止。如果您 经历或目睹骚扰行为,请告知您的经 理、人力资源代表或道德帮助热线。

要了解更多信息,请参阅公司的杜绝 骚扰工作场所政策。

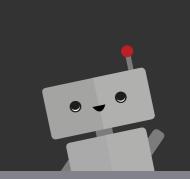
确保工作场所安全

我司制定了有效的安全和健康计划,旨 在防止事故并提高员工的工作效率和 十气。

您必须:

- 了解并遵守现场安全规定。
- 务必使用必要的安全设备。
- 考虑任务的人体工程学要求和重复 运动。
- 立即报告实际或潜在的安全隐患。

请记住: 没有任何工作紧急到或重 要到我们可以忽视安全! 暂停或停 止工作,以识别并减轻潜在危险。



- Wei顶着压力维修一台让生产线停产的重型设备。要安全搬运设备需要两名 员工,但他的同事无法在 30 分钟内赶来帮忙。Wei 认为自己可以搬动该设 备。Wei 该怎么办?
- Wei 应该等同事来帮忙。如果 Wei 试图自己搬动设备,他可能会伤害到自 己,损坏设备。Wei 应该遵守安全规则,即使这意味着生产线必须停工。这些 规定既保护了 Wei, 也保护了西部数据。

防止并举报工作场所暴力。

公司禁止在工作场所或上班期间威胁或实施任何暴力行为。此禁令也适用于与公司相关的业务,以及对任何公司拥有或租赁的车辆或设备的操作。另外,切勿拿工作场所的暴力行为开玩笑。

如果您认为您或他人因为工作场所暴力威胁而面临生命威胁或人身伤害,请尽快离开。离开后,立即向当地警方报警。如果处境安全,通知保安部门、您的经理和人力资源。

如果您对潜在的工作场所暴力有任何 担心,或者有人威胁过您,请通知公司 资源。如果您发现有人可能会给您或其 他人带来危险,您也应该通知公司资 源。适当的资源包括安全部、您的经理 和人力资源部。

避免在工作场所吸毒和酗酒

我们对于在工作场所或开展公司业务时的吸毒和酗酒行为持零容忍政策。我 们禁止在工作场所使用违禁药物。

此外,禁止在工作时酗酒,也不要在任 何药物或处方药的影响下工作,否则会 导致身体损伤。



保护我们的机密信息

在当今竞争激烈的全球市场中,机密信息是我们的一项重要资产。机密信息是指公众无法获取的任何信息。它包括电子文件、纸质文件,甚至您头脑中的知识。保护我们的机密信息关乎西部数据的成败。

机密信息的举例

- 西部数据的研发成果,例如发明、专利申请、工程和实验室笔记。
- 客户、供应商和员工信息。
- 制造工艺和专有技术。

- 商业战略、未发布的产品或服务、市 场营销计划、定价和财务资料。
- 有关产品或服务的信息,包括产品 规范和设计。
- 组织信息,如组织结构图、计划和薪酬。
- 实物,如工程样品和原型。

如果其他公司未经授权得到我们的机 密信息,会让我们在竞争中处于劣势。

防止您所拥有的机密信息不被盗窃、损坏、擅自泄露和不当使用。始终要将此类信息存放于安全之处,并遵循安全使用程序。



除非因为业务需求,否则禁止与任何人 员讨论机密信息。与供应商、客户或其 他商业合作伙伴交往时,切勿泄漏机密 信息,除非签署了保密协议。

切勿在个人云端存储账户或个人存储 设备上存储机密信息,除非该账户或设 备已获批用于处理公司事务。

请勿将机密信息输入或上传至未经批准的信息系统或平台,如外部人工智能聊天机器人、翻译网站和文件转换网站。

依据常识来防止意外泄漏机密信息。

避免在机场、电梯、餐厅和行业相关活动(如贸易展)等场所讨论机密信息。

要了解更多信息,请查看我们的全球机密信息政策。

处理咨询或专家网络机会

其他组织可能会咨询您对他们的看法, 或征询您对技术、存储行业或西部数据 的观点。这听起来可能是一个很好的机 会,但事实并非如此。

参与对您和公司都有风险。您可能感觉 被迫披露一些机密信息。泄露机密信息 会损害我们公司,可能是非法行为。

分享西部数据或商业合作伙伴的内部 信息属于违法行为。

为了避免这些风险,在未通过我们的"合规披露"内网披露潜在利益冲突之前,禁止接受与技术行业、存储行业或西部数据相关的咨询机会(即使您没有获得报酬)。

您也可能需要得到首席财务官和总法 律顾问的批准。

有限除外情况

本《行为准则》不限制或阻碍政府对潜在违法行为展开的调查。根据《保护商业机密法案》和其他适用法律,雇员、独立承包商和顾问对在某些情况下向其律师、法院或政府官员披露机密信息不承担任何责任。

尊重他人的知识产权

如果希望他人尊重我们的机密信息和 知识产权,我们就必须尊重他人的知识 产权。

商业合作伙伴信息

客户、供应商和其他商业合作伙伴有时候出于商业目的向西部数据披露机密信息。

请务必像对待西部数据公司的机密信息一样对待这些信息。

例如,切勿与其他有竞争关系的供应 商,或从事有竞争关系的类似技术工作 的内部团队成员,共享供应商的机密信 息。 道德与合规部和法务部将根据需要帮助围绕某些项目建立知识产权 (IP) 防火墙。

IP防火墙可防止我们在产品和流程中, 在无意间擅自使用商业合作伙伴的机 密信息。

如果您认为您正在从事的项目需要 IP 防火墙,请联系道德与合规部或法务部。

第三方信息

我们不会在未经许可或没有获得合法 权利的情况下,蓄意使用任何第三方知识产权。

如果您被告知或怀疑我们可能侵犯了他人的知识产权,包括专利、版权、商标或商业机密,您应与道德与合规部或法务部联系。

如果您接触到了竞争对手或其他第三 方的潜在机密信息,并且

您不确定我们公司或您的部门是否有 权获取或使用这些信息,请拒绝这些信 息(如果可能),并立即联系道德与合规 部。

未经道德与合规部批准,请勿将信息转 发给任何人。

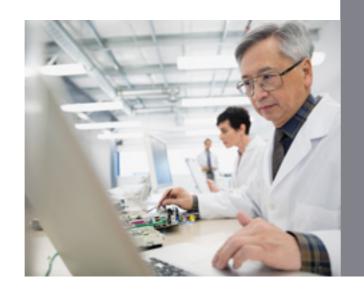
如果有人向您提供非公开的竞争对手 产品或组件,请立即联系道德与合规 部。



Vincent 的同事递给他一个竞争对手的硬盘让他进行测试,还说这是他从朋友那儿拿到的。硬盘上标有"客户测试设备:受保密协议保护;非卖品"。Vincent 是否应该对该硬盘进行测试?



否。Vincent 不应对硬盘进行任何测试或分析。他应该立即联系道德与合规部寻求帮助。该硬盘可能包含竞争对手的商业秘密或其他机密信息。测试或反向工程该硬盘可能会使 Vincent 和公司面临法律责任。



15 | 保护我们的工作场所

开源软件

开源软件是指以免费软件或开源许可方式提供的软件。在使用、修改或销售任何开源软件,以用于西部数据基础设施或者作为西部数据产品或服务开发工作的一部分前,确保您的计划符合公司的开源软件政策。

受版权保护内容

不得在工作中或出于业务目的使用或复制受版权保护的软件、音乐、图像、视频、出版物或其他受版权保护的内容,除非您或西部数据已经获得合法许可。不得使用西部数据的设施或设备制作或存储未经授权的资料。

获取和使用商业情报

我们公司合法收集竞争对手、客户和市 场的信息。

我们不会通过非法或不道德的手段攫 取商业情报。禁止联系竞争对手、商业 合作伙伴、客户或其他第三方,以寻求 获得竞争对手的机密信息。

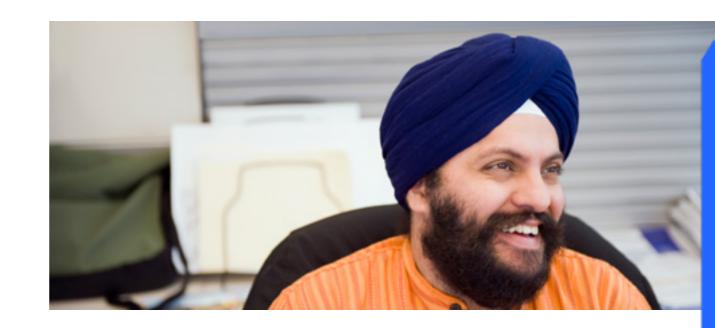
有时信息是意外获得或由未知来源提供的。使用这些信息可能是不道德且违法的行为。在此等情况下,请联系道德与合规部,确定如何继续。

尊重西部数据的财产和资源

提供优质的产品和服务需要谨慎利用 公司资源。我们禁止将公司资源用于个 人利益或不当目的。

公司资源包括设施、车辆、设备、机械、 装置、资金(包括信用卡)、产品、知识产 权和技术。 我们的工作时间也属于公司资源。保护 这些资产免遭盗窃、损坏和滥用。禁止 将公司资源用于成人娱乐,也不要将公 司计算机用于攻击性或色情材料。

了解并理解我们的<u>信息技术可接受使</u> <u>用政策</u>,以及其他与公司资源相关的 本地政策或程序。



避免利益冲突

始终为西部数据公司的最大利益而工 作。当个人利益(关系、交易或其他活 动)影响我们在工作中的决策时,就会 产生利益冲突。即使只是利益冲突的表 象也是有害的。

认真考虑您的行动, 避免利益冲突和导 致利益冲突的情况。一些简单的行为可 能是有问题的, 比如请得到任命或当选 的地方、州或联邦官员共进午餐或晚 餐。

当有疑问时,披露您的关系、交易或活 动。向经理和道德与合规部寻求指导。

如果两名员工是亲戚或密友,则也可能 导致利益冲突。这些关系看上去可能像 是偏袒或优待, 尤其是两人属于上下级 关系时。

不得担任对您的家庭成员或密友具有 决定权的职务, 反之亦然。

如果您是人事经理, 切勿与下属产生亲 密伴侣关系。如果产生这种关系, 应立 即披露。

亲戚或密友是指与您关系牢固,可能会 影响您做出公正决定的人。

这可能包括您的血亲家庭成员或法律 意义上的家人、您的大家族中的成员、 您的配偶或恋人(或其他亲密伴侣关 系)或与您同住的人。

我们无法列出每一种利益冲突情况,但 我们的全球利益冲突政策指出了常见 示例,并说明了相应的披露流程。

Gina最近刚刚入职西部数据公司。她在中国领导着一个工程师团队。 她的公公拥有一家为西部数据的泰国子公司供应原材料的私人公司。 这属于受禁止的利益冲突情形吗? Gina 该怎么办?

Gina应该向她的经理和道德与合规部披露这种关系。她公公拥有的私 人公司是一家商业合作伙伴。道德与合规部将帮助 Gina 避免参与和 其公公的公司相关的决策。如果 Gina 不披露这种关系,可能会导致偏 见或更糟糕的实际不当行为。



披露利益冲突

如果某种关系或行为造成潜在的利益 冲突,必须透明。立即与您的经理讨论, 并通过我们的<u>合规披露</u>内网进行披露。 如果我们及时了解到利益冲突, 我们通常可以给出解决方案。

不披露或隐瞒利益冲突属违反本《行为 准则》的行为。

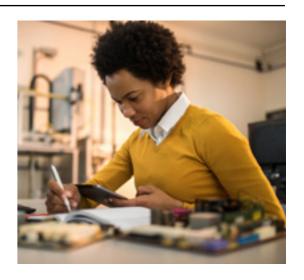
正确使用社交媒体

社交媒体帮助我们联系、交流和分享想法。但这也需要具有良好的判断力。

使用社交媒体时,切勿披露或滥用公司的机密信息或知识产权。

同样,请尊重他人,不得在未经许可的 情况下代表西部数据发言。

阅读并遵循我们的全球社交媒体政策,保护您自己和公司。

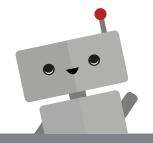


问

Bill 与西部数据的一位供应商有私交。在最近的一次晚餐中,Bill 提到,他的女儿非常适合在这位供应商的公司工作。Bill可以这样做吗?

