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About EthicsPoint

What is EthicsPoint?

The EthicsPoint system is a comprehensive and confidential reporting tool created by NAVEX Global to help management and employees work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

EthicsPoint is an independent company that provides secure, confidential telephone and web-based systems for those who wish to report a concern. Western Digital is one of many public companies that contracts with EthicsPoint. Employees may feel more comfortable reporting a concern if they know they are reporting to a professional third-party, 24 hours a day, 365 days a year. The EthicsPoint system has interpreters and translators available in the primary languages spoken