



我們的全球行為規範

是我們業務行為的明確標準。這些規範給予我們日常決策的倫理與行為架構。

其指導準則出於我們公司的核心價值觀 與信念。

透過這個方式,本全球行為規範明訂的準 則是我們所有行為的指引。

執行長的一封信

親愛的推動者們:

在 Western Digital'我們深信道德的商業行為是建立信任的基石。這為我們贏得了客戶、重要利害關係人及社區的信任與信心。當我們秉持誠信行事時,就能提升公司聲譽,並建立長久的關係,推動企業蓬勃發展。隨著我們在全球持續成長並拓展營運,有一件事始終如一,那就是我們對道德行為的堅定承諾,貫徹於我們所做的一切。

我們的全球行為規範展現了我們的本質,也體現我們以誠信、尊重與負責任的方式來開展業務。它建立在我們共同的核心價值之上:以客為尊、成果導向、強化連結、追求卓越與創新精神。我鼓勵各位仔細閱讀這份行為規範,思考其對日常工作的意義,並將其做為引導決策的重要依據。

我們的行為規範不僅僅是紙上文字,而是我們始終如一的承諾,在全球各地,每一天都堅持以正確的方式做事。它適用於整個組織中的每位同仁,並賦予我們每個人自主決策的力量,使我們能夠依循價值觀行事,並在察覺有任何不妥時勇於發聲。無論是提出疑慮、詢問問題,還是通報不當行為,您的聲音都很重要。我們致力於營造一種文化,讓每位同仁都能感到安心且備受支持。

領導團隊與我本人皆致力秉持這些標準,打造一個以道德與透明為核心的企業文化。無論我們在何處開展業務,這些標準始終如一。我們是一個整體,共同局負起正確行事的責任。

感謝各位持續展現卓越與誠信精神。讓我們攜手持續打造一個令所有人都引以為傲的 Western Digital。

順頌,

執行長 Irving Tan

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防範洗錢行為



我們的行為規範

我們規範包含明確的倫理標準,是我們應該用來做為指引的寶貴參考資料。

如有問題或疑慮,請立即尋求協助,千萬不要遲疑。

我們的行為規範簡介

我們為何需要本行為規範?

在現今複雜的商業環境中,您將面臨各種會影響公司和您個人的困難情況。本行為規範旨在為我們提供一般性的指引,幫助我們做出正確的決定。

哪些人必須遵循本行為規範?

我們每個人都有責任瞭解本規範,以及工作上適用的公司政策和法律。

此外,我們也期望我們的承包商和其他 我們的員工團隊、臨時工作人員、代理 商、經銷商、商務夥伴、顧問、被授權商, 以及服務供應商都能遵循相同的準則。 此外,所有供應商必須遵守我們的供應 商行為規範。違反任一份規範即可能受 到紀律處分,嚴重者可予以解雇或解 約。

如何提出豁免要求?

如您希望提出不受制於本規範規定的要求,請聯繫倫理與法規遵循部門。他們會評估您的要求,並協助您取得必要的許可。

如您是公司董事會成員之一或公司高階主管,豁免於本規範規定需要董事會或審計委員會的核准,並且可能需要SEC公開呈報。

經理是否負有額外的責任?

如您管理人員,就會被要求遵守更高的 標準,此外,還需擔負建立正確道德文 化的責任。經理是領導者,因此必須建 立正確的基調,並打造開放環境,來討 論與強化倫理行為,以及遵循本規範、 公司政策與法律。以身做則可激發他人 的倫理行為。

這表示:

- 遵守與討論我們的規範,成為正面 的楷模。
- 為您的員工訂下秉持倫理精神執行 業務的期望。
- 讓您的團隊負起遵守本規範的責 任。
- 營造一個讓員工放心提問及表達疑 慮,而不必擔心遭報復的環境

- 認真對待潛在違規情事的通報,並 加以妥善處理。
- 當員工提出疑問或遇到問題時,可 提供正確的政策或指引
- 確保員工受到並完成所有必要的倫 理與法規遵循訓練
- 肯定員工傑出的倫理行為表現

我只需瞭解並遵循本行為規範就 可以了嗎?

否。還有公司的全球政策和程序,以及 當地與部門的政策。此外,您也必須瞭 解並遵守與工作相關的法律與法規。

如有任何疑問,請參閱公司政策和程 序,或是向您的經理或其他公司資源尋 求指引。

提問及表達疑慮

我要如何做出最佳的倫理決策?

如果您不確定該怎麼做,請自問以下問 題:

- 1. 我是否想要讓我的主管看到我採取 此行動?
- 2. 我是否想要讓我的家人知道我採取 此行動?
- 3. 我是否想要讓我的行為公諸於新聞 媒體或網路?
- 4. 我在採取此行動時是否心安理得?

如果以上有任何問題的答案是「否」,那 麼您可能就不應採取該行為。如您不確 定,請向您的經理或其他公司資源諮 詢。

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如果我擔心公司內部有事情發生 時,該怎麼辦?

看到有問題的事情時,我們的行為規範 要求我們勇於發聲。當我們勇於發聲, 讓問題浮現,公司才能快速找出問題並 加以解決。

如您發現違反倫理或違反法律、本規範 或其他公司政策的行為,請立即聯繫您 的經理或其他公司資源。



我可以從哪裡提問或表達疑慮?

在許多情況下,您的經理能夠回應您的 問題或疑慮。您亦可聯繫下列任何公司 資源協助您處理困難的情況:

倫理服務專區,您可匿名舉報,且舉 報管道包含

www.EthicsHelplineWDC.com 網站,或 24 小時電話舉報,由可說 所有語言的專員提供服務。

- 倫理與法規遵循部門
- 人力資源
- 法務部門
- 信任的主管

聯繫您覺得最自在的公司資源。您無需 告知您的經理。

我勇敢發聲之後會發生哪些情況?

本公司非常認真看待所有倫理與法規 相關疑慮。所有疑慮我們都會盡可能確 保其機密性。

我們始終傾全力徹底調查所有疑慮。若 調查結果顯示違規情事屬實,我們將竭 力更正該等情事以防止相同情況再次 發生。

任何違反規範或公司政策的人員均可 能受到紀律處分,包含解職或解約。



我是否會因為表達疑慮而受到處 罰?

不會。

我們公司不容許針對任何基於善意通 報可能之違規情事或參與調查的人員 採取報復行動。

我們致力於確保無報復行為的文化。每 個人都應該能夠自在地提出疑慮。基於 善意的發聲意指您的通報是出於真心 誠意,不論最後調查結果為何。

您可以提出違反本規範、公司政策或違 法的可疑情事,不需擔心遭受報復或是 會對您的工作造成負面影響。

公司將懲處對舉報者或參與調查者採 取報復行為的人員。



捍衛我們的工作場所

我們必須以誠信對待彼此、確保工作場所安全無虞,並且尊重智慧財產。 瞭解秉持倫理精神捍衛工作場所的所有方式。

對待彼此採尊嚴及尊重的態度

我們透過開放的環境達到最佳成果,在 這種環境下,每位成員都能提出各自的 想法與疑慮。

欣然接納多元化與機會平等

我們來自廣泛的背景、地理位置和文化。多元化賦予我們大膽作夢的觀點和想法。大膽作夢可促進未來的成功。當我們需做出聘僱相關的決策時,例如招聘、升遷和薪酬,我們只考量員工的表現、技能和能力,以及任何法律容許或規定的條件。

我們致力於提供免於因以下因素受到 歧視和騷擾的工作環境,包括,種族、膚 色、信條、宗教、性別、國籍、婚姻狀態、 年齡、性向、性別認同特質或表達、基因 資訊、生理或精神障礙、懷孕、醫療狀 況,或其他受適用法律保護的因素。 我們不容許歧視或騷擾員工、包商、工作應徵者或我們合作夥伴的員工,包含客戶和供應商。

防止及通報騷擾

我們不容許任何形式的騷擾,包含性騷擾。騷擾的定義是任何令人不悅並製造威嚇性、冒犯或敵意工作環境的語言、視覺或肢體舉動。我們也不容許供應商、訪客、客戶或任何第三方的騷擾行為。

在城外的一場會議中,Edwin 的經理在喝醉後以 Edwin 覺得不舒服的方 式碰觸了他。經理告訴 Edwin 如果他們交往,他獲得升遷的機率會比較 大。Edwin 應該怎麼做?