答

Bill 不应该利用自己与供应商的关系,为女儿谋取不公平的优势。如果Bill 认为他的女儿非常适合这份工作,那么他的女儿应该独立申请该职位,Bill 不应该利用他与供应商的关系来影响招聘决定。Bill 还应该向他的经理和道德与合规部门披露这种情况。



如果您有问题或想提出疑虑,请联系您的经理或人力资源部。

您还可以通过我们在 www.EthicsHelplineWDC.com 的 道德帮助热线联系道德与合规部。



坚持我们的商业惯例

我们有全球责任遵守隐私法和贸易法规,避免腐败活动,公平竞争。请参看我们维护道德商业惯例的所有方式。

公平对待第三方

我们公平对待公司的商业合作伙伴和 竞争对手。禁止非法或不公平地利用我 们商业合作伙伴或竞争对手。

禁止滥用机密信息、歪曲重要事实或进行不公平往来。

公平对待客户

我们对客户作出的承诺意味着真实准确地沟通我们的产品和服务。制作准确、完整的营销材料。以真诚的态度协商合约。

谨慎选择商业合作伙伴

我司严格甄选合作伙伴。进行适当的尽 职调查,谨慎、公平地遴选供应商、承包 商、代理人、顾问和其他商业合作伙伴。 只与符合且执行我们道德行为标准的 合作伙伴开展业务往来。

如果您的角色需要接洽新的商业合作 伙伴,请遵循采购部和法务部门的评估 流程。

确保商业合作伙伴的诚信以及对我们高道德标准的承诺。

如果您有理由认为某个商业合作伙伴 未达到我们的道德标准或无法提供优 质的产品和/或服务,请及时向主管汇 报。

避免腐败行为

西部数据依靠我们产品、服务和员工的 优势赢得业务。腐败对公司和社区有着 深刻的负面影响。我们在任何地方都不 会参与任何形式的腐败。更多信息请阅 读我们的全球反腐败政策。

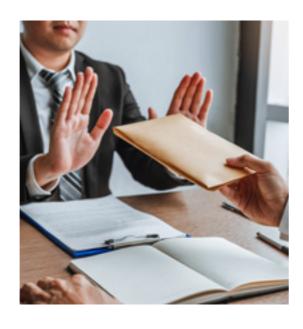
拒绝贿赂

我们的政策很简单:我们不行贿也不受贿。贿赂是指为了不当影响收受者行为而提供的任何有价值的东西。虽然现金支付可能是最常见的贿赂形式,但贿赂可以是任何有价值的东西。

招待、旅游、商品和无形的优惠,如雇用家庭成员、为某人最喜爱的慈善机构捐款或提供度假屋,都可能是贿赂。如果有人提议不正当地影响收受者,这就是贿赂。

贿赂是不道德的,会让您和公司面临刑事起诉、民事罚款和处罚。贿赂也会伤害我们的社区。有些反腐败法关注政府官员的受贿行为。

我们公司承诺公平、透明地开展业务往来。它适用于我们的商业关系,无论我们是与政府官员还是商业合作伙伴交往。我们禁止一切贿赂行为。



我们不索取恩惠或接受回扣

西部数据绝不容忍索取恩惠或收取回 扣。

回扣是指一方给决策者一些有价值的 东西作为补偿或奖励,以获得优惠待遇 或服务。 禁止要求或接受任何有价值的东西来 交换生意。禁止的项目包括金钱、服务 费、佣金、信用、礼物、小费或任何其他 有价值的项目。

如果有商业合作伙伴向您提供任何有价值的东西,试图影响您的决策,拒绝它,并立即通知道德与合规部。

Nadia 接到以前合作过的供应商 Yong 的电话。Yong 感到沮丧,因为一家竞争公司赢得了我们公司的新合同。他认为是因为他们给合同增加了回扣而中标。Nadia 该如何处理该情况?

答 Nadia可以向Yong保证,收取回扣违反我们公司政策。她可以让Yong 向公司的道德帮助热线咨询,提出他关切的问题。Nadia也应向她的经 理或道德与合规部提出这个问题,以待审核。

第三方

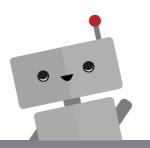
禁止利用第三方为我们行贿。我们只与 从事合法、非腐败商业行为的第三方合 作。

在高风险地区雇用某些类型的第三方 (如分销商、货运代理、物流提供商、顾 问、销售代表、代理商和产品推广人员) 需要获得道德与合规部的事先批准。

要获得预先批准,请遵循<u>反腐败</u>内网中 所述的尽职调查过程。

上报腐败危险信号

如果您看到警告迹象,请立即通知道 德与合规部。如果您怀疑第三方参与 贿赂或其他不当行为,请立即通知道 德与合规部。腐败警告信号包括因 为"关系"、含糊不清的工作说明书 要求与特定的第三方合作,或者雇用 一个不具备工作技能的第三方。请在 我们的全球反腐败政策中查看腐败警 告信号列表。



请记住:不要忽略腐败警告信号。敢于发声就是帮助西部数据和您自己。

与政府官员和政府客户的往来

政府官员包括国有实体的员工,不一定是高级官员。

他们包括以下部门的低级别员工:

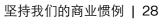
- 任何政府实体(联邦、州或地方)。
- 司法机构。
- 军队。
- 国有或国有控股的私营公司或实 体。
- 国际公共组织。

与政府官员交往

西部数据对与政府官员交往有特定的 要求。比如,向政府官员提供某些类型 的礼品、餐饮和娱乐需要事先获得道德 与合规部的批准。

如果您与政府官员打交道,请了解并 遵循我们的全球反腐败政策和全球商 <u>务礼仪政策</u>。此外,通知道德与合规 部。您将接受额外的培训和指导,以 保护您和西部数据公司。





当与政府客户合作时,请了解相 关信息

如果您与作为潜在客户或当前客户的 政府官员接触,要格外小心,务必遵守 所有适用法律。地方政府通常有特殊的 招标、定价、披露和认证要求。在这些过 程中,我们的诚实和正直至关重要。如 果您对政府业务有任何疑问,请咨询法 务部或道德与合规部。

避免提供疏通费

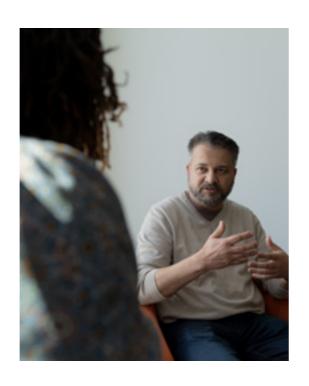
疏通费是指向政府官员直接支付的小额款项,目的是取得或加快取得政府审批的标准,例如处理许可或提供公用事业服务。

禁止支付任何疏通费。如果被要求向政 府官员支付非正式款项,拒绝支付并联 系道德与合规部寻求指导。

应对个人安全威胁和威逼

如果您感到受到威胁,且因此根据自己的判断认为必须支付款项才能避免让自己的生命、健康、安全或自由陷入危险境地的情形,采取必要的措施来保护自己。威胁解除后,您应立即通知您的经理或道德与合规部。

同样,在费用报告中准确记录所有此类付款。



赠予和接受礼品、宴请和娱乐

合理的礼品、宴请、娱乐和商务礼仪可以培养良好的业务关系。但这些招待活动必须是专业和恰当的。我们不想树立一种不得体的形象。

一般而言,如果符合以下所有原则,我们可以提供或接受商务招待:

- 无意影响商业决策或官方行为。
- 没有表现出这种影响。
- 收受人没有直接或间接提出要求。
- 价值不高,而且不是经常赠送。

- 不是现金(或同等)礼物。
- 不是性行为,也不属于不良嗜好。
- 符合所有公司政策和业务政策,例如,公司或当地财务政策。
- 已经获得所有必要的内部批准。
- 当地法律允许。
- 收受人所在公司政策允许。

供应商可以提供礼物、宴请、出游或娱 乐来促进商业关系。为了维护我们的采 购诚信,禁止在采购过程的任何阶段接 受礼物或招待。 同样,禁止接受与西部数据供应商的采 购决策相关的礼物或娱乐。

在我们的政策允许范围内就业务协商 提供的用餐是正常的,也是可以接受

我们的全球商务礼仪政策概述了提供 和接受商务招待的规则和程序。

如果您向第三方提供礼物、娱乐或其他 商务礼仪,请了解并遵守本政策。

如果您不确定礼品或娱乐是否可以接 受,请咨询您的经理或道德与合规部。

礼品与娱乐之间有什么区别?

礼品是收受人认为有价值的任何东西(除了主人参加的餐饮和娱乐活动外)。

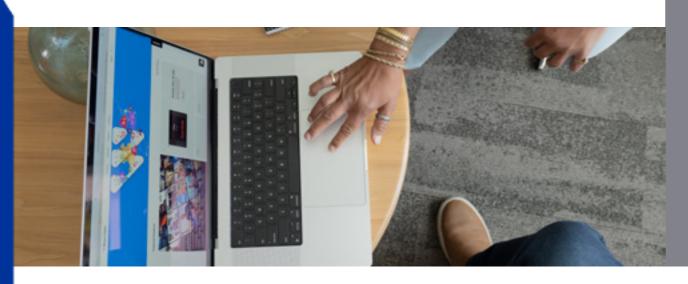
这包括现金、商品、礼券、帮助、服务、使 用度假屋、个人贷款或者以后做某些事 情的承诺。

娱乐包括旅行、酒店住宿、餐饮以及我 们与商业合作伙伴一起参加的文化或 体育赛事。我们将主人不参加的宴请、 体育赛事或其他招待活动视为礼品。



Cindy 最大的客户是个体育迷。Cindy 想庆祝业绩斐然的一年,并 讨论新产品。她计划请客户的团队在一家不错的餐厅吃饭。宴请期 间,Cindy还计划为客户提供某项即将到来的体育赛事的四张前排高 级门票。Cindy 不会参加这一赛事。Cindy 的计划是否得当?

