



Western Digital®

# Global Code of Conduct



# 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

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Dear Fellow Employees,

At Western Digital we have a strong tradition of being honest and ethical in everything we do. We continually earn the trust of our stakeholders by acting with the highest ethical standards every day. Our Global Code of Conduct embodies this commitment to integrity.

The Code is a valuable resource to help each of us understand our ethical and legal obligations. It applies to all employees. The principles in our Code are fundamental to who we are as a company. Please read this document carefully and take the time to understand its contents.

Our Code is anchored in our values: Think Big, Create Possibility, Make It Happen, and Do It Together. It guides us to safeguard our workplace, uphold the integrity of our business practices, deliver value to shareholders, and improve our communities. Although it cannot address every ethical question or describe every ethical dilemma you might face in your role, it does provide a practical framework to inform your decisions and guide your actions.

Each of us is personally responsible for protecting our culture of ethics and compliance. This includes speaking up when something doesn't seem right, and supporting your teams in doing the same. It is important to me that every employee feels safe in sharing concerns with a trusted manager, Human Resources, Legal, or the Ethics Helpline. Western Digital takes all reports seriously and absolutely prohibits retaliation against anyone for raising a concern in good faith.

Thank you for your personal commitment to ethics and compliance. Every bit we produce, every product we ship, and every positive stakeholder experience starts with that commitment.

Regards,

David Goeckeler, CEO

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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

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## 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.

- 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.

### 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.

## 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

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## 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](http://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.





## 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

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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.



**Q** 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?

**A** 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 [Harassment-Free Workplace Policy](#).



# KEEPING OUR WORKPLACE SAFE

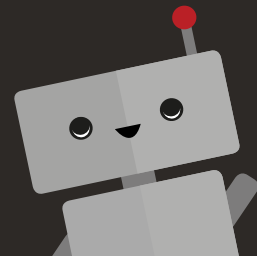
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Our Company has effective safety and wellness programs to prevent accidents and increase employee productivity and morale.

## 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.



**Q** 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?

**A** 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

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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 AI 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

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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 third-party 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.

**Q** Vincent's colleague hands him a competitor's solid-state 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?

**A** 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

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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

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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 appearance 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.

**Q** 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?

**A** 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

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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.

**Q** 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?

**A** 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.



# USING SOCIAL MEDIA APPROPRIATELY

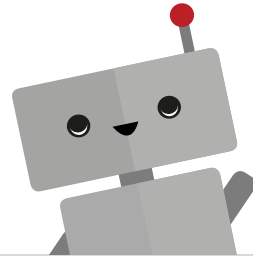
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Social media helps us connect, communicate, and share ideas. It also requires good judgment and discretion.

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](#).



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](http://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

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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

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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.

**Q** 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?

**A** 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

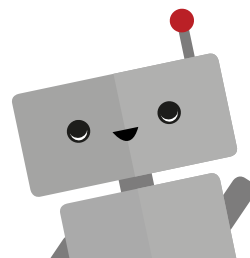
Never use a third party to pay bribes on our behalf. We work only with third parties that engage in legitimate, noncorrupt business practices.

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

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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.

## 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

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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.





**Q** Cindy's biggest customer is a huge sports fan. Cindy wants 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?

**A** 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

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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 anti-competitive 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](#).



**Q** 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

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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

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

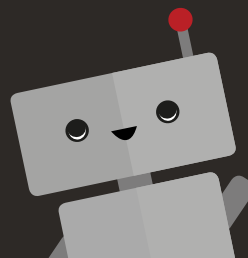
We consider privacy at every step of all business processes that involve Personal Information.

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:

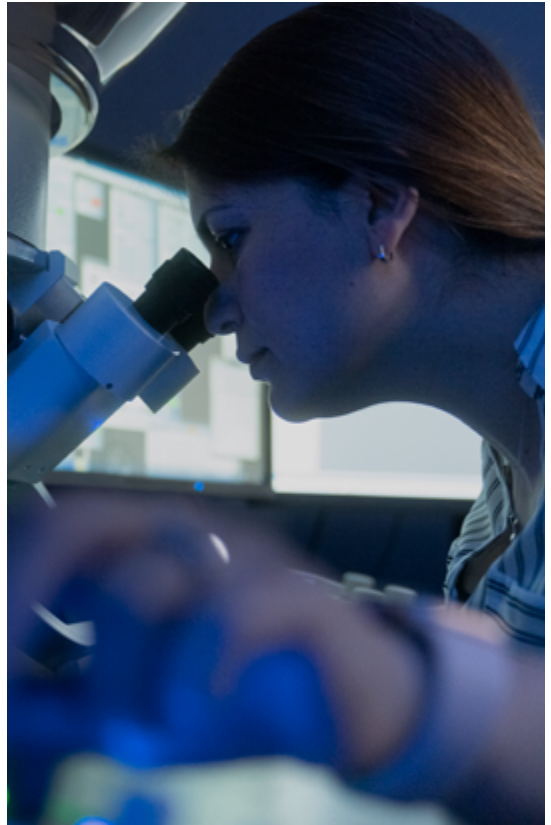
- Protect it.
- Only access what you need.
- Work with business partners who share our commitment to privacy.
- Escalate concerns, threats, and unauthorized access.



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.



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](mailto:dpo@wdc.com) with any questions or concerns.



# AVOIDING MONEY LAUNDERING SITUATIONS

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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 anti-terrorism 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.

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](mailto:compliance@wdc.com) or through our Ethics Helpline at [www.EthicsHelplineWDC.com](http://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

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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.



**Q** 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?

**A** 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

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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.

**Q** 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?

**A** 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.



**Q** 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?

**A** 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

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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.

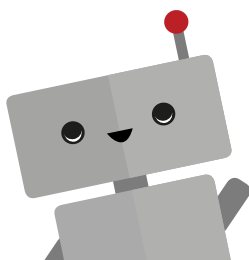
Do not withhold information. Do not attempt to mislead or improperly influence any investigation, audit, or inquiry.

**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](mailto:compliance@wdc.com)) and our Ethics Helpline at [www.EthicsHelplineWDC.com](http://www.EthicsHelplineWDC.com)), Human Resources, or the Legal Department.





# Building Our Communities

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



# PARTICIPATING IN POLITICAL AND CHARITABLE ACTIVITIES

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## 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:

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



## 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

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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

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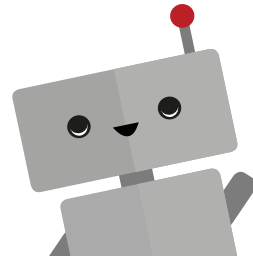
The information our Company shares with the public must be accurate and consistent.

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 yourself.

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](mailto:compliance@wdc.com) or through our Ethics Helpline at [www.EthicsHelplineWDC.com](http://www.EthicsHelplineWDC.com).





# Additional Helpful Resources

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

## ADDITIONAL HELPFUL RESOURCES

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### 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. You can also [request training](#) for your team.

### Contact Ethics and Compliance

Send an email to [compliance@wdc.com](mailto: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](mailto: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](http://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.