Edwin 應透過他覺得最自在的資源提出他的疑慮。可以是他信任的其他經 理、人力資源部門,或倫理服務專區。Edwin 應可安心這麼做,因為 Western Digital 嚴禁 Edwin 的經理或任何人針對 Edwin 的舉報採取報復行為。

騷擾的實例包括:

- 霸凌、對他人大呼小叫或罵髒話。
- 貶抑、毀謗或「辱罵」。
- 不受歡迎的示愛、具有性暗示的評 論、不當的碰觸或要求提供性服務。
- 涉及個人特質具冒犯性的評論、玩 笑或圖片。

騷擾事件都應立即予以制止∘如您經歷 或目睹騷擾事件,請立即告知您的經 理、人力資源代表或倫理服務專區。

如需更多資訊,請參閱公司的無騷擾工 作場所政策。

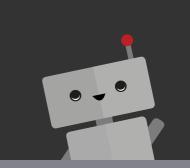
確保工作環境安全無虞

我們公司擁有有效的安全和健康計畫, 以防止事故發生並提高員工的生產力 和十氣。

您必須您必須:

- 瞭解並遵守您所在場所的安全規 則。
- 一律使用必要的安全設備。
- 將工作人體工學和重複性的動作納 入考量。
- 立即通報實際或潛在的安全危害。

請謹記:不論工作有多緊急或多重 要,我們絕對不能忽視安全!暫停 或停止工作以識別和減輕潛在危



Wei 需要維修的重型設備會造成生產線停工,因此壓力很大。安全地移動設 備需要兩個人,但他的同事 30 分鐘後才能過來幫忙。Wei 認為自己或許可 以將這台設備抬起來。Wei 應該怎麼做?

Wei 應該等同事前來協助。如 Wei 嘗試獨力完成,即可能傷害自己並損壞設 備。Wei 應遵守安全守則,即使這表示生產線必須停工。這些守則可以保護 他,也可以保護 Western Digital。

防止及通報工作環境暴力。

公司禁止在工作場所或值勤期的任何 威脅或暴力行為。此禁止事項亦適用公 司相關業務以及任何公司擁有或租賃 車輛或設備的操作。此外,切勿把工作 場所暴力當玩笑。

如果您認為自己或其他人因為工作環 境暴力的威脅,面臨立即危及生命或人 身的危險,請竭盡所能離開該區域。離 開該區域後,立即連繫當地警察。等到 安全時,通知安全部門、您的經理和人 力資源部門。

如您對於潛在的工作場所暴力有任何 疑慮,或受到他人威脅,請通知公司的 資源。如您發現有人可能對您或他人造 成危險,亦應通知公司資源。適當的資 源包括安全部門、您的經理和人力資源 部門。

避免在工作環境吸毒與酗酒

我們對於在公司財產內或執行公司業 務時吸毒及酗酒,均採行零容忍政策。 我們的工作場所內嚴禁違法藥品。

此外,切勿在酒醉或使用任何毒品或可 能減損能力之處方藥物的情況下工作。



保護我們的機密資訊

在現今高度競爭的全球市場,我們的機 密資訊是關鍵資產。機密資訊就是不能 公開的任何資訊。機密資訊包含電子 檔、書面文件,甚至您腦袋中的知識。公 司的成功或失敗取決於我們是否能夠 保護機密資訊。

機密資訊的實例:

- 公司研發資訊,例如發明、專利申 請,以及工程與實驗室筆記。
- 客戶、供應商和員工資訊
- 製造流程與知識。

- 商業策略、未上市產品或服務、行銷 計畫、價格與財務資料。
- 產品或服務相關資訊,包括產品規 格和設計
- 組織資訊,例如,圖表、計畫和薪酬
- 實體物品,例如工程樣品和原型。

若其他人未經授權取得公司機密資訊, 我們可能喪失競爭優勢。

保護手中的機密資訊不被竊取、損壞、 未經授權揭露和不當使用。請務必將此 類資訊存放在安全的地方,並遵守安全 程序。



除非因為業務需求,切勿與任何人討論 機密資訊。與供應商、客戶或其他商務 夥伴互動時,除非雙方已簽署保密協 定,否則切勿透露機密資訊。

得將公司機密資訊儲存在個人雲端儲 存帳戶或個人儲存裝置,除非該帳戶或 裝置已經過公司核准使用。

請勿將機密資訊輸入或上傳至未核准 的資訊系統或平台,例如外部 AI 聊天 機器人、翻譯網站和檔案轉換網站。

請運用一般常識避免意外洩露機密資 訊。

在機場、電梯、餐廳等公共場所,以及商 展等產業相關活動上都必須小心。

如需更多資訊,請參閱我們的全球機密 資訊政策。

面對諮詢或專家互動機會的處理 方式

其他公司可能會找您進行諮詢,或徵詢 您對於科技產業、儲存裝置產業或我們 公司的意見。聽起來像是很棒的機會, 但其實不是。

參與這樣的活動對您與公司都是風險。 您可能會面臨透露機密資訊的壓力。透 露機密資訊將對公司造成損害,而且也 可能違法。

透露關於 Western Digital 或商務夥伴 的內線資訊是違法的行為。

為避免這些風險,切勿接受與技術產 業、儲存裝置產業或我們公司相關的諮 詢機會 (即使您未收費),除非您已事先 透過我們的<公布規範>的內部網路空 間揭露潛在的衝突。

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您亦可能必須取得財務長和法務長的 核准。

有限除外狀況

本規範不限制或阻礙關於潛在違法情 事的政府調查。根據交易機密保護法和 其他適用法律,員工、獨立包商和顧問 在特定情況下向其律師、在法庭上或政 府官員揭露機密資訊無需擔負責任。



尊重他人的智慧財產權

如同我們期望別人尊重我們的機密資訊和智慧財產,我們也尊重別人的智慧 財產權。

商務夥伴資訊

客戶、供應商和其他商務夥伴有時會基於商業目的向我們透露機密資訊。

對待這類資訊一律務必採取與您使用 Western Digital 機密資訊相同的保護 措施。

例如,切勿與其他競爭供應商或從事類 似競爭技術的內部團隊成員分享供應 商的機密資訊。 必要時,倫理與法規遵循以及法務部門 將協助針對特定專案設置智慧財產權 (IP) 防火牆。

IP 防火牆可防止我們不小心將業務合作夥伴未經授權的機密資訊用在我們的產品和流程中。

如您認為您正在進行的專案需要 IP 防火牆,請聯繫倫理與法規遵循或法務部門。

第三方資訊

我們不會在未經許可或無法律權利的 情況下,故意使用第三方的智慧財產。

若您被告知或懷疑我們可能侵害他人 的智慧財產權,包括專利、版權、商標或 交易秘密,請聯繫倫理與法規遵循或法 務部門。

如您得到競爭對手或其他第三方的潛在機密資訊,且

您不確定我們公司或您的部門是否有權取得或使用這類資訊,請拒絕該資訊 (如可能),並且立即聯繫倫理與法規遵 循部門。

未取得倫理與法規遵循部門許可之前, 切勿將該資訊轉傳給任何人。

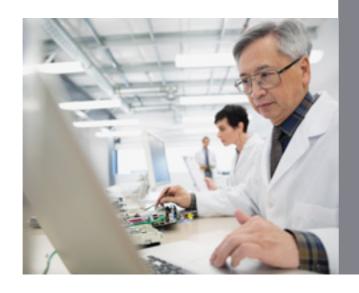
如果有任何人提供您未公開的競爭對 手產品或零件,請立即聯繫倫理與法規 遵循部門。



Vincent 的同事給他一顆競爭對手測試用的硬碟,並聲稱他是從「朋友」 那邊拿到這顆硬碟。磁碟上標有「客戶測試設備:受保密協定規範;非賣 品。」Vincent 是否該對這顆硬碟執行測試?