如果餐厅在我们全球商务礼仪政策的范围内,Cindy可以执行其宴请 计划。这些门票被视为礼物,因为Cindy不会参加。因为它们是热门体 育赛事的高级前排门票,所以有可能会超出政策规定的礼品限额。它 们也可能会超过客户根据自己的政策可以接受的礼品限额。Cindy应 该遵循《全球商务礼仪政策》,如果她需要帮助,应该咨询道德与合规 部。





W. Western Digital.

公平竞争

我们公平对待竞争对手,就像我们希望 获得公平待遇一样。虽然我们可将竞争 对手的产品与我们的相比较,但我们并 不对它们进行不公正的诋毁。此外, 当 西部数据雇用曾为竞争对手或其他第 三方工作的员工时,我们不允许该员工 分享其先前雇主的机密信息。

保持竞争

竞争或反垄断法促进公平竞争,让消费 者获益。它们推动创新并获得更好的价 格。这些法律禁止竞争对手之间达成一 些会破坏竞争市场的协议或谅解。

这些法律还规范了占主导地位的公司, 并允许政府干预合并、收购和其他可能 大大减少竞争的交易。

非法反竞争行为的例子:

- 限价:竞争对手之间就对特定产品 或服务的定价达成一致。
- 限制产出:竞争对手同意限制产出, 这通常会导致价格升高。
- 围标: 竞争对手串通投标, 以便使某 个投标人中标。
- 按产品、地域或客户划分或分配市 场: 竞争对手同意限制他们在某个 市场或种类中的销售, 使每家公司 成为某些买家的唯一选择。
- 固定工资: 竞争对手同意为特定员 工或职位支付一定的工资。
- 禁止挖人、禁止劝诱协议: 竞争对手 同意不雇用 (或劝诱) 对方的员工。

如果您在竞争对手处有朋友,或者在您 从事的项目中竞争对手是您的商业合 作伙伴, 要特别小心。在参加贸易活动、 研讨会和行业会议时,您也应该谨慎。

切勿与竞争对手讨论竞争性信息,如定 价、其他销售信息、产出或保密商业计 划。

如果我们的一个竞争对手试图与您讨 论上述任何话题,告诉竞争对手您不会 讨论相关话题。立即离开对话并通知法 务部。

有时候和竞争对手打交道是可以的。例 如,您可以单独与朋友或恰好是竞争对 手的商业合作伙伴接触。

另一方面,通过避免与竞争对手进行不 必要的往来尽量减少不受欢迎的风险。

禁止固定转售价格或阻止竞争对手进 入市场。不要捆绑或不当捆绑产品。不 要抵制顾客或供应商。

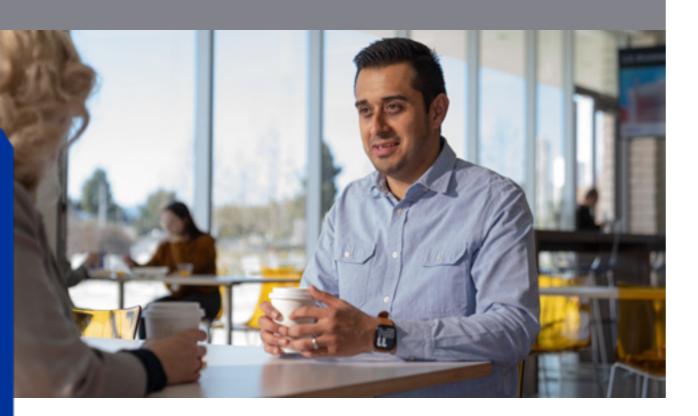
如果您参与了回扣和其他定价计划安 排,确保您已经接受过培训,并遵循法 务部关于正当和不正当竞争方式的建

不得就员工薪酬或雇用行为与竞争对 手达成一致。

如果您发现任何可疑的事件,请立即 报告经理和法务部。要了解更多详 情,请参见我们的全球反垄断政策。

Erik 在一次销售会议上遇见了他的老朋友 Allison。他得知她目前在与本公司相竞争的公司上班。他们都负责相同的销售区域。Allison 建议按相同涨幅提高价格。这样,两家公司都可以在不损失任何客户的情况下赚更多的钱。Erik 该怎么做?

Erik 需要告诉 Allison,他不能和她讨论这个话题,也不会同意。然后他必须立即停止对话。他还应立即联系法务部。若 Erik 与 Allison 之间达成了非正式谅解——甚至包括若 Erik 没能阻止双方间的交谈——均可能遭致竞争法规定的刑事处罚。



遵守全球贸易法规

作为一家全球公司,我们与制定了全球贸易相关法律的国家/地区展开贸易往来。全球贸易法规涵盖产品、软件和技术的销售、运输和支持。违反这些法律可能会损害公司的声誉和地位,导致客户和商业合作伙伴流失。

违反这些法律还可能会损害我们在全 球政府机构中的良好声誉,导致进出口 程序处理延误。违规行为还可能导致罚 款、处罚、失去出口特权或监禁。

全球贸易活动包括:

- 将实物从一个国家/地区运送到另一个国家/地区。
- 将软件(目标代码)从一个国家/地区传输到另一个国家/地区。

- 通过电子邮件、讨论或其他方式,将 技术、知识产权 (IP) 或源代码从一 个国家/地区传输到另一个国家/地 区。
- 通过电子邮件、讨论或其他途径,在 一个国家/地区境内,向其他国家/ 地区的国民传输技术、IP或源代码。
- 雇用外籍员工或合同工,而其可以 接触到公司或第三方的技术、IP 或 源代码。
- 将原型、样品或其他公司资产从一个国家/地区亲身携带到另一个国家/地区。
- 向美国实体清单中的公司,或受到 贸易禁运或制裁的目的地提供支 持,包括技术援助。





筛选商业合作伙伴

根据最终用户和最终用途筛选要求,与 客户、分销商、合约制造商、销售商、供 应商以及其他商业合作伙伴,开展所有 销售、工程、制造、采购和支持活动。

切勿与贸易禁运国家/地区,或受法律 限制的个人或公司开展业务。西部数据 拥有严格的流程来规范我们的发货活 动和筛选商业合作伙伴。如果您与商业 合作伙伴来往,了解并遵循这些流程。

遵守反联合抵制法

我们遵守反联合抵制法。西部数据不会 参与美国法律或适用的当地法律禁止 的任何限制性贸易活动或联合抵制。

您可能遇到要求参与此类联合抵制的 情形。这些要求可能以货运单据、采购 订单、合同或信用证的形式出现。

如果您收到关于支持或参与联合抵制 的要求,请立即联系法务部。

如果您参与任何贸易活动,您需要理解并遵守所有适用贸易法规。

如果您不确定某一项交易或任何其他活动是否合规,请通过 ServiceNow 联系贸 易合规团队寻求指导。要了解更多信息,请查看我们的全球贸易政策。

遵守全球隐私法

我们保护员工、商业合作伙伴、客户和 最终用户的个人信息。

我们在涉及个人信息的所有业务流程 的每一步都考虑隐私问题。

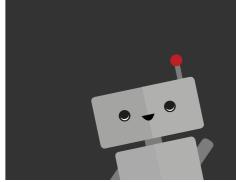
个人信息是指与已识别或可识别个人 有关的任何信息。例如姓名、地址、政府 识别编号和 IP 地址。

其他类型的个人信息可能更加敏感,需 要特殊处理。

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在工作中处理个人信息时:

- 保护,
- 仅访问您需要的内容。
- 与分享我们隐私承诺的商 业合作伙伴合作
- 上报疑虑、威胁和未经授 权的访问。



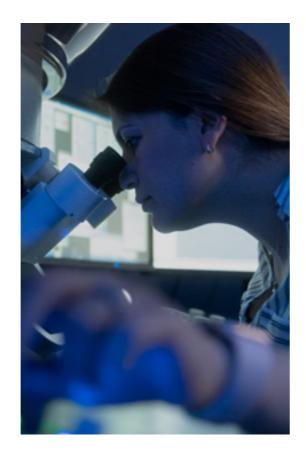




虽然公司尊重隐私,但它也必须按照法律、政策和其他承诺管理员工和商业合作伙伴。

西部数据保留检查公司设施和财产的 权利。这包括但不限于计算机、电话记录、储物柜、电子邮件、文件、商务文件、 办公室和工位。

除非适用法律另行规定,否则员工在使 用西部数据提供的服务、网络、计算机、 智能电话或设备时不应享受隐私保护。 这同样适用于在个人设备上履行工作 职责的情况。



避免牵涉到洗钱活动中

洗钱是指试图隐藏通过非法活动获得 的资金或使资金合法化的行为。

可疑活动的例子包括:要求以现金支付、单笔付款分成多笔办理、使用离岸银行账户,或者使用其他异常付款方式。

洗钱和反恐怖主义问题可能错综复杂。 我们希望通过对商业合作伙伴进行尽 职调查来预防洗钱。

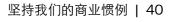
我们还监测它们的活动,并报告任何可 疑活动。如果您遇到任何似乎不太正常 的交易,请联系道德与合规部。

如果您有任何问题或想提出疑问,您的经理是一个优秀的资源。

您也可以联系人力资源部或其他您信任的其他经理。您还可以通过 compliance@wdc.com 或通过我们在 www.EthicsHelplineWDC.com 的 道德帮助热线联系道德与合规部。

要了解更多信息,请查阅我们的全球隐私政策。我们还有一个隐私专家团队负责 提供帮助,包括一名数据保护专员。如有任何问题或疑虑, 请联系 dpo@wdc.com。







支持我们的股东

我们保护机密信息,避免内幕消息和交易,保存准确的账簿和记录,并配 合开展内部调查和审计。了解有关我们如何保护股东价值的更多信息。

避免内幕交易和泄密

在您在西部数据工作期间,您可能获悉 尚未公开的有关西部数据的信息。如果 这种信息属于重大信息,即它可能影响 某人作出买入或卖出公司股票(或其他 证券)的决定,则其应被定性为内幕消

内部信息示例如下:

- 重大合并、收购、要约收购或者换股 合并;
- 重大诉讼:
- 未公开披露的财务业绩或预测。
- 债券发行或其他融资交易。
- 股票发行或回购;
- 重大网络安全事件、数据泄露或类 似事件。

当您知道一家公司的内部信息时, 切勿 买卖该公司的股票或证券(内幕交易)。

同样,不得向可能买卖公司股票或证券 的其他人提供有关公司的内幕消息(建 议)。二者均属于违反法律和本公司政 策的行为。

如果您不确定某些信息是否是内幕信 息,请查看我们的内幕交易政策并向 法务部寻求指导。



Jennifer 工作到很晚,帮助她的公司完成合并。当她回家时,儿子 Thomas 问她为什么工作这么晚。Jennifer 透露了即将展开的合 并。第二天,Thomas 买了他母亲公司的股票。Jennifer 可以告诉

Thomas合并的事情吗? Thomas可以购买Jennifer公司的股票吗?

答 不能。可能合并的消息是投资者认为重要的事情。因此,这些信息既是 重大信息,也是非公开信息。在合并公告前, Jennifer 不得通过散播此 消息的方式来进行泄密。此外,在合并公告前,Jennifer 不得买卖其公 司或参与合并的其他公司的股票。Jennifer和Thomas都可能因违反 内幕交易法而面临刑事责任。

我们所有人都可以获得内部信息,而不 仅仅是高层管理人员。如果您了解公司 的内部信息,请保密。在信息公开后的 至少一个完整交易日之前,禁止买卖公 司的股票或证券。

在您交易或考虑达成涉及我们公司股 票或证券的交易之前,确保您熟悉我 们内幕交易政策的要求和责任。如果 您有任何问题,请咨询法务部或您自 己的法律顾问。

保持准确的账簿和记录

我司的会计账簿和记录必须准确完整。 账簿和记录不准确可能会违反美国和 其他国家的各种法律。

通过我们收集和记录的信息, 我们每个 人都能够促进提高公司账簿和记录的 准确性。例如,我们必须准确地计算工 作时间和所完成的工作

我们还必须在测试结果、费用报告以及 业务成本和收入等方面准确无误。

为确保公司记录的完整性:

• 检查您准备或批准的所有记录是否 准确和完整。

- 不要与商业合作伙伴签订任何非正 式的附带协议(例如口头或无文件 证明的协议)。
- 根据公司的记录保存计划保留记
- 仅根据公司政策授权或法律程序披 露记录。
- 立即报告任何不正确、误导或欺诈 性的记录保存情形。

谨慎处理现金交易

谨慎管理现金。遵循现金和银行账户往 来的适当会计程序。





禁止账外账户

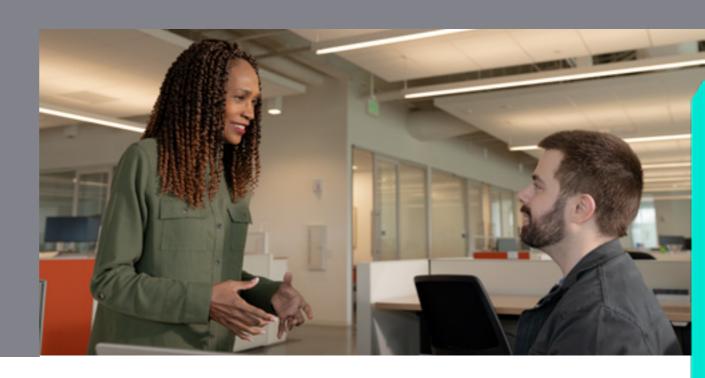
严禁账外交易。它们也被称为"第二账 本"、"贿赂基金"、"饼干罐"或"雨天基 金"。禁止出于任何目的创建未披露或 未记录的基金或资产。

基金的支出是否被跟踪并不重要; 重要 的是必须记录在册。在公司正式账簿和 记录中正确记录所有交易。如果您了解 到任何账外交易,请立即联系道德与合 规部。

Jin 负责更新一些财务文件。遗憾的是,由于他忙于另一个项目,书面文 件已经过期。他刚刚发现他负责的文件正在接受审计。Jin 可以在提交 文件进行审计之前对其进行编辑以确保准确性吗?

