

Mandatory fields are marked with a red indicator.

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## Harassment-Free Workplace Policy

Western Digital (“WD”) strives to provide a workplace free of sexual harassment, as well as harassment based on race, color, ancestry, religion (including religious dress and grooming standards), sex (including pregnancy, childbirth or related medical conditions, breastfeeding or related medical conditions), gender (including a person’s gender identity, gender expression, and gender related appearance and behavior, whether or not stereotypically associated with the person’s assigned sex at birth), age, national origin, sexual orientation, medical condition, marital status (including domestic partnership status), physical disability, mental disability, medical condition, genetic information, denial of family and medical care leave, Civil Air Patrol status, military and veteran status, or other legally protected characteristics.

The Company strongly disapproves of and will not tolerate harassment of employees or contractors by Managers, co-workers, clients, vendors, or customers of WD. Harassment includes unwelcome verbal, visual, or physical conduct that creates an intimidating, offensive, or hostile working environment, or that interferes with work performance. Such conduct may constitute harassment when:

- Submission to the conduct is made either an explicit or implicit condition of employment or other relationship with the Company;
- Submission to or rejection of the conduct is used as the basis for employment decisions affecting the individual or other decisions affecting the relationship of the individual (or entity the individual represents) with the Company; or
- The harassment unreasonably interferes with an individual’s work performance or relationship with the Company or creates an intimidating, hostile, or offensive work or business environment.
- Harassing conduct can take on many forms and includes but is not limited to slurs, jokes, statements, gestures, pictures, e-mail, or cartoons regarding an employee’s age, ancestry, color, disability, marital status, medical condition, national origin, race, religion, sex, sexual orientation, gender identity, or protected veteran status.
- Sexually harassing conduct in particular includes all of these prohibited actions as well as requests for sexual favors, conversation containing sexual comments, and unwelcome sexual advances. Same-gender harassment is also included in the definition.

The following is only a partial list of conduct that may constitute sexual harassment:

- Unwanted sexual advances, physical contact, or touching – for example, the unwelcome placing of your hand on a co-worker’s shoulder or around his or her waist; or touching, rubbing, or brushing against an intimate part of another person’s body; or impeding or blocking movements.
- Visual conduct – leering, making sexual gestures, or displaying sexually suggestive objects or posters of scantily-clad individuals.
- Verbal conduct – making or using derogatory comments, epithets, slurs, or jokes – or using terms of endearment such as “honey,” “dear,” or “sweetheart.”
- Verbal abuse of a sexual nature – graphic verbal commentaries about an individual’s body; sexually degrading words used to describe an individual; or suggestive or obscene letters, gifts, notes, or invitations.
- Requesting sexual favors for advancement in the Company is an obvious violation. Less obvious violations include punishing a subordinate’s rejection of affection, romantic, physical, or sexual advances; or manipulating a subordinate’s work schedule so that he or she is required to go to dinner, travel, or otherwise be alone with the Manager.

## Reporting, Investigation and Discipline

You should not tolerate harassment. You are responsible for promptly notifying management, Human Resources, Employee Relations or the Legal Department, verbally or in writing, if you feel you or any other person on WD premises is being harassed, discriminated, or retaliated against. You may also call the toll-free Ethics Hotline at 877-548-6716 to report a claim of harassment. You are not required as a first step to voice your complaint to the person you feel is responsible for the harassment.

Any manager or supervisor who observes any form of unlawful discrimination, harassment or retaliation, must report the conduct to Human Resources, Employee Relations or the Legal Department so that an investigation can be made and remedial action taken, if appropriate.

When WD receives allegations of harassment or any other unlawful conduct, WD will conduct a fair, prompt, and thorough

investigation that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. WD will attempt to keep the matter confidential to the extent possible, consistent with the needs of the investigation. The results of the investigation will be promptly communicated to the appropriate person(s) and corrective action will be taken as warranted. WD's complaint process is designed to ensure that complaints receive a designation of confidentiality to the extent possible, a timely response, impartial and timely investigations by qualified personnel, documentation and tracking for reasonable progress, appropriate options for remedial actions and resolutions, and timely closures.

*Corrective Action:* If harassment or other inappropriate conduct is found to have occurred, appropriate corrective action will be taken, tailored to the particular offense.

Appropriate action might range from counseling to termination in the case of employees, and from warnings to the termination of the business relationship, in other cases.

*No Action Required:* If the claim cannot be substantiated or has no merit, then corrective action will not be taken against either party.

### **Protection from Retaliation**

WD strictly prohibits any form of retaliation for good faith reports or complaints of discrimination or harassment, pursuing any discrimination or harassment claim, or cooperating in related investigations. You are responsible for promptly notifying management, Human Resources, Employee Relations, the Legal Department, or the Ethics Hotline at 877-548-6716 or <https://wdchotline.com> if you feel you have been retaliated against for making a complaint or participating in a Company investigation.

### **Violations of this Policy**

Any employee, regardless of position or title, whom the Company determines has subjected an individual to discrimination, harassment or retaliation in violation of this policy will be subject to discipline, up to and including termination of employment.

### **ACKNOWLEDGMENT**

By signing below, I acknowledge that I have received, read and understand WD's Discrimination, Harassment and Retaliation Prevention Policy dated March 2016.

Name

Ibrahim Rupawala

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Please enter your **system password** as your electronic signature.

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