否。Vincent 不應在這顆硬碟上進行任何測試或分析。他應立即聯繫倫理與法規遵循部門以取得協助。該磁碟可能包含競爭對手的交易秘密或其他機密資訊。在該磁碟上進行測試或反向工程可能致使 Vincent 和公司必須負擔法律責任。



開放原始碼軟體

開放原始碼軟體就是透過免費軟體或開放原始碼授權提供的軟體。在使用、修改或散佈任何開放原始碼軟體以用於公司基礎結構或做為公司產品或服務部門成果的一部分時,請確認您的計畫符合公司的開放原始碼軟體政策。

受版權保護的內容

除非您或 Western Digital 已取得法律 許可,否則切勿在上班時或出於商業目 的,使用或複製軟體、音樂、影像、影片、 出版品或其他受版權保護的內容。切勿 使用我們公司的設施或設備來製作或 存放未獲授權的複製品。

取得與使用商業情報

我們公司會以合法手段收集競爭者、客 戶和市場的資訊。

我們不會以非法或不符合倫理的手段 取得商業情報。切勿透過聯繫競爭對 手、商務夥伴、客戶或第三方試圖取得 競爭對手的機密資訊。

有時我們會意外獲得資訊或是不明來 源會提供資訊給我們。使用這類資訊可 能不符合倫理且違法。在這類情況下, 請聯繫倫理與法規遵循部門以判定如 何進行。

尊重公司的財產與資源

提供高品質的產品和服務需要謹慎使 用公司的資產。我們嚴禁基於個人利益 或不當目的使用公司資源。

公司資源包括設施、車輛、設備、機器、 裝置、資金(包括信用卡)、產品、智慧財 產和技術。 我們的上班時間也是屬於公司資源。保護這些資產,防止失竊、損壞和不當使用等情況。切勿使用公司資源進行成人娛樂,並且切勿將公司電腦用於冒犯性或性相關內容的資料。

確實知道並瞭解我們的資訊技術可接 受使用政策,以及當地與公司資源相關 的政策或程序。



避免利益衝突

工作上務必以 Western Digital 的利 益為第一要務因個人利益(關係、交 易或其他活動) 影響我們在 Western Digital 做決策的情況下發生。即使只是 看似有利益衝突就有可能帶來傷害。

謹慎考量自己的行為,避免利益衝突和 看似有造成衝突的情況。有問題的行為 可能簡單如請任命或民選的地方、州或 聯邦官員吃午餐或晚餐。

如有疑慮,請揭露您的關係、交易或活 動。向您的經理和倫理與法規遵循部門 尋求指引。

兩名員工之間的家庭關係或好友關係 也可能產生利益衝突。這些關係—尤其 是彼此有上下屬關係—即可能看似有 偏心或優惠待遇。

切勿處於對親友具有決策權的處境,反 之亦然。

如您是有下屬的經理,請不要與下屬建 立親密的伴侶關係。如產生這樣的關 係,應立即告知公司。

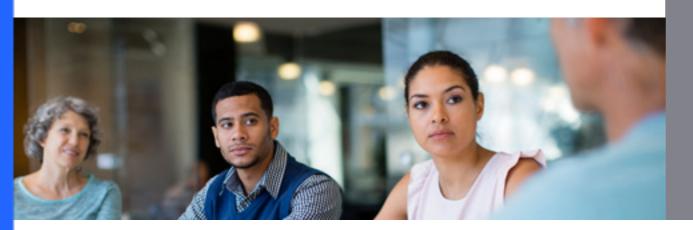
家人或好友係指您與其關係的緊密度 強烈到足以影響您做出公正決定的任 何人。

這可能包括血親或法定親屬、親戚、另 一半 (或其他重要關係的人),或與您同 住的任何人。

我們不可能列出所有利益衝突情況,但 我們的全球利益衝突政策列出常見的 例子,並描述揭露這些狀況的流程。

Gina 最近加入了 Western Digital。她帶領中國的一個工程師團隊。 她的公公經營的私人公司是 Western Digital 泰國子公司的原料供 應商。這種情況是否屬於禁止的利益衝突?Gina 應該怎麼做?

Gina 應向其經理和倫理與法規遵循部門揭露這個關係。其公公經營 的私人公司是商務夥伴。倫理與法規遵循部門將協助 Gina 避免參與 與公公的公司相關的決策。如 Gina 未揭露這個關係,可能導致偏見 的觀感,或更嚴重的話算是實質上違規行為。



揭露利益衝突

如任何關係或活動具有潛在的利益衝突,請務必透明處理。立即與您的經理討論並透過我們的公布規範內部網路空間提交揭露資訊。

我們通常在得知後可以針對利益衝突 立即加以處理。

未披露或隱藏利益衝突情事均違反本規費。

正當使用社交媒體

社交媒體有助於我們建立關係、溝通與 分享想法。但同時也需要良好的判斷與 謹慎的行為。

參與社交媒體時,切勿揭露或不當使用公司的機密資訊或智慧財產。

同樣的,行為必須符合禮儀,且切勿在未經許可的情況下,看似像是代表 Western Digital。

為保護自己和 Western Digital'請詳 閱我們的全球社群媒體政策。

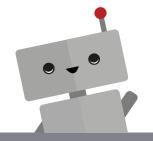


問

Bill 開始在工作場合外與 Western Digital 供應商進行社交。在最近的一次晚餐中,Bill 提到他的女兒非常適合供應商公司的一個工作。這是 Bill 該做的事嗎?

答

Bill 不應該利用他與供應商的關係為他的女兒取得不公平的優勢。如 Bill 相信他的女兒非常適合這份工作,他的女兒應該自已申請,Bill 不 應該利用他與供應商的關係來影響聘用決定。Bill 應向其主管和倫理 與法規遵循部門揭露此狀況。



如您有任何問題或希望提出疑慮,請聯繫您的經理或人力資源部門。

您亦可聯繫倫理與法規遵循部門,電子郵件網址為 www.EthicsHelplineWDC.com。





恪守我們的商業常規

我們有責任遵守全球的隱私權法和商業法規、避免貪腐行為,以及進行公平的競爭。瞭解所有我們行事的方式並恪守符合倫理的商業常規。

公平對待第三方

我們公平對待公司的商務夥伴和競爭 對手。切勿以違法或不公平的手段對付 我們的商務夥伴或競爭對手。

切勿濫用機密資訊、誤導重要事實或採 取不公平的手段。

公平對待客戶

我們對客戶的承諾係指誠信與精確溝 通我們產品與服務的相關資訊。行銷材 料務必精確與完整。基於善意商議合 約。

慎選我們的商務夥伴

本公司嚴格選擇合作夥伴。執行適當的 盡職調查,並且謹慎與公平地選擇供應 商、承包商、代理商、顧問和其他商務夥 伴。 只與符合並且認同我們高倫理行為標 準的夥伴合作。