不能。未经允许 Jin 不得在审计期间修改文档。如果他认为这些记录没 有准确反映西部数据的财务状况,他应该咨询他的经理。他的经理可以 帮助找到向审计人员如实披露此事的正确方法。今后, Jin 应该更新其 所负责的文件。这样,当他和他的同事需要信息时,他们就能获得准确的 信息。

- Maria 正在和一家营销服务提供商谈判。她在邮件中讨论有关所有 费用按1%提供返款的问题。供应商将留出这笔返款,用于支付西部 数据公司指示的特别营销活动。Maria 已经看到了合同草案,但没有 提到这一返款问题,也没有提到如何偿还给西部数据公司。Maria 知 道这是交易中的一个重要术语,需要让财务部门知道这一点。Maria 应该如何应对这种情况?
- Maria 是正确的,这笔返款需要与财务部门一起进行适当的记录和 审核。否则,这可能既是一个账外账户,也是一个附带协议。玛丽亚需 要和她的团队合作获得财务部和法务部的指导。他们可以帮助恰当 地安排和记录合同中的返款问题。



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禁止达成非书面附加协议

为了确保收入和支出的准确记录和预 测,始终准确和完整地记录我们协议的 所有重要条款。

这包括与客户、供应商和其他商业合作 伙伴订立的协议。

书面合同或采购/销售订单以外的协议 被视为附加协议。附加协议也称为"私 下交易"或"补充条款"。附加协议可以 通过会议或电话交谈口头传达, 也可以 通过电子邮件和信件书面传达。

我们严格禁止达成附加协议,因为它们 规避了既定的财务和其他控制措施。

就涉及公司业务或资源的所有新协议 或对现有协议的修改形成正式文件。让 授权公司代表按照公司政策和程序签 署该等文件。对于预先批准的标准合同 语言以外的其他语言制定的任何条款 或条文,必须获得法务部和财务部的预 先批准。

如果您了解到任何附加协议,请立即联 系法务部。

配合内部调查和审计

完全按照西部数据雇用的内部或外部 审计人员、律师或调查人员所提出的要 求行事。及时向这些人员提供完整和准 确的信息。

不得隐瞒信息。不得试图误导或试图不 当影响任何调查、审计或质询。

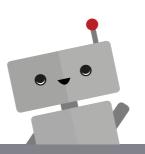
请记住: 西部数据不会容忍对参与审计 或调查的任何人实施报复。

西部数据非常重视政府官员提出的所 有信息要求。

如果您发现政府提出信息要求或政府 开展调查,请立即联系您的经理和法务 部,以便法务部确保西部数据准确适当 地做出响应。

在接到法务部的指示之前禁止回答问 题或提交文档。





如果您有问题或想提出疑虑,请与您信任的经理、道德与合规部 (包括通过 compliance@wdc.com 和我们的道德合规热线 www.EthicsHelplineWDC.com 发送信息)、人力资源部或法务部联系。







参加政治和慈善活动

个人参与

公司不限制您以个人身份参加您自己 选择的政治和慈善活动,但务必遵循以 下两个简单原则:

• 请明确指出您的参与是个人行为, 请勿将其与西部数据联系起来,或 暗示西部数据认可您的行为。

不要利用工作时间或公司资源开展 个人政治活动。

建设我们的社区

我们支持慈善活动,促进环境可持续性,并负责任地进行沟通。了解我们 建立社区的所有方式。



公司参与

未经首席执行官和法务部根据<u>美国政治活动政策</u>事先批准,不得承诺动用公司资金、使用公司名称或设施或其他公司资产,也不得为政治活动提供支持。

"政治活动"是一个宽泛的术语,包括 任何与政治候选人、政党或问题相关的 内容。

它还包括对政治运动或活动的捐赠、主 办政治活动、影响立法,以及其他在美 国境内外的类似活动。 如果您计划将任何西部数据的资金或资源用于慈善活动,请查看并遵循公司资金和资产的慈善捐赠政策以及集团审准要求和委托授权政策。

全球给予和行动部以及/或道德与合规 部要求某些慈善活动获得事先批准。



W. Western Digital.

实现环境和社会的可持续发展

我司通过保护环境、节约资源、支持人 类和社区实现可持续发展。我们不仅遵 守法律,满足客户的期望,而且努力更 进一步,成为可持续发展领域的行业领 导者。无论您承担着怎样的职责,您在 西部数据的可持续发展战略中都扮演 着重要角色。

人权

我司遵守并支持所有人的人权,并且希望我们的员工和商业合作伙伴也能这 样做。

我们适用于全体员工和供应商的<u>全球</u>人权政策解释了这一承诺。它符合国际人权标准。

具体而言, 我们:

- 保持互相尊敬、兼容并包的工作场 所。
- 防止强迫劳动和童工。
- 保持公平、安全的工作环境。
- 遵循负责任的薪酬制度。
- 支持结社和行动自由。

如果您认为我们或我们供应商的做法 有悖于这些价值观,请联系您的经理或 其他合适的公司资源。

能源与排放

减少温室气体排放是我司在可持续发展方面的重点工作之一。

为了完成这项重点工作,我们制定了宏伟的群体目标,包括到2030年100%使用可再生能源,以及到2032年在运营场所实现净零排放。

通过节约用电、大胆创新以减少电力消耗以及寻找机会避免燃料排放(包括避免乘飞机出行),您可以为实现这些目标以及减轻气候变化的恶劣影响贡献力量。

节约资源和废物管理

我们认真负责地节约资源并管理废物。

减少材料(无论是水、纸张还是其他资源)的使用可以降低我们对环境的影响和成本。

妥善管理废物有助于创建清洁的地球和安全的工作场所。请遵守您所在的场所关于安全处置危险废物和隔离其他废物的政策。尽力重复使用或回收利用。

处理外部查询

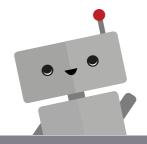
西部数据与公众共享的信息必须准确 且一致。

因此,公司的公关团队负责与媒体沟通。如果有媒体人员与您联系,请将其 转给公关团队而不是自己进行回应。

如果有分析师或投资者与您联系,请将 其转给公司的投资者关系团队。

如果有人要求您代表公司接收诉讼文书,或者执法部门、政府机构或公务人员要求您提供信息,请联系法务部寻求建议。

如果您有任何问题或想提出疑问,您的 经理是一个优秀的资源,人力资源部或 您信任的其他经理也属于不错的资源。



您还可以通过 compliance@wdc.com 或通过我们在 www.EthicsHelplineWDC.com 的道德帮助热线联系道德与合规部。









其他实用资源

查看重要联系人,获得关于具体问题的详细指导,并了解如何联系道德 与合规部。

其他实用资源

具体问题的详细指导

请访问西部数据企业内网上的道德与 <u>合规部分</u>。您将找到深入探讨本准则 所述问题的政策和指南。还有信息图 表、披露表和其他材料可帮助您应对 各种棘手的情况。

联系道德与合规部

发送电子邮件到

compliance@wdc.com。团队个人成 员的联系信息也可以在道德与合规内 部网页面找到。如有关于贸易的疑虑, 请通过 ServiceNow 提交请求。

联系公司的数据保护专员

如有关于数据隐私的问题或疑虑,发送 电子邮件到 dpo@wdc.com。这是公 司数据保护专员的电子邮箱。

报告潜在的道德问题

访问道德帮助热线,网址 www.EthicsHelplineWDC.com。道 德帮助热线提供当地接线员, 可讲我们 开展业务时所用的所有语言。您可以在 道德与合规内网找到您当地的电话号











OUR GLOBAL CODE OF CONDUCT

is a clear set of standards for our business conduct. It provides the ethical and behavioral framework for decisions we make every day.

Its guiding principles come from our core values and beliefs as a company.

In this way, the principles of our Global Code of Conduct guide all that we do.

MESSAGE FROM OUR CEO

Dear Drivers,

At Western Digital, we believe ethical business practices are the foundation of trust. They earn us the trust and confidence of our customers, key stakeholders, and communities. When we act with integrity, we strengthen our reputation and build lasting relationships that help our company thrive. As we continue to grow and operate around the world, the one thing that remains constant is our unwavering commitment to ethical behavior across everything we do.

Our Global Code of Conduct reflects who we are and how we do business with honesty, respect, and accountability. It is built on our shared values: Customers, Results, Connection, Excellence, and Innovation. I encourage you to read the Code carefully, reflect on what it means for your daily work, and use it as a resource to help guide your decisions.

Our code is more than just words - it's a commitment to doing business the right way, everywhere, every day. It applies to everyone across the entire organization and empowers each of us to make decisions that align with our values and to speak up when something doesn't feel right. Whether it's raising a concern, asking a question, or reporting misconduct, your voice matters. We are dedicated to fostering a culture where everyone feels safe and supported.

The leadership team and I are committed to upholding these standards and fostering a culture where ethics and transparency are at the heart of everything we do. No matter where we operate, our standards remain the same. We are one company, united by a shared responsibility to do what's right.

Thank you for your continued dedication to excellence and integrity.

Together, let's continue to build Western Digital into a company we can all be proud of.

Regards,

Irving Tan, CEO

Western Digital.

TABLE OF CONTENTS

(4H)

Our Code of Conduct

Introduction to our Code	2
Asking questions and raising concerns	4



Safeguarding Our Workplace

Treating each other with dignity and respect	8
Keeping our workplace safe	10
Protecting our confidential information	12
Respecting the intellectual property rights of others	15
Respecting the Company's property and resources	18
Avoiding conflicts of interest	19
Disclosing conflicts of interest	21
Using social media appropriately	22



Upholding Our Business Practices

Treating third parties fairly	24
Avoiding corrupt activities	25
nteracting with government officials and government customers	28
Giving and receiving gifts, meals, and entertainment	30
Competing fairly	33
Complying with global trade regulations	36
Complying with global privacy laws	38
Avoiding money laundering situations	40

TABLE OF CONTENTS

Supporting Our Shareholders

Avoiding insider trading and tipping	42
Maintaining accurate books and records	44
Cooperating with internal investigations and audits	48

Building Our Communities

Participating in political and charitable activities 50 52 Achieving environmental and social sustainability Handling external inquiries



W. Western Digital.

Helpful Resources

Additional helpful resources

56



Our Code of Conduct

Our Code is both a clear set of ethics standards and a valuable reference that you should use for guidance. Don't ever hesitate to reach out with a question or concern.