如您的角色需要與新的商業夥伴互動,請遵循採購與法務部門的評核程序。

確保商業夥伴的誠信,以及對於我們高 倫理標準的承諾。

如果您某個商務夥伴不符合我們的倫理標準或提供的是劣質的產品和/或服務,請立即告知您的經理。



避免貪腐行為

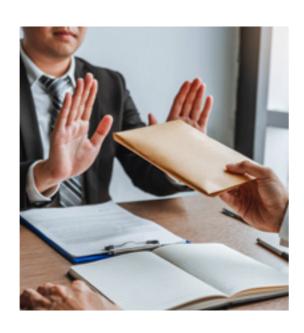
本公司獲得業務倚賴的是我們的產品、 服務和員工。貪腐對於我們的公司和社 群有巨大的負面影響。我們無論在何處 都不會涉及任何形式的貪腐行為。如需 更多資訊,請詳閱我們的全球反腐敗政 箦。

不賄賂

我們的政策很簡單:我們不提供也不接 受賄賂。賄賂是贈與或提供給收受者藉 以影響其行動的任何有價值之事物。雖 然餽贈現金是最常見的形式,但賄賂可 以是任何有價值的事物。

娛樂、旅遊、商品和無形的優待,例如, 僱用家人、捐錢給某人最喜歡的慈善機 構或提供渡假屋使用權都算是賄賂。如 提供的目的是不當影響收受者,就是賄 賄賂不但違反倫理,還可能致使您與公 司受到刑事訴訟、民事罰鍰和懲罰。賄 **賂亦會傷害我們的社群。某些反腐敗法** 律僅著重在公務人員的賄賂行為。

我們公司對於以公平和透明方式執行 業務的承諾不僅止於此。這個承諾適用 我們所有的商業關係,無論往來對象是 公務人員或商業夥伴。我們嚴禁所有賄 賂行為。



我們不要要求優待,也不接受回扣

Western Digital 對於接受優待或收受 回扣採取零容忍政策。

當一方給予決策者有價事物做為獲得 優惠待遇或服務的報酬或獎賞即是回 扣。

切勿要求或收受任何有價事物以換取 業務。嚴禁項目包含金錢、費用、傭金、 信用額度、贈禮、禮金或任何有價物品。

如商業夥伴提供您任何有價事物並且 意圖影響您的決策,請拒絕並立即通知 倫理與法規遵循部門。

Nadia 接到過去合作供應商 Yong 的電話。Yong 情緒激動,因為競爭 公司拿到了我們公司的新合約。他認為應該是他們拿到合約,因為他們 的合約提供回扣。Nadia 該如何處理這種情況?

Nadia 可確實告知 Yong 回扣違反我們公司的政策。她可請 Yong 透過 公司倫理服務專區提出他的疑慮。Nadia 亦可向其經理或倫理與法規 遵循部門通報該問題以進行審查。



第三方

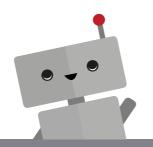
切勿透過第三方代表我們進行賄賂。我 們僅與合法、遵行非貪腐商業常規的第 三方合作。

在高風險地區僱用特定類型的第三方 (例如,分銷商、貨運代理、物流服務提供者、顧問、銷售代表、代理商,以及產品促銷商) 必須取得倫理與法規遵循部門的預先許可。

如需取得預先許可'請遵循我們<u>反腐敗</u> 內部網路描述的盡職調查程序。

向上通報貪腐警訊。

如您發現警訊,立即通知倫理與法規遵循部門。如您懷疑第三方涉及賄賂或其他不當行為,立即通知倫理與法規遵循部門。貪腐警訊包含他人因與對方的「關係」要求您與特定第三方合作、工作內容模稜兩可或僱用技能與工作不符的第三方。詳見我們全球反腐敗政策中的貪腐警訊清單。



講謹記:切勿忽視貪腐警訊。請勇於發聲,幫助公司,也幫助您自己。

與公務人員和政府單位客戶的往來

公務人員包括州政府所擁有實體的員工。他們不一定得位在高位。

他們可以是位階低的員工:

- 任何政府機構 (聯邦、州或地方)。
- 司法單位。
- 軍隊。
- 州立或受州政府控制的私有公司或 實體。
- 國際公共組織。

與公務人員往來

本公司針對與公務人員往來方面訂有明確規定。例如,提供公務人員特定類型的禮品、餐飲和娛樂時,需經倫理與法規遵循部門預先許可。

與公務人員往來時,必須確實知道並遵守我們的全球反腐敗政策和全球商業招待政策。此外,通知倫理與法規遵循部門。您將獲得額外的訓練和指引以保護您與公司。

請<mark>謹記:</mark>在提供公務人員禮品、餐飲和娛樂之前,請確認是否需向倫理與法規遵循部門取得預先許可。

與政府單位的客戶共事時必須掌 握必要的資訊

如與可能是潛在或目前是客戶的政府 官員互動,請特別注意遵守所有適用的 法律。當地的政府通常有其特別的競 標、定價、揭露和認證規定。我們的誠實 與誠信在整個過程極為關鍵。如有任何 關於政府業務的問題,請向法務部門或 倫理與法規遵循部門諮詢。

避免疏通費

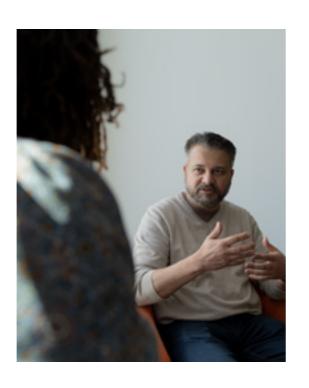
疏通費是指直接付給政府官員小額、非 正式款項,以加速標準政府服務的流 程,例如審查許可或提供公用事業服 務。

切勿支付疏通費。如被要求支付政府官 員非正式款項,請拒絕並聯繫倫理與法 規遵循部門以取得指引。

面對人身安全威脅和脅迫的處理 方式

如果您覺得受到威脅,而您認為最好付 錢以免讓生命、健康、安全或人身自由 處於危險,您應採取必要的動作來保護 自己。當威脅過去後,請立即通知您的 經理以及倫理與法規遵循部門。

同樣的,在您的費用報表中精確記錄所 有此類款項。



餽贈與收受禮品、餐飲和娛樂招待

合理的禮品、餐飲和娛樂招待,以及其 他業務招待有助於培養密切的商業合 作關係。但是,這些招待必須專業且適 當。我們不希望造成看似不當的觀感。

一般來說,只要符合以下所有準則,我 們得提供或接受業務招待:

- 並非意圖影響商業決策或正式行 為。
- 不會給人看似會有影響的觀感。
- 並非收受者直接或間接要求。
- 價值適當且不頻繁。

Western Digital.

- 並非現金(或同價位)贈禮。
- 本質上與性無關或非拙劣品味。
- 遵守所有公司和業務政策,例如,公 司或當地財務政策。
- 取得所有必要的內部核准。
- 法律所允許。
- 收受者公司政策所允許。

供應商可能提供贈禮、餐飲、旅遊或娛 樂招待以培養緊密的業務合作關係。為 保護我們的採購誠信,切勿在採購流程 階段接受贈禮或娛樂招待。

同樣的'切勿接受與 Western Digital 供應商相關採購決策有關聯的贈禮或娛樂招待。

符合我們政策限制規定且包含業務討 論的餐飲正常且可以接受[。]

我們的**全球商務禮儀政策**概述提供與接受業務招待的規則與程序。

如您向第三方提供贈禮、娛樂或其他業務招待,請確實知道並遵守本政策。

如果不確定是否可以收受贈禮、餐飲或 娛樂招待,請徵詢您的經理或倫理與法 規遵循部門的意見。

贈禮和娛樂招待有何不同?

贈禮可以是任何 (招待人本人亦出席之餐飲和娛樂招待以外) 收受者認為有價值的東西。

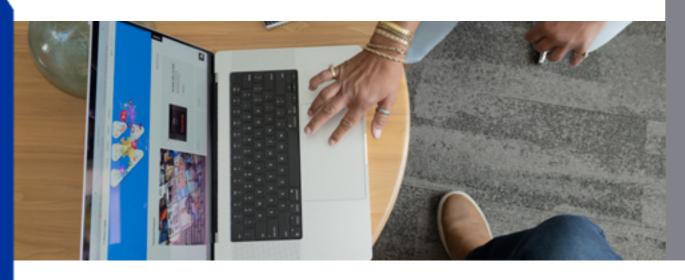
這包括現金、商品、禮券、施惠、服務、免費使用度假屋、個人借貸或日後做某些事情的承諾。

娛樂招待包含陪伴商務夥伴出遊、住宿 旅館、飯局以及文化節目或體育賽事。 我們將招待人未出席的餐飲、運動賽事 或其他招待視為贈禮。



Cindy 最大的客戶是個熱衷運動的粉絲。Cindy 希望為過去一年慶功並且討論新的產品。她計畫招待客戶的團隊到一家很棒的餐廳吃晚餐。用餐時,Cindy 還計畫給客戶四張近期運動賽事的前排貴賓席門票。Cindy 本人不會參加該賽事。Cindy 的安排是否恰當?

如餐廳符合我們全球商務禮儀政策的限制, Cindy 的晚餐計畫是沒有問題的。既然 Cindy 不會參加該賽事, 門票應該算是贈禮。但是熱門運動賽事的前排貴賓席門票很有可能就超出政策的贈禮限制。這樣的門票也很可能超過客戶公司政策可接受的限制。 Cindy 應遵守全球商務禮儀政策, 並且在有問題的時候向倫理與法規遵循部門尋求協助。





公平競爭

我們公平對待競爭對手,就如同我們希 望被對待的方式。雖然我們會將競爭對 手的產品與自身產品比較,但不會以不 正當的方式貶抑之。此外,當公司聘僱 競爭對手或其他第三方的前員工時,我 們不容許員工透露前僱主的機密資訊。

保有競爭關係

競爭或反壟斷法可促進競爭,維護消費 者權益。他們可帶動創新和更優惠的價 格∘這些法律禁止競爭對手之間可能破 壞競爭市場的一些協議或共識。

這些法律亦規範強勢公司並容許政府 介入可能大幅降低競爭的合併、收購案 和其他交易。

違法的反競爭行為實例:

- 操縱價格:競爭者同意針對特定產 品或服務訂立特定價格。
- 限制產量:競爭者同意限制產量,一 般會導致較高的價格。
- **圍標:**競爭者投標時,同意讓特定投 標者贏得標案。
- 依產品、地理位置或客戶分割或分 配市場:競爭者同意限制其在特定 市場或類別的銷售量,使每家公司 都是特定買家的唯一選擇。
- 操縱薪資:競爭對手同意向特定員 工或特定角色支付一定的薪水。
- 不挖角、不招攬協議: 競爭對手同意 不僱用(或招攬)對方的員工。

如您的友人任職於競爭公司或您所參 與的專案當中,有競爭對手是商務夥 伴,務必特別小心。參與商展活動、研討 會和產業會議時亦必須小心。

切勿與我們的競爭對手討論競爭資訊, 例如,價格、其他銷售資訊、產能或機密 商業計書。

如果有我們的任何競爭對手嘗試與您 討論上述任何主題,請告知不會與對方 討論這個主題。立即結束對話並通知法 務部門。

有時與競爭對手往來沒有關係。例如, 您可與剛好也是競爭對手的朋友或業 務夥伴有完全私人的交情。

換句話說,避免與競爭對手非必要的互 動,將不希望有的風險降至最低。

切勿操縱價格或防止競爭對手評估市 場。切勿搭售或不當綑綁銷售產品。切 勿抵制客戶或供應商。

如您參與結構性回饋或其他定價計畫, 請確認已受到完整訓練,並且遵守法務 部門針對適當與不當競爭方式的建議。

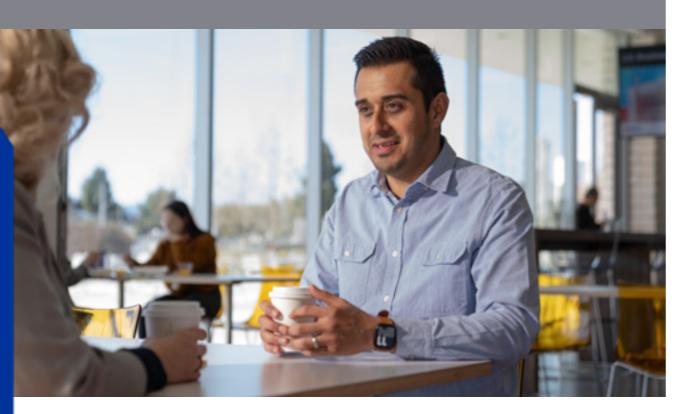
不要與競爭對手就員工薪酬或招聘做 法達成協議。

如果您得知有任何可疑的事件,請立即 通知您的經理以及法務部門。如需更多 細節,請參閱我們的全球反壟斷法(反 托拉斯法)。

Western Digital.

Erik 在銷售會議遇到老朋友 Allison。他得知對方目前在其中一家 競爭對手任職。兩人負責相同的銷售區域。Allison 建議雙方將價 錢調高至相同的金額。如此兩家公司都能在不流失任何客戶的情 況下獲得更高的利潤。Erik 該怎麼做?

Erik 必須告訴 Allison 他不能跟她討論這個主題'而且也不會同意。他必須立即結束對話'也必須立即聯繫法務部門。若 Erik 和 Allison 私底下達成共識'甚或是 Erik 未能停止雙方的對話'都可能導致受到競爭法的刑罰。



遵守全球貿易規範

做為一家全球性公司,我們在擁有全球 貿易相關法律的國家開展業務。全球貿 易規範涵蓋產品、軟體和技術的銷售、 運輸和支援。違反這些法律可能危害公 司的商譽,導致公司失去客戶及業務合 作夥伴。

這還可能損害我們在全球政府機構中的良好聲譽,導致進出口處理得延遲。 不遵守規定還可能導致罰款、處罰、失 去出口權或牢獄之災。

全球貿易活動包括:

- 將實體貨物從一個國家運送到另一個國家。
- 將軟體 (物件程式碼) 從一個國家傳輸到另一個國家。

- 透過電子郵件、討論或其他管道將 技術、智慧財產權 (IP)、或原始碼從 一個國家傳輸到另一個國家。
- 透過電子郵件、討論或其他管道將 技術、IP 或原始碼從一個國家傳給 另一個國家國民的個人。
- 僱用能夠存取公司或第三方技術、IP或原始碼的外籍人士或合約人員。
- 以隨身攜帶方式將原型、樣品或其 他公司資產從一個國家運送到另一 個國家。
- 提供支援,包括技術協助給美國實體名單上的公司或禁運或制裁的目的地。