INTRODUCTION TO OUR CODE

Why do we have the Code?

In today's complex business environment, you will encounter difficult situations that could impact our Company and you. This Code provides us with a common set of guidelines to help make the right decisions.

Who must follow the Code?

Each of us is responsible for knowing this Code and the Company policies and laws that apply to our work.

We expect our contractors and other members of our workforce, agents, distributors, business partners, consultants, licensees, and service providers to follow these same principles. In addition, all suppliers must adhere to our Supplier Code of Conduct. Failure to follow either code may have disciplinary consequences up to and including termination of employment or contract.

How do I request a waiver?

If you want to request an exception to a provision of this Code, contact Ethics and Compliance. They will assess your request and assist you in obtaining the necessary permissions.

If you are a member of the Company's Board of Directors or an executive officer of the Company, waiving a provision of this Code requires Board of Director or Audit Committee approval and may require an SEC public filing.

Our Code of Conduct | 2

Do managers have additional responsibilities?

If you manage people, you are held to a higher standard and have additional responsibilities for setting the right ethical culture. Managers are leaders and must set the right tone and create an open environment for discussing and reinforcing ethical behaviors and compliance with this Code, Company policies, and the law. Leading by example inspires ethical behavior in others.

That means:

- Being a positive role model by following and discussing our Code.
- Setting an expectation for your employees to conduct business ethically.
- Holding your team accountable for following our Code.
- Fostering an environment where employees are comfortable asking questions and raising concerns without fear of retaliation.

- Taking reports of potential misconduct seriously and handling them appropriately.
- Directing employees to the appropriate policy or guideline when questions or issues come up.
- Ensuring employees receive and complete all necessary Ethics and Compliance training.
- Recognizing those who exhibit outstanding ethical behavior.

Is the Code all I must know and comply with?

No. The Company also has global policies and procedures. Local and department policies also exist. You must also know and comply with laws and regulations related to your job.

When in doubt, refer to Company policies and procedures or seek guidance from your manager or another Company resource.

ASKING QUESTIONS AND RAISING CONCERNS

How can I make the best ethical decision?

If you aren't sure whether you should take a certain action, ask yourself:

- 1. Would I want my manager to see me take this action?
- 2. Would I want my family to know I took this action?
- 3. Would I want my actions published in a newspaper or posted on the internet?
- 4. Will I feel at peace with my decision?

If you answered "no" to any of those questions, you probably should not take the action. If you're not sure, consult your manager or another Company resource.

What if I have a concern about something going on at the Company?

Our Code requires us to speak up if we see something that doesn't look right. When we speak up, we bring issues to light so the Company can identify and solve problems quickly.

If you're aware of unethical conduct or a violation of law, this Code, or other Company policy, contact your manager or another Company resource right away.



Where do I go with my questions or concerns?

In many cases your manager can respond to your question or concern. You can also contact any of these Company resources to assist you in a difficult situation:

- The Ethics Helpline, which allows anonymous reporting, is available at www.EthicsHelplineWDC.com or by telephone 24 hours a day and has operators who speak all of our languages.
- Ethics and Compliance
- Human Resources
- The Legal Department
- A trusted manager

Contact the Company resource you're most comfortable with. You don't need to inform your manager.

What happens after I speak up?

The Company takes all ethics and compliance concerns seriously. We keep each concern confidential to the extent possible.

We make every effort to investigate all concerns completely and consistently. If our investigation reveals misconduct, we work to correct the situation and prevent it from happening again.

Anyone who violates the Code or Company policy may be disciplined, including termination of employment or contract.

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Will I be punished because I raised a concern?

No.

Our Company does not tolerate retaliation against anyone who, in good faith, raises a possible violation or participates in an investigation.

We're committed to a culture of non-retaliation. Everyone should feel comfortable speaking up about concerns. Speaking up in good faith means your report is sincere and honest, regardless of the outcome of the investigation. You can speak up about suspected violations of this Code, Company policy, or the law without fear of retaliation or negative impact on your employment.

The Company will discipline people who retaliate against someone for making a report or participating in an investigation.



Safeguarding Our Workplace

We treat each other with integrity, keep our workplace safe, and respect intellectual property. Learn about all the ways we ethically safeguard our workplace.

TREATING EACH OTHER WITH DIGNITY AND RESPECT

We achieve our best results in an open environment where we can voice our ideas and concerns.

Embracing diversity and equal opportunity

We have a wide range of backgrounds, geographies, and cultures. Diversity gives us perspectives and ideas that help us think big. Thinking big enables future business success. When we make employment-related decisions such as hiring, promotions, and compensation, we only consider an employee's performance, skills, and abilities, and any legally permitted or required criteria.

We are committed to providing a workplace free of discrimination and harassment based on factors such as race, color, creed, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or

expression, genetic information, physical or mental disability, pregnancy, medical condition, or any basis protected by applicable law.

We will not tolerate discrimination or harassment of employees, contractors, job applicants, or employees of our business partners, including customers and suppliers.

Preventing and reporting harassment

We don't tolerate any form of harassment, including sexual harassment. Harassment is any unwelcome verbal, visual, or physical conduct that creates an intimidating, offensive, or hostile working environment. We also don't tolerate harassment from our suppliers, visitors, customers, or any third party.





At an out-of-town conference, Edwin's manager becomes intoxicated and touches Edwin in a way that makes him very uncomfortable. The manager tells Edwin that he'd have a better chance of promotion if they began dating. What should Edwin do?

Edwin should raise his concern with the resource he feels most comfortable using. That could be another manager he trusts, Human Resources, or the Ethics Helpline. Edwin should feel safe doing so, because Western Digital prohibits retaliation from Edwin's manager or anyone else, for Edwin making this report.

Examples of harassment include:

- Bullying, yelling, shouting, or swearing at others.
- Derogatory references, slurs, or "name calling."
- Unwanted advances, sexually suggestive comments, inappropriate touching, or requests for sexual favors.
- Offensive comments, jokes, or pictures related to personal characteristics.

Incidents of harassment should be stopped immediately. If you experience or witness harassment, tell your manager, a Human Resources representative, or the Ethics Helpline.

For more information, see the Company's Global Anti-Harassment, Anti-Discrimination, and Respectful Workplace Policy.

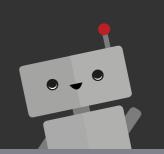
KEEPING OUR WORKPLACE SAFE

Our Company has effective safety and wellness programs to prevent accidents and increase employee productivity and morale.

You must:

- Understand and follow site safety rules.
- Always use necessary safety equipment.
- Consider task ergonomics and repetitive motion.
- Immediately report actual or potential safety hazards.

Remember: Our work is never so urgent or important that we cannot do it safely! Pause or stop work to identify and mitigate potential hazards.

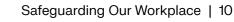


- Wei is under pressure to repair a heavy piece of equipment that is stopping the production line. Moving the equipment safely requires two employees, but his co-worker can't come help for 30 minutes. Wei thinks he can probably lift it by himself. What should Wei do?
- Wei should wait for his co-worker to come help. If Wei tries to do it alone, he could injure himself and damage the equipment. Wei should follow safety rules, even if he must stop the production line. These rules protect both Wei and Western Digital.











Preventing and reporting workplace violence.

The Company prohibits threatening or committing any act of violence in the workplace or while on duty. This prohibition also applies to Company-related business and the operation of any Company-owned or leased vehicle or equipment. Also, never joke about workplace violence.

If you believe that you or others are in immediate life-threatening or physical danger from a threat of workplace violence, make every effort to get out of the area. After you leave the area, contact the local police immediately. Notify Security, your manager, and Human Resources when you are safe.

If you have any concerns about potential workplace violence or if someone has threatened you, notify a Company resource. You should also notify a Company resource if you observe someone who may be putting you or others in danger. Appropriate resources include Security, your manager, and Human Resources.

Avoiding drug and alcohol abuse in the workplace

We have a zero-tolerance policy regarding drug and alcohol abuse on Company property or when conducting Company business. We prohibit illegal drugs in the workplace.

In addition, never work while intoxicated or under the influence of any drugs or prescription medications that cause impairment.



PROTECTING OUR CONFIDENTIAL INFORMATION

In today's highly competitive global marketplace, our confidential information is a key asset.

Confidential information is any information that is not available to the public. It includes electronic files, paper documents, and even knowledge in your head. Protecting our confidential information can mean the difference between success and failure.

Examples of confidential information:

- Company research and development, such as inventions, patent applications, and engineering and lab notebooks.
- Customer, supplier, and employee information.
- Manufacturing processes and know-how.

- Business strategies, unannounced products or services, marketing plans, pricing, and financial data.
- Information about products or services, including product specifications and designs.
- Organizational information, such as org charts, plans, and compensation.
- Physical items, such as engineering samples and prototypes.

We could be put at a competitive disadvantage if others receive our confidential information without authorization.

Protect confidential information in your possession from theft, damage, unauthorized disclosure, and inappropriate use. Always store such information in a safe place and follow security procedures.







Do not discuss confidential information with anyone unless they have a business need to know it. When dealing with a supplier, customer, or other business partner, never disclose confidential information unless a non-disclosure agreement is in place.

Never store confidential information on a personal cloud storage account or personal storage device unless that account or device has been approved for Company use.

Do not enter or upload confidential information to unapproved information systems or platforms, such as external Al chatbots, translation websites, and file conversion websites.

Use common sense to prevent accidental disclosure of confidential information.

Be careful in public places such as airplanes, elevators, restaurants, and industry-related events such as trade shows.

For more information, please see our **Global Confidential Information Policy**.

Handling consulting or expert network opportunities

Other organizations may ask you to consult with them or give your opinion about technology, the storage industry, or our Company. It may sound like a great opportunity, but it's not.

Participating is risky for you and the Company. You may feel pressured to reveal confidential information. Revealing confidential information damages our Company and could be illegal.

Sharing inside information about Western Digital or a business partner is against the law.

To avoid these risks, don't accept a consulting opportunity (even if you are not getting paid) that relates to the technology industry, the

storage industry, or our Company without first disclosing the potential conflict through our Compliance Disclosures intranet space.

You may also be required to get approval from the Chief Financial Officer and the General Counsel.

Limited exception

This Code does not limit or impede government investigations about a potential violation of law. Under the Defend Trade Secrets Act and other applicable laws, employees, independent contractors, and consultants will not be held liable for disclosing confidential information in certain circumstances to their attorney, a court, or a government official.







RESPECTING THE INTELLECTUAL PROPERTY **RIGHTS OF OTHERS**

Just as we expect others to respect our confidential information and intellectual property, we respect the intellectual property rights of others.

Business partner information

Customers, suppliers, and other business partners sometimes disclose confidential information to us for business purposes.

Always treat this information with the same care you use for Western Digital's confidential information.

For example, never share a supplier's confidential information with another competing supplier or with internal team members working on similar, competing technology.

When necessary, Ethics and Compliance and the Legal Department will help establish an intellectual property (IP) Firewall around certain projects.

An IP Firewall prevents us from inadvertently using business partner confidential information without authorization in our products and processes.

Contact Ethics and Compliance or the Legal Department if you think you need an IP Firewall for a project that you're working on.

Third-party information

We do not knowingly use thirdparty intellectual property without permission or legal right.

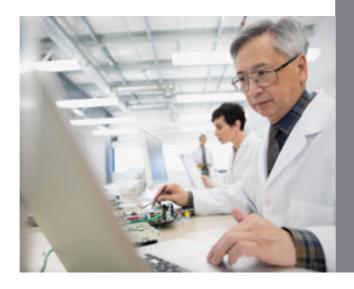
If you're told or suspect that we may be infringing another's intellectual property, including patents, copyrights, trademarks, or trade secrets, contact Ethics and Compliance or the Legal Department.

If you come across information of a competitor or other third party that is potentially confidential and you're uncertain whether our

Company or your division has the right to obtain or use such information, refuse the information (if possible) and immediately contact Ethics and Compliance.

Do not forward the information to anyone without approval from Ethics and Compliance.

If anyone provides you with a non-public competitor product or component, contact Ethics and Compliance immediately.



- Vincent's colleague hands him a competitor's hard drive for testing and says he got it from a friend. The drive is marked "Customer Test Unit: Subject to Non-Disclosure Agreement; Not for Sale." Should Vincent run tests on the drive?
- No. Vincent should not perform any tests or analysis on the drive. He should immediately contact Ethics and Compliance for help. The drive may contain our competitor's trade secrets or other confidential information. Testing or reverse engineering the drive could expose Vincent and the Company to legal liability.







Open source software

Open source software is software offered under a free software or open source license. Before using, modifying, or distributing any open source software for Company infrastructure or as part of a Company product or service development effort, ensure your plan complies with the Company's **Open Source Software Policy.**

Copyright-protected content

Do not use or copy software, music, images, videos, publications, or other copyright-protected content at work or for business purposes unless you or Western Digital are legally permitted to do so. Do not use our Company's facilities or equipment to make or store unauthorized copies.

Obtaining and using business intelligence

Our Company legitimately collects information on competitors. customers, and markets.

We don't acquire business intelligence by illegal or unethical means. Do not contact competitors, business partners, customers, or other third parties to seek competitors' confidential information.

Sometimes information is obtained accidentally or is provided to us by unknown sources. It may be unethical and illegal to use such information. In such circumstances, contact Ethics and Compliance to determine how to proceed.

RESPECTING THE COMPANY'S PROPERTY **AND RESOURCES**

Delivering high-quality products and services requires careful use of Company resources. We prohibit using Company resources for personal gain or inappropriate purposes.

Company resources include facilities, vehicles, equipment, machinery, devices, funds (including credit cards), products, intellectual property, and technology.

Our work time is also a Company resource. Protect these assets from theft, damage, and misuse. Do not use Company resources for adult entertainment, and do not use Company computers for offensive or sexual materials.

Know and understand our **Information Technology Acceptable Use Policy** and other local policies or procedures related to Company resources.







AVOIDING CONFLICTS OF INTEREST

Always work in the best interest of Western Digital. Conflicts of interest arise when a personal interest (a relationship, transaction, or other activity) affects our decision-making at work. Even just the apearance of a conflict of interest can be harmful.

Consider your actions carefully, to avoid conflicts of interest and situations that have the appearance of creating a conflict of interest. A problematic action could be something as simple as taking an appointed or elected local, state, or federal official to lunch or dinner.

When in doubt, disclose your relationship, transaction, or activity. Seek guidance from your manager and Ethics and Compliance.

A conflict of interest may also arise from a family relationship or close friendship between two employees. These relationships—especially if one reports to the other—may look like favoritism or preferential treatment.

Never be in a position where you have decision-making authority over a family member or close friend or vice-versa.

If you are a people manager, do not have an intimate partner relationship with a report. Promptly disclose such a relationship if one develops. A family member or close friend is anyone with whom your relationship is so strong that it could impact your ability to make unbiased decisions.

This could include your biological or legal family, your extended family, your significant other (or other intimate partner relationship), or anyone living in your household.

It's not possible to list every conflict-of-interest scenario, but our Global Conflicts of Interest Policy identifies common examples and describes the process for disclosing them.

- Gina recently joined Western Digital. She leads a team of engineers in China. Her father-in-law owns a private company that supplies raw materials to a Western Digital subsidiary in Thailand. Is this a prohibited conflict of interest? What should Gina do?
- Gina should disclose this relationship to her manager and Ethics and Compliance. The private company her father-in-law owns is a business partner. Ethics and Compliance will work with Gina to help her avoid being part of decisions relating to her father-in-law's company. If Gina doesn't disclose this relationship, it could lead to a perception of bias, or worse, actual misconduct.



DISCLOSING CONFLICTS OF INTEREST

If a relationship or activity poses a potential conflict of interest, be transparent. Promptly discuss it with your manager and submit a disclosure through our **Compliance Disclosures** intranet space.

We can usually resolve conflicts of interest if we learn of them promptly.

Failing to disclose or hiding a conflict of interest is a violation of this Code.

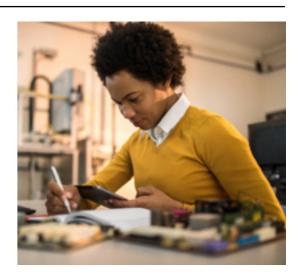
USING SOCIAL MEDIA APPROPRIATELY

Social media helps us connect, communicate, and share ideas. It also requires good judgment and discretion.

When participating in social media, do not disclose or misuse the Company's confidential information or intellectual property.

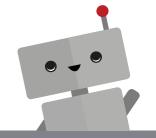
Likewise, act respectfully and do not appear to speak on behalf of Western Digital without permission.

Protect yourself and the Company by reading and following our Global Social Media Policy.



Bill has begun to socialize with a Western Digital supplier outside of the work environment. During a recent dinner, Bill mentions that his daughter would be perfect for a job at the supplier's company. Is this something that Bill should do?

Bill should never use his relationship with a supplier to obtain an unfair advantage for his daughter. If Bill believes his daughter would be perfect for the job, his daughter should apply independently, and Bill should not use his relationship with the supplier to influence the hiring decision. Bill should also disclose the situation to his manager and Ethics and Compliance.



If you have a question or wish to raise a concern, contact your manager or Human Resources.

You can also reach out to Ethics and Compliance or use our Ethics Helpline at www.EthicsHelplineWDC.com



Upholding Our Business Practices

We have a global responsibility to comply with privacy laws and trade regulations, to avoid corrupt activities, and to compete fairly. See all the ways we work to uphold ethical business practices.

TREATING THIRD PARTIES FAIRLY

We deal fairly with our Company's business partners and competitors. Do not take unlawful or unfair advantage of our business partners or competitors.

Do not abuse confidential information, misrepresent material facts, or deal unfairly.

Dealing fairly with customers

Our customer commitment means communicating truthfully and accurately about our products and services. Make marketing materials accurate and complete. Negotiate contracts in good faith.

Choosing our business partners carefully

Our Company selects its partners rigorously. Conduct proper due diligence and choose suppliers, contractors, agents, consultants, and other business partners carefully and fairly.

Only do business with partners who meet and share our high standards of ethical behavior.

If your role requires engaging a new business partner, follow the Procurement and Legal departments' evaluation processes.

Ensure business partner integrity and a commitment to our high ethical standards.

If you believe a business partner does not meet our ethical standards or provides low-quality products or services, let your manager know immediately.





AVOIDING CORRUPT ACTIVITIES

Our Company earns business based upon the merits of our products, services, and people. Corruption has a profoundly negative impact on our Company and communities. We don't engage in any form of corruption, anywhere. Read our **Global Anti-Corruption Policy** for more information.

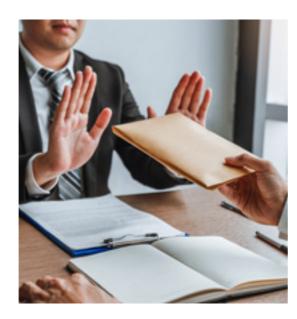
No bribes

Our policy is simple: we don't give or accept bribes. A bribe is anything of value that is given or offered to improperly influence the recipient's actions. While cash payments may be the most common form, a bribe can be anything of value.

Entertainment, travel, goods, and intangible favors like hiring a family member, contributing to someone's favorite charity, or providing access to a vacation home can all be bribes. If it's offered to improperly influence the recipient, it's a bribe.

Bribes are unethical and expose you and the Company to criminal prosecution, civil fines, and penalties. Bribes also harm our community. Some anti-corruption laws focus on bribery of government officials.

Our Company's commitment to doing business fairly and transparently goes further. It applies to our business relationships, whether we are interacting with government officials or our commercial partners. We prohibit all bribery.



We don't request favors or accept kickbacks

Western Digital has zero tolerance for requesting favors or receiving kickbacks.

A kickback occurs when one party gives a decision-maker something of value as compensation or a reward to obtain favorable treatment or services.

Never request or accept anything of value in exchange for business. Off-limits items include money, fees, commissions, credits, gifts, gratuities, or any other items of value.

If a business partner offers you anything of value to try to influence your decision-making, decline it and immediately notify Ethics and Compliance.

- Nadia gets a call from Yong, a supplier she worked with in the past. Yong is upset because a competing company won a new contract with our Company. He thinks they won because they added a kickback to their contract. How should Nadia handle the situation?
- Nadia can assure Yong that kickbacks are against our Company policies. She can refer Yong to the Company's Ethics Helpline to raise his concern. Nadia should also raise the issue with her manager or Ethics and Compliance for review.



Third parties

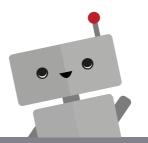
Never use a third party to pay bribes on our behalf. We work only with third parties that engage in legitimate, noncorrupt business practices.

Hiring certain types of third parties (such as distributors, freight forwarders, logistics providers, consultants, sales representatives, agents, and product promoters) in high-risk regions requires pre-approval from Ethics and Compliance.

To obtain pre-approval, follow the due diligence process described on our **Anti-Corruption** intranet space.

Escalate corruption red flags

If you see a warning sign, immediately notify Ethics and Compliance. If you suspect a third party is engaging in bribery or other improper conduct, immediately notify Ethics and Compliance. Corruption red flags include requests to work with a specific third party because of its "connections," vague statements of work, or hiring a third party that doesn't have the skills to perform the job. See a list of corruption red flags in our **Global Anti-Corruption** Policy.



Remember: Do not ignore a corruption red flag. Help the Company and yourself by speaking up.

INTERACTING WITH GOVERNMENT OFFICIALS **AND GOVERNMENT CUSTOMERS**

Government officials include employees of state-owned entities. They don't have to be high-ranking.

They include lower-level employees of:

- Any government entity (federal, state, or local).
- The judiciary.
- The military.
- Private companies or entities that are state-owned or state-controlled.
- Public international organizations.

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Interactions with government officials

Our Company has specific requirements for interacting with government officials. For example, certain types of gifts, meals, and entertainment for government officials require pre-approval by Ethics and Compliance.

If you interact with government officials, know and follow our **Global Anti-Corruption Policy** and our **Global Business Courtesies Policy**. Also, notify Ethics and Compliance. You'll receive additional training and guidance to protect you and the Company.

Remember: Check whether you need pre-approval for gifts, meals, or entertainment from Ethics and Compliance before providing them to government officials.







Be informed when working with government customers

If you engage with government officials as potential or current customers, take extra care to comply with all applicable laws. Often, local governments have special bidding, pricing, disclosure, and certification requirements. Our honesty and integrity throughout those processes are critical. Consult the Legal Department or Ethics and Compliance if you have any questions about government business.

Avoiding facilitation payments

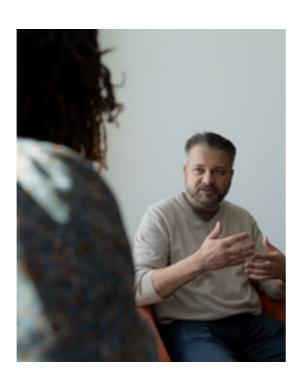
A facilitation payment is a small, unofficial payment made directly to a government official to secure or expedite standard government services, such as processing permits or providing utility services.