慎選我們的商務夥伴

與客戶、分銷商、合約製造商、銷售商、 供應商和其他業務合作夥伴進行的所 有銷售、工程、製造、採購和支援活動, 均依據一般使用者和一般使用篩選要 求。

勿與禁運國家或受法律限制的個人或公司有業務往來。我們公司訂有完整的流程來規範我們的貨運作業和以及篩選商務夥伴。與商務夥伴往來時,請確實瞭解與遵守這些流程。

遵守反抵制法

我們遵守反抵制法。我們公司不會配合 美國或當地相關法律禁止的任何限制 性貿易慣例或抵制。

您可能會遇到被要求參與這類抵制的情況。這些要求可能會在托運文件、採 購單、合約或信用狀上。

如果您收到支持或參與抵制的要求,請立即聯繫法務部門。

如您參與任何貿易活動,務必瞭解和遵守所有適用的貿易政策。

如您不確定特定交易或任何其他活動,請透過 ServiceNow 聯繫全球貿易準則團隊以取得指引。如需更多資訊,請參閱我們的全球貿易政策。

遵守全球隱私權保護法

我們保護員工、商務夥伴、客戶和一般 使用者的個人資訊。

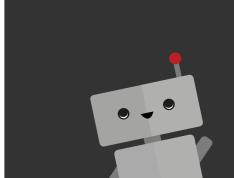
我們在所有涉及個人資訊的商業流程 的每個步驟均將隱私權列入考量。

個人資訊是指與已識別或可識別個人相關的任何資料。例如,名字、地址、身分證號碼和 IP 位址。

其他類型的個人資訊可能比較敏感,需要特別處理。

工作上處理個人資訊時:

- 保護。
- 只存取您需要的資訊。
- 與認同我們對於隱私權承 諾的商業夥伴合作。
- 向上通報疑慮、威脅和未 經授權的存取。





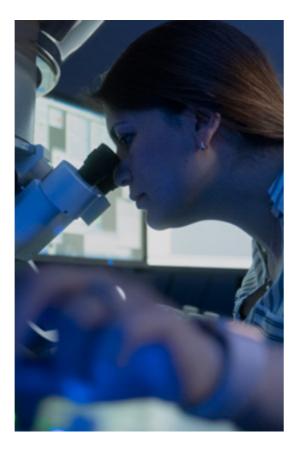




雖然公司尊重隱私權,但在管理員工陣 容以及商務夥伴方面,亦必須遵守法 律、政策和其他承諾。

Western Digital 保留檢驗公司設施和 財產的權利。這包含但不限於電腦、通 話記錄、置物櫃、電子郵件、檔案、業務 文件、辦公室和工作站。

除非適用法另外提供保護,否則在使用 公司提供的服務、網路、電腦、智慧型手 機或設備時,切勿期待享有隱私權。即 使在個人裝置上工作亦適用相同規則。



防範洗錢行為

洗錢是指嘗試隱匿透過非法行為取得 的金錢,或嘗試讓金錢看起來合法。

可疑行為的例子包括要求付現金、將單 筆金額分拆成多筆交易、使用海外銀行 帳戶以及任何其他不尋常的付款方式。

洗錢和反恐問題可能相當複雜。我們針 對商務夥伴進行盡職調查,試圖防範洗 錢行為。

我們議會監督他們的活動,並且通報任 何可疑的行為。如果您遇到任何似乎不 對勁的交易,請聯繫倫理與法規遵循部 門。

如您有任何問題或希望提出疑慮,您的經理是最佳的人選。

人力資源部門或其他您信任的經理亦是很好的選項。您亦可聯繫倫理與法規遵循 部門,電子郵件網址為 compliance@wdc.com 或我們的倫理服務專區,網址為

如需更多資訊,請參閱我們的全球隱私權政策。我們亦有由隱私權專業人員組成的 團隊,包含資料保護專員,為您提供協助。如有任何問題,請聯繫 dpo@wdc.com。



支持我們的股東

我們保護機密資訊、避免內線洩密與交易、維護精確的帳簿和記錄,以及 配合內部調查和稽核。進一步瞭解我們如何捍衛股東的價值。

避免內線交易和洩密

任職於 Western Digital 期間,您可能 會取得公司內部不對大眾公開的資訊。 如果此資訊屬於重大資訊,表示這可能 會影響某人買進或賣出公司股票 (或其 他證券) 的決定,這即構成所謂的內線 消息。

可能是內線消息的例子:

- 重大合併、收購、公開收購或股權交
- 重大訴訟案件。
- 尚未公開揭露的財務結果或預測。
- 債券發行或其他財務交易。
- 股票發行或買回。
- 重大資安事件、資料外洩或類似事

切勿在知道這些公司相關內線消息的 情況下買賣公司股票或證券(內線交易)

同樣地,切勿向可能買賣該公司股票或 證券的人透漏關於公司的內幕(洩密) 消息。兩者均違法且違反公司政策。

如您對特定資訊是否可能被視為內線 消息有任何疑慮,請參閱我們的內線交 易政策,並向法務部門尋求指引。

問

Jennifer 為了幫助公司完成合併案加班到很晚。回到家後,她的兒子Thomas 為何這麼晚才下班。Jennifer 告訴他關於近期合併案的資訊。隔天,Thomas 買了母親公司的股票。Jennifer 告訴 Thomas 關於合併案的事沒問題嗎?Thomas 買了 Jennifer 公司的股票沒問題嗎?

答

否。關於可能合併案的消息是投資者認為重要的資訊。因此,這不但是重要,也是非公開的資訊。直到合併消息公開發布以前,Jennifer不得將此資訊透露給其他人,以免構成洩密行為。此外,直到合併消息公開發布以前,Jennifer亦不得買賣自家公司或涉及合併案另一家公司的股票。Jennifer和 Thomas 可能因違反內線交易法面臨刑事責任。

我們所有人都有內幕消息,並非只有高階主管。如您知曉關於公司的內幕消息,請務必保密。直到該資訊公開發布當日或至少經過一個交易日才進行公司股票或證券的交易。

在您進行涉及公司股票或證券的交易或考慮交易之前,確認您已熟悉我們內線交易政策。如有任何問題,請向法務部門或自己的法律顧問諮詢。

維持帳簿和記錄的精確性

公司的會計帳簿和記錄務必精確且完整。帳目和記錄若有出入,可能會違反 美國和其他國家的法律。

我們每個人都可透過收集和記錄的資訊確保公司帳簿和記錄的精確性。例如,我們必須精確記錄我們的工時,以及完成的工作

我們亦必須確保測試結果、費用報表以 及營業支出和收入等等的精確度。

為確保公司記錄的完整性:

確認您準備或核准的所有記錄均精確且完整。

- 切勿與商務夥伴進行任何非正式的 附帶協議(例如,口頭或未寫入合約 的協議)。
- 記錄的保存須依據公司的記錄保存期限。
- 記錄的披露需經過公司政策的授權 或訴訟程序所要求。
- 立即通報任何不正確、有誤導之虞 或捏造的帳目記錄。

謹慎處理現金交易

謹慎處理現金。進行現金和銀行帳戶交易時,務必遵守適當的會計程序。





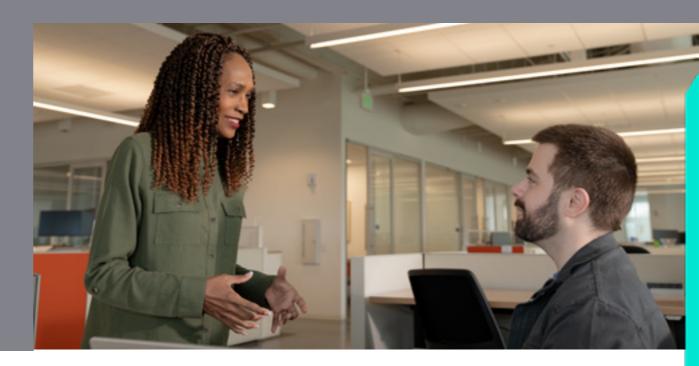
嚴禁帳外帳戶

嚴禁帳外交易。此即所謂的「第二本帳簿」、「賄賂基金」、「餅乾罐」或「兩天基金」。切勿基於任何目的成立未披露或未記錄的基金或資產。

無論從基金的支出是否會被追蹤;所有 帳目都必須列於帳簿中。所有交易皆需 適當地記錄於公司的正式帳簿和記錄 中。如您得知任何帳外交易,請立即聯 繫倫理與法規遵循部門。

- Maria 正與行銷服務提供者進行商議。她也是討論所有費用 1% 回饋的電子郵件收件人之一。供應商會將該回饋另外撥出,並且依Western Digital 的指示支付隨需的行銷活動。Maria 已經看過草擬的合約,合約中未提及這樣的回饋或回饋給 Western Digital 的方式。Maria 知道這是整個協議中極為重要的條件,且財務部門必須知道。面臨這樣的情況 Maria 該如何應對?
- Maria 對於該回饋必須適當寫入合約並且經過財務部門審查的認知是正確的。否則,這即可能構成帳外帳戶和附帶協議。Maria 必須與團隊共同取得財務部和法務部門的指引。他們可協助適當地在合約中架構與寫入回饋條款的事宜。

- Jin 負責維護部分財務報表的更新。很不幸的,因為他最近忙於其他專案造成報表資料過時。他剛得知負責的報表需要稽核。Jin 是否可以編輯這份書面資料,使其正確無誤後再送交稽核?
 - 否。Jin 在稽核期間未經許可不得更改任何文件。如果他認為這些記錄無法正確反映公司的財務狀況,應向經理徵詢他的意見。他的經理可協助他找出可真實地將此情況披露於稽核員的正確方式。在未來,Jin 需確保其檔案的適當更新。如此他和同仁在需要的時候才有精確的資訊可使用。



嚴禁非正式附帶協議

為確保記錄和營收與支出預測的精確性,務必精確與完整地記錄協議中所有的重要條款。

這包含與客戶、供應商和其他商務夥伴的協議。

書面合約或採購/銷售單以外的協議均被視為「附帶協議」。附帶協議又稱為「私下交易」或「附加協議」。附帶協議可以經由會議或電話交談以口頭方式,或透過電子郵件與郵件以書信方式進行溝通。

我們嚴禁附帶協議,因為這樣的行為規避了制定的財務與其他控制措施。

將所有新的協議或修改內容正式納入 涉及公司業務或資源的現有協議中。由 授權公司代表依據公司政策和程序執 行該協議。任何標準與經預先許可合約 語言以外的條款或條例均需取得法律 與財務部門的預先許可。

如您得知任何附帶協議,請立即聯繫法務部門。

配合內部調查和稽核

確實完成 Western Digital 指派的內部或外部稽核人員、律師或調查人員所交付的要求。將及時、完整和精確的資訊給這些人員。

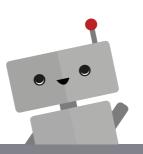
切勿隱匿資訊。切勿試圖誤導或不當影響任何調查、稽核或查詢。

請謹記:我們公司絕不容許針對參與稽 核或調查者的報復行為。 Western Digital 重視政府機關提出的 任何資訊要求。

如果您得知政府要求提供資訊或政府展開調查,請立即聯絡您的經理和法務部門,如此法務部門才能確保公司作出正確適當的回應。

在未取得法務部門的指示之前,切勿回 答問題或出示文件。





如您有任何問題或希望提出疑慮,請聯繫您的經理或倫理與法規遵循部門 (包括 <u>compliance@wdc.com</u> 以及我們的倫理服務專區 <u>www.EthicsHelplineWDC.com</u>)、人力資源或法務部門。







參與政治和慈善活動

個人參與

公司不限制您個人選擇參與的合法政 治或慈善活動,但務必遵守下列兩個簡 單原則:

 務必明確表明您是以個人身分參與;切勿與 Western Digital 連結或 以其他方式暗示 Western Digital 認可該活動。 • 不使用上班時間或公司資源進行個 人政治活動。

建立我們的社群

我們支持慈善活動、推展環境永續性,並且以負責任的態度進行溝通。瞭 解我們建立社群的所有方式。



公司參與

未經公司執行長和法務部門預先許可, 切勿投注公司資金、使用公司名稱、設 施或其他公司資產,或支持政治活動 (依據美國政治活動政策)。

「政治活動」泛指任何與推銷政治候選 人、政黨或議題相關的行為。

這亦包含在美國境內外的政治活動捐 贈、主持政治活動、影響立法和其他類 似的活動。

如您計畫使用任何 Western Digital 資 金或資源進行慈善活動,請詳查並遵守 公司資金和資產的慈善捐贈政策和公 司許可要件及委託授權政策。

全球贈與和行為及/或倫理與法規遵循 針對特定慈善活動要求預先許可。



實現環境和社會的永續發展

我們公司透過保護環境、節約資源以及 支持人民和社群以達成永續經營。我們 不僅守法並且滿足客戶的期望,我們還 努力在永續發展上成為業界的領頭羊。 無論您的職責是什麼,都在 Western 的永續發展策略中扮演重要的角色。

人權

我們公司尊重並支持所有人的人權,我 們希望我們的員工和業務夥伴也能這 麼做。

我們的全球人權政策適用於我們的員 工和供應商,這體現了這個承諾。這也 符合國際人權標準。

Western Digital.

具體來說,我們:

- 維護一個尊重且包容的工作場所。
- 防止強迫勞動和童工。
- 維護公平且安全的工作條件。
- 遵守負責任的薪酬運作。
- 支持結社和行動自由。

如您認為我們或供應商的任何做法與 這些價值觀不一致,請聯繫您的經理或 其他合適的公司資源。





能源和排放

減少溫室氣體排放是我們公司永續發 展的最高優先事項之一。

為支援此一優先事項,我們制定了積極的公共目標,包括在 2030 年使用 100% 再生能源,以及在 2032 年我們的營運達成淨零排放。

您可透過節電、以創新作法降低能耗, 以及尋找避免燃料排放(包括飛行)的 機會來支持這些目標,並幫助減輕氣候 變遷最嚴重的影響。

資源保護與廢棄物管理

我們負責任地保護資源並管理廢棄物。

透過減少材料的使用,無論是水、紙張或任何其他資源,您都可降低我們對環境的影響和成本。

適當管理廢棄物可創造一個更乾淨的 地球和更安全的工作場所。遵守您所在 場所有關安全處置危險廢棄物和隔離 其他廢棄物的政策。盡可能再使用或回 收。

面對外界查詢的處理方式

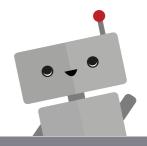
我們公司向外界披露的資訊必須精確 且一致。

因此,公司公關團隊負責與媒體的溝通。如果有媒體找上您,請轉由公關部門處理,勿自行回答任何問題。

如果有分析師或投資人找上您,請建議他們聯絡公司的投資者關係團隊。

如有人要求您代表公司接受流程服務 或執法部門、政府機構或公務人員要求 提供訊息,請聯繫法務部門以取得建 議。

如您有任何問題或希望提出疑慮,您的經理、人力資源或其他您信任的經理都是最佳的人選。



您亦可聯繫倫理與法規遵循部門,電子郵件網址為 compliance@wdc.com 或我們的倫理服務專區,網址為 www.EthicsHelplineWDC.com。







其他有用的支援資源

查閱重要聯絡資料、取得處理特定問題的詳細指引,並且瞭解如何聯繫 倫理與法規遵循部門。

其他有用的支援資源

處理特定問題的詳細指引

請瀏覽公司內部網站的倫理與法規遵 循網頁空間。您可找到更深入探討本規 範所述議題的政策與準則。其中亦包含 資訊圖表、揭露形式和其他資料,幫助 您成功解決棘手的狀況。

聯繫倫理與法規遵循部門

寄送電子郵件至

compliance@wdc.com。個別團隊 成員的聯絡資訊位於倫理與法規遵循 內部網路空間。如為貿易疑慮,請透過 ServiceNow 提交要求。

聯繫公司的資料保護專員

如為資料隱私問題或疑慮,請寄送電子 郵件至 dpo@wdc.com。此電子郵件 地址是公司資料保護專員的專屬信箱。

舉報潛在的倫理疑慮

造訪倫理服務專區,網址為

www.EthicsHelplineWDC.com。倫 理服務專區將有可說營業所在地當地 所有語言的專員為您提供服務。當地電 話號碼位於**倫理與法規遵循**內部網路 空間。











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.