Do not make facilitation payments. If asked to make an unofficial payment to a government official, decline and contact Ethics and Compliance to seek guidance.

Handling threats to personal safety and coercion

If you feel threatened and therefore, in your best judgment, believe you must make a payment to avoid putting your life, health, safety, or liberty in jeopardy, take the actions necessary to protect yourself. Once the threat has passed, immediately notify your manager and Ethics and Compliance.

Likewise, accurately record all such payments in your expense report.



GIVING AND RECEIVING GIFTS, MEALS, AND ENTERTAINMENT

Reasonable gifts, meals, entertainment, and other business courtesies can foster a cordial business relationship. However, these courtesies must be professional and appropriate. We don't want to create an appearance of impropriety.

Generally, we may offer or accept a business courtesy if it complies with all of these principles:

- Is not intended to influence a business decision or official act.
- Does not give the appearance of such influence.
- Was not requested, either directly or indirectly, by the recipient.
- Is modest in value and infrequent.

- Is not a cash (or equivalent) gift.
- Is not sexual in nature or otherwise in bad taste.
- Conforms to all corporate and business policies, such as corporate and local finance policies.
- Has received all necessary internal approvals.
- Is permitted by local law.
- Is permitted by the recipient's company policies.

Suppliers may offer gifts, meals, travel, or entertainment to foster a business relationship. To protect our purchasing integrity, do not accept a gift or entertainment during any stage of a procurement process.







Likewise, do not accept a gift or entertainment linked to a procurement decision relating to a Western Digital supplier.

Meals within our Policy limits and which include business discussions are normal and acceptable.

Our Global Business Courtesies **Policy** outlines rules and procedures for offering and accepting business courtesies.

If you provide gifts, entertainment, or other business courtesies to third parties, know and follow this Policy.

If you're unsure if a gift, meal, or entertainment is acceptable. consult with your manager or Ethics and Compliance.

What is the difference between gifts and entertainment?

A gift is anything (other than meals and entertainment attended by the host) that the recipient would consider to be valuable.

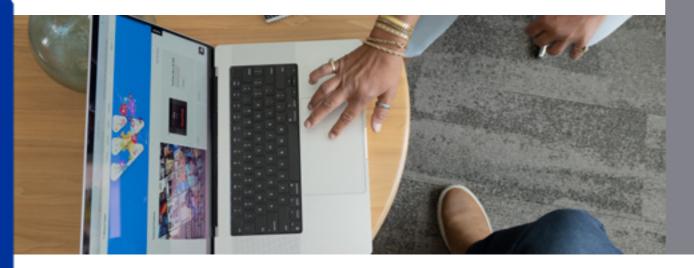
This includes cash, goods, gift certificates, favors, services, use of vacation homes, personal loans, or promises to do something in the future.

Entertainment includes travel, hotel accommodations, meals, and cultural or sporting events that we attend with a business partner. We consider a meal, sporting event, or other courtesy where the host does not attend a gift.



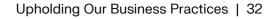
to celebrate a successful year and discuss new products. She plans to treat the customer's team to dinner at a nice restaurant. During the dinner, Cindy also plans to give the customer tickets for four premium, front-row seats at an upcoming sporting event. Cindy won't be attending the event. Are Cindy's plans appropriate?

Cindy's dinner plans are okay if the restaurant is within the limits of our Global Business Courtesies Policy. The tickets are considered a gift since Cindy won't be attending. Since they are for premium, front-row seats to a popular sporting event, they likely are over the gift limit in the Policy. They may also be over what her customer can accept under the customer's own policies. Cindy should follow the Global Business Courtesies Policy and consult with Ethics and Compliance if she needs help.









COMPETING FAIRLY

We treat our competitors fairly, as we want to be treated. While we may compare our competitors' products with our own, we don't unfairly disparage them. Further, when our Company hires an employee who has worked for a competitor or other third party, we don't permit that employee to share confidential information from their previous employer.

Preserving competition

Competition or antitrust laws promote competition for the benefit of consumers. They drive innovation and better pricing. These laws prohibit some agreements or understandings among competitors that would undermine a competitive marketplace.

These laws also regulate dominant companies and allow governments to intervene in mergers, acquisitions, and other transactions that may substantially reduce competition.

Examples of illegal anticompetitive behavior:

- Price fixing: competitors agree to charge a certain price for certain products or services.
- Restricting output: competitors agree to limit output, typically resulting in higher prices.
- Bid rigging: competitors agree to bid so a certain bidder will win.
- Dividing or allocating markets by product, geography, or customer: competitors agree to limit their sales presence in a market or category, so each company is the only available choice for certain buyers.
- Wage fixing: competitors agree to pay a certain wage to particular employees or for certain roles.
- No-poach, non-solicit agreements: competitors agree not to hire (or solicit) each other's employees.

Be particularly cautious if you have friends at a competitor or if you work on projects where a competitor is a business partner. You should also be careful when attending trade events, seminars, and industry conferences.

Never discuss competitive information, such as pricing, other sales information, output, or confidential business plans with our competitors.

If one of our competitors tries to discuss any of these topics with you, tell the competitor you will not discuss the subject. Immediately leave the conversation and notify the Legal Department.

It's sometimes okay to engage with competitors. For example, you can engage with friends on a solely personal basis or with a business partner that happens to be a competitor. On the other hand, minimize unwelcome risk by avoiding unnecessary interaction with competitors.

Do not fix resale prices or prevent competitors from accessing the market. Do not tie or improperly bundle products. Do not boycott customers or suppliers.

If you're involved in structuring rebate and other pricing programs, ensure you've been trained and follow the Legal Department's advice on proper and improper ways to compete.

Do not agree with competitors with respect to employee compensation or hiring practices.

If you become aware of a questionable incident, notify your manager and the Legal Department immediately. For more details, see our **Global Antitrust Policy**.

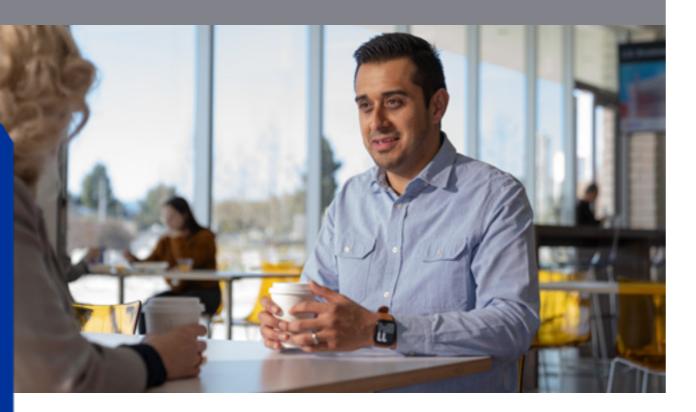






Erik runs into his old friend Allison at a sales conference. He learns that she now works for one of our competitors. They both cover the same sales area. Allison suggests that they raise prices the same amount. That way both companies can make more money without losing any customers. What should Erik do?

A Erik needs to tell Allison that he cannot discuss this topic with her and will not agree. He must then immediately leave the conversation. He should also promptly contact the Legal Department. An informal understanding between Erik and Allison—or even Erik's failure to stop the conversation—could result in a criminal penalty under competition laws.



COMPLYING WITH GLOBAL TRADE REGULATIONS

As a global company, we engage in commerce with countries that have laws related to global trade. Global trade regulations encompass the sale, shipment, and support of products, software, and technology. Failure to comply with these laws could jeopardize the Company's reputation, resulting in loss of customers and business partners.

It could also damage our good standing with global governmental agencies and lead to import and export processing delay. Non-compliance can also lead to monetary fines, penalties, loss of export privileges, or imprisonment.

Global trade activities include:

- Shipping physical goods from one country to another.
- Transmitting software (object code) from one country to another.

- Transmitting technology, intellectual property (IP), or source code from one country to another via email, discussions, or other access.
- Transferring technology, IP, or source code within a country to individuals who are nationals of another country via email discussions, or other access.
- Hiring an employee or contractor who is a foreign national and will have access to Company or third-party technology, IP, or source code.
- Hand-carrying prototypes, samples, or other company assets from one country to another.
- Providing support, including technical assistance, to companies on the United States' entity list or to destinations subject to embargo or sanctions.







Screening our business partners

Conduct all sales, engineering, manufacturing, procurement, and support activities with customers, distributors, contract manufacturers, vendors, suppliers, and other business partners consistent with end-user and end-use screening requirements.

Do not conduct business with **embargoed** countries or with legally restricted individuals or companies. Our Company has robust processes to regulate our shipping activity and to screen our business partners. If you interact with business partners, understand and follow these processes.

Following anti-boycott laws

We comply with anti-boycott laws. Our Company will not cooperate with any restrictive trade practice or boycott prohibited under United States or applicable local laws.

You may encounter requests to participate in these types of boycotts. These requests may be in shipping documents, purchase orders, contracts, or letters of credit.

If you receive a request to support or participate in a boycott, contact the Legal Department immediately.

If you participate in any trade activities, understand and comply with all applicable trade policies.

If you are unsure about a transaction or other activity, contact the Global Trade Compliance team for guidance via **ServiceNow**. For more information, please see our **Global Trade Policy**.

COMPLYING WITH GLOBAL PRIVACY LAWS

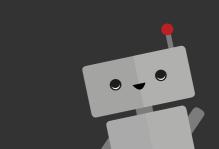
We protect the Personal Information of our workers, business partners, customers, and end users.

We consider privacy at every step of all business processes that involve Personal Information.

Personal Information is any information related to an identified or identifiable person. Examples are names, addresses, government identification numbers, and IP addresses.

Other types of Personal Information may be more sensitive and require special handling. When handling Personal Information in your job:

- Protect it.
- Only access what you need.
- Work with business partners who share our commitment to privacy.
- Escalate concerns, threats, and unauthorized access.







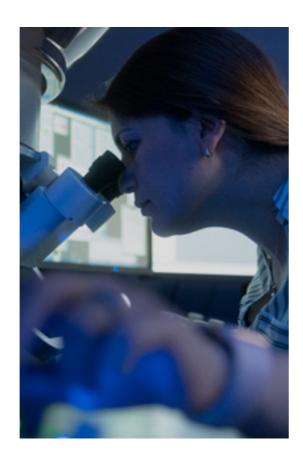




While the Company respects privacy, it must also manage its workforce and business partners in compliance with laws, policies, and other commitments.

Western Digital reserves the right to inspect Company facilities and property. This includes, but is not limited to, computers, telephone records, lockers, emails, files, business documents, offices, and workstations.

Unless otherwise protected by applicable law, do not expect privacy when using Company-provided services, networks, computers, smart phones, or equipment. The same applies when conducting work duties on personal devices.



AVOIDING MONEY LAUNDERING SITUATIONS

Money laundering is an attempt to hide money obtained through illegal activities or an attempt to make that money appear legal.

Examples of suspicious activities include a request to pay in cash, a single payment being split into multiple transactions, using an offshore bank account, and any other unusual payment method.

Money laundering and antiterrorism issues can be complicated. We try to prevent money laundering by conducting due diligence on our business partners.

We also monitor their activities and report any suspicious activities. If you encounter any transaction that doesn't seem right, contact Ethics and Compliance.

For more information, please review our **Global Privacy Policy**. We also have a team of privacy professionals, including a Data Protection Officer, here to help. Contact **dpo@wdc.com** with any questions or concerns.

If you have a question or wish to raise a concern, your manager is an excellent resource.

Human Resources or another manager you trust are also good options.
You can also reach out to Ethics and Compliance at

compliance@wdc.com or through our

Ethics Helpline at www.EthicsHelplineWDC.com.











Supporting Our Shareholders

We protect confidential information, avoid insider tipping and trading, maintain accurate books and records, and cooperate with internal investigations and audits. Learn more about how we guard shareholder value.

AVOIDING INSIDER TRADING AND TIPPING

In your work at Western Digital, you likely have information about our Company that isn't available to the public. If this information is material, meaning that it would likely have an impact on someone's decision to buy or sell stock (or other securities) in the Company, then it's inside information.

Examples that may be inside information:

- A significant merger, acquisition, tender offer, or exchange offer.
- Major litigation.
- Financial results or projections that have not been publicly disclosed.
- Bond offerings or other financing transactions.
- Stock issuance or repurchase.
- A significant cybersecurity incident, data breach, or similar incident.

Never buy or sell a company's stock or securities while you are aware of inside information about that company (insider trading).

Similarly, never provide inside information about a company to others who may buy or sell that company's stock or securities (tipping). Both are illegal and against Company policy.

If you have any questions about whether certain information may be considered inside information, review our **Insider Trading Policy** and seek guidance from the Legal Department.





Jennifer worked late to help her company finalize a merger. When she came home, her son Thomas asked why she was working so late. Jennifer told him about the upcoming merger. The next day, Thomas bought stock in his mother's company. Was it okay for Jennifer to tell Thomas about the merger? Was it okay for Thomas to buy stock in Jennifer's company?

No. News of a possible merger is something that an investor would consider important. Therefore, this information is both material and non-public. Until the merger is publicly announced, Jennifer must not engage in tipping by passing this information along to others. Also, Jennifer must not buy or sell stock in her company or the other company involved in the merger until the merger is publicly announced. Both Jennifer and Thomas could face criminal liability for violating insider trading laws.

All of us can have inside information, not just high-level executives. If you learn inside information about the Company, keep it confidential. Don't trade in the Company's stock or securities until at least one full trading day after the information has been publicly disclosed.

Before you trade or consider entering into a transaction that involves our Company stock or securities, make sure you're familiar with the requirements and your responsibilities under our **Insider Trading Policy.** If you have any questions, ask the Legal Department or your own legal counsel.

MAINTAINING ACCURATE BOOKS AND RECORDS

Our Company's accounting books and records must be accurate and complete. Inaccurate books and records can violate the laws of the United States and other countries.

We each contribute to the accuracy of our Company's books and records through the information we gather and record. For example, we must be accurate in the hours we work and the work we've completed.

We must also be accurate in test results, expense reports, and the costs and revenues for our business, among others.

To ensure the integrity of our Company records:

Check that all records you prepare or approve are accurate and complete.

- Do not make informal side agreements (for example, verbal or undocumented agreements) with business partners.
- Retain records according to our Company's records retention schedule.
- Disclose records only as authorized by Company policy or in response to a legal process.
- Raise any instance of incorrect, misleading, or fraudulent record keeping immediately.

Handle cash transactions carefully

Manage cash with care. Follow appropriate accounting procedures for cash and bank account transactions.





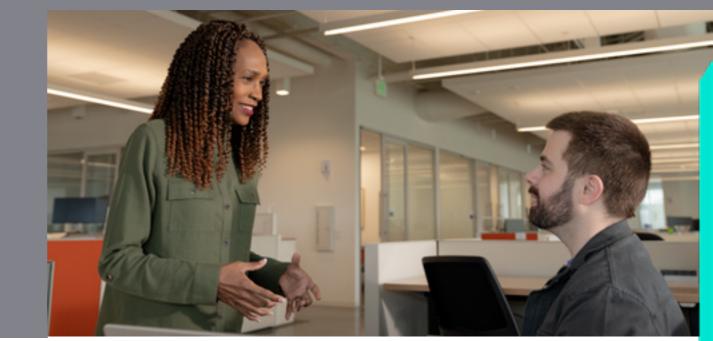
Off-book accounts are prohibited

Off-the-books transactions are strictly prohibited. They are also known as a "second set of books," "slush fund," "cookie jar," or "rainy day fund." Do not create an undisclosed or unrecorded fund or asset for any purpose.

It doesn't matter if expenditures from the fund are tracked; they still must be on the books. Properly record all transactions in our Company's official books and records. If you learn of any off-the-books transactions, contact Ethics and Compliance immediately.

- Jin is responsible for keeping some financial paperwork current. Unfortunately, the paperwork is now out of date because he has been very busy on another project. He just found out that the paperwork he is responsible for is being audited. Can Jin edit the paperwork to make it accurate before turning it in for the audit?
- No. Jin must not alter any documents during an audit without permission. If he thinks that these records do not accurately reflect our Company's finances, he should consult with his manager. His manager can help find the right way to truthfully disclose this to the auditors. In the future, Jin should keep his files properly updated. That way he and his co-workers have accurate information when they need it.

- Maria is negotiating with a marketing service provider. She is included in emails that discuss a 1% rebate on all fees. The supplier will set aside this rebate to pay for ad-hoc marketing activities at Western Digital's direction. Maria has seen the draft contract and there is no mention of this rebate or exactly how it will be repaid to Western Digital. Maria knows this is an important term in the deal and that Finance needs to be made aware. How should Maria respond to the situation?
- Maria is correct that this rebate needs to be appropriately documented and reviewed with Finance. Otherwise, this could be both an off-book account and a side agreement. Maria needs to work with her team to get guidance from Finance and the Legal Department. They can help appropriately structure and document the rebate in the contract.









Undocumented side agreements are prohibited

To ensure accurate records and forecasts of revenues and expenses, always document all material terms of our agreements accurately and completely.

This includes agreements with customers, suppliers, and other business partners.

Agreements outside the written contract or purchase/sales order are considered side agreements. Side agreements are also known as "side deals" or "side letters." Side agreements might be communicated verbally through meetings or phone conversations or in writing through emails and letters.

We strictly prohibit side agreements because they circumvent established financial and other controls.

Formally document all new agreements or modifications to an existing agreement involving Company business or resources. Have an authorized Company representative execute them in accordance with Company policies and procedures. Obtain required Legal and Finance pre-approvals for any terms or clauses outside of standard pre-approved contract language.

If you learn of any side agreements, contact the Legal Department immediately.

COOPERATING WITH INTERNAL INVESTIGATIONS AND AUDITS

Comply fully with the requests of any internal or external auditors, attorneys, or investigators Western Digital has engaged. Provide these individuals with timely, complete, and accurate information.

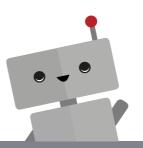
Do not withhold information. Do not attempt to mislead or improperly influence any investigation, audit, or inquiry.

Remember: Our Company does not tolerate retaliation against anyone who participates in an audit or investigation. Western Digital takes seriously all requests for information by government officials.

If you learn of a government request for information or a government investigation, immediately contact your manager and the Legal Department, so the Legal Department can ensure our Company responds accurately and appropriately.

Do not answer questions or produce documents until instructed to do so by the Legal Department.





If you have a question or want to raise a concern, speak with a trusted manager, Ethics and Compliance (including via compliance@wdc.com and our Ethics Helpline at www.EthicsHelplineWDC.com),
Human Resources, or the Legal Department.







PARTICIPATING IN POLITICAL AND CHARITABLE ACTIVITIES

Personal participation

The Company does not limit personal participation in lawful political or charitable activities of your choice, but you must follow these two simple rules:

 Be clear that your participation is personal; do not connect it to Western Digital or otherwise suggest that Western Digital endorses it. Don't use Company time or resources for your personal political activities.

Building Our Communities

We support charitable activities, promote environmental sustainability, and communicate responsibly. Learn about all the ways we build communities.



Company participation

Do not commit Company funds, use of the Company's name or facilities, or other Company assets or provide support for political activities without prior approval from the Chief Executive Officer and Legal Department in accordance with the **U.S. Political Activities Policy**

"Political activities" is a broad term that includes anything related to promoting political candidates, parties, or issues.

It also includes donations to political campaigns or events, hosting of political events, influencing legislation, and other similar activities in or outside of the United States.

If you plan to use any Western Digital funds or resources for a charitable activity, review and follow the **Charitable Donations** of Company Funds and Assets **Policy** and the **Corporate Approval Requirements and Delegation of Authority Policy**

Global Giving & Doing and/or Ethics and Compliance require pre-approval for certain charitable activities.



ACHIEVING ENVIRONMENTAL AND SOCIAL SUSTAINABILITY

Our Company operates sustainably by protecting our environment, conserving resources, and supporting people and communities. We not only abide by the law and meet customer expectations, but we strive to go further and to be an industry leader in sustainability. Whatever your responsibilities, you play an important role in Western Digital's sustainability strategy.

Human rights

Our Company observes and supports the human rights of all individuals, and we expect our employees and our business partners to do the same.

Our Global Human Rights Policy, which applies to our workers and our suppliers, explains that commitment. It aligns with international human rights standards.

Specifically, we:

- Maintain a respectful and inclusive workplace.
- Prevent forced and child labor.
- Maintain fair and safe working conditions.
- Follow responsible pay practices.
- Support freedom of association and movement.

If you believe any of our practices or our suppliers' practices are inconsistent with these values. please contact your manager or another suitable Company resource.



Energy and emissions

Reducing greenhouse gas emissions is one of our Company's highest sustainability priorities.

We have set ambitious public targets to support that priority, including using 100% renewable energy by 2030 and achieving net-zero emissions in our operations by 2032.

You can support those targets and help mitigate the worst effects of climate change—by conserving electricity, innovating to reduce power consumption, and finding opportunities to avoid emissions from fuel (including air travel).

Resource conservation and waste management

We conserve resources and manage waste responsibly.

By reducing material usage, whether water, paper, or any other resource, you can lower both our environmental impact and our costs.

Managing waste properly creates a cleaner planet and a safer workplace. Comply with your site's policies on safely disposing hazardous waste and segregating other waste. Reuse or recycle wherever possible.

HANDLING EXTERNAL INQUIRIES

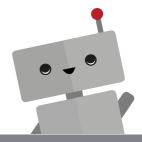
The information our Company shares with the public must be accurate and consistent.

Therefore, the Company's Public Relations team is responsible for communicating with the media. If a member of the media contacts you, forward the request to Public Relations rather than responding vourself.

If an analyst or investor contacts you, please refer them to the Company's Investor Relations team.

Contact the Legal Department for advice if someone asks you to accept service of process on behalf of the Company or if law enforcement, a government agency, or a public official requests information.

If you have a question or wish to raise a concern, your manager is an excellent resource as is Human Resources or another manager you trust.

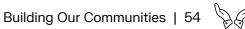


You can also reach out to Ethics and Compliance at compliance@wdc.com or through our Ethics Helpline at www.EthicsHelplineWDC.com.









W. Western Digital.



Additional Helpful Resources

Review important contacts, get detailed guidance on specific issues, and learn how to contact Ethics and Compliance.

ADDITIONAL HELPFUL RESOURCES

Detailed guidance on specific issues

Visit the **Ethics and Compliance space** on the Company intranet. You'll find policies and guidelines that go deeper into the issues covered by this Code. There are also infographics, disclosure forms, and other materials to help you navigate tough situations.

Contact Ethics and Compliance

Send an email to compliance@wdc.com. Contact information for individual team members is also available on the Ethics and Compliance intranet space. For trade concerns, submit a request via **ServiceNow**.

Contact the Company's Data Protection Officer

For data privacy questions or concerns, send an email to dpo@wdc.com. This email address reaches the Company's Data Protection Officer.

Raise a potential ethics concern

Visit the Ethics Helpline at www.EthicsHelplineWDC.com. The Ethics Helpline has local operators available in all the languages in which we do business. You can find your local telephone number on the Ethics and **Compliance** intranet space.







August 2025 ENGLISH