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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.

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.

W Western Digital.



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.

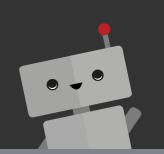
KEEPING OUR WORKPLACE SAFE

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.

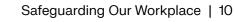


- Wei is under pressure to repair a heavy piece of equipment that is stopping the production line. Moving the equipment safely requires two employees, but his co-worker can't come help for 30 minutes. Wei thinks he can probably lift it by himself. What should Wei do?
- Wei should wait for his co-worker 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.

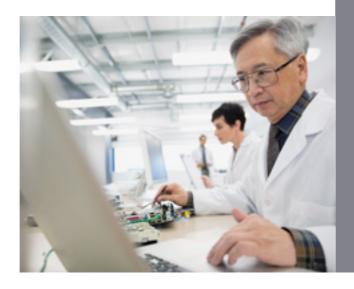
If you're told or suspect that we may be infringing another's intellectual property, including patents, copyrights, trademarks, or trade secrets, contact Ethics and Compliance or the Legal Department.

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.

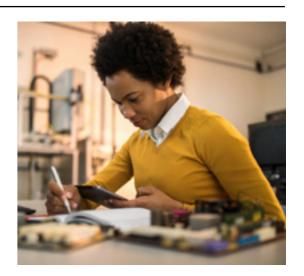
USING SOCIAL MEDIA APPROPRIATELY

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.

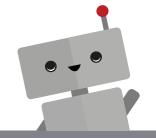
Likewise, act respectfully and do not appear to speak on behalf of Western Digital without permission.

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.

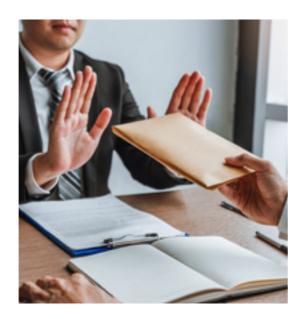
No bribes

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

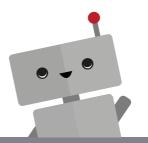
Never use a third party to pay bribes on our behalf. We work only with third parties that engage in legitimate, noncorrupt business practices.

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.

W. Western Digital.

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

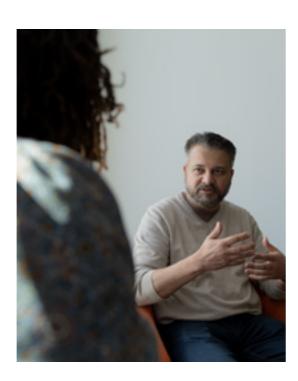
A facilitation payment is a small, unofficial payment made directly to a government official to secure or expedite standard government services, such as processing permits or providing utility services.

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.

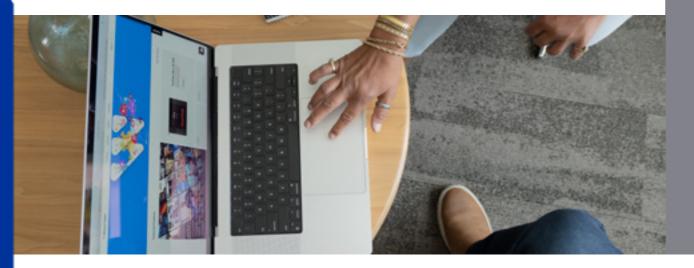
This includes cash, goods, gift certificates, favors, services, use of vacation homes, personal loans, or promises to do something in the future.

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.



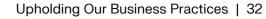
to celebrate a successful year and discuss new products. She plans to treat the customer's team to dinner at a nice restaurant. During the dinner, Cindy also plans to give the customer tickets for four premium, front-row seats at an upcoming sporting event. Cindy won't be attending the event. Are Cindy's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

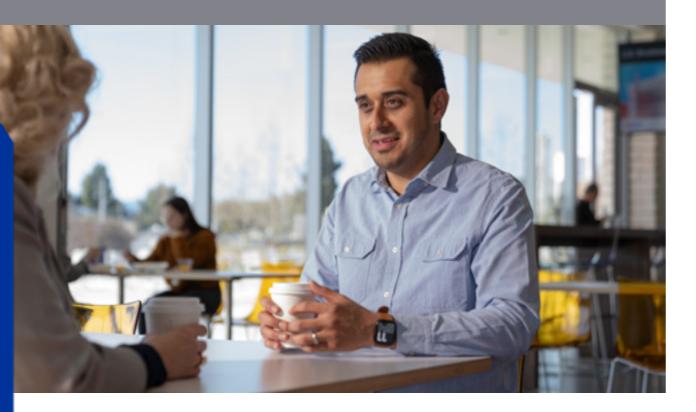






Erik runs into his old friend Allison at a sales conference. He learns that she now works for one of our competitors. They both cover the same sales area. Allison suggests that they raise prices the same amount. That way both companies can make more money without losing any customers. What should Erik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

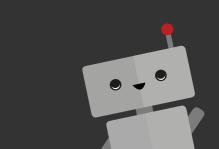
We protect the Personal Information of our workers, business partners, customers, and end users.

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.







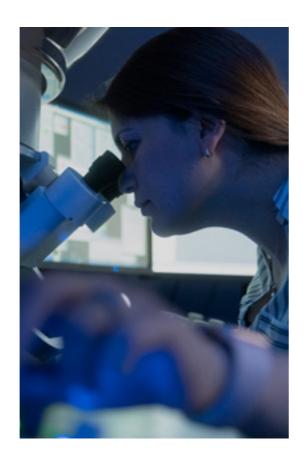




While the Company respects privacy, it must also manage its workforce and business partners in compliance with laws, policies, and other commitments.

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.





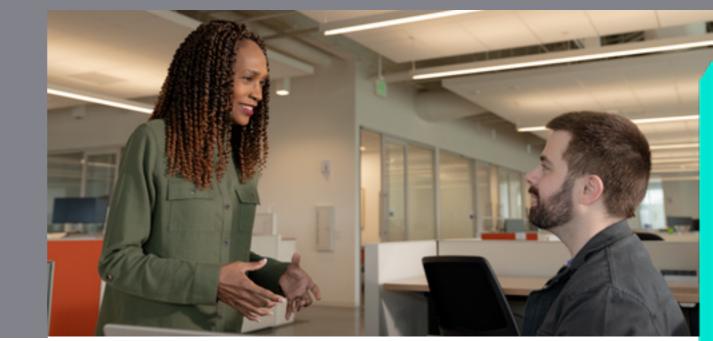
Off-book accounts are prohibited

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.

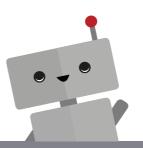
Do not withhold information. Do not attempt to mislead or improperly influence any investigation, audit, or inquiry.

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

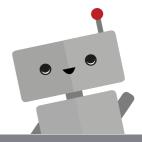
The information our Company shares with the public must be accurate and consistent.

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.









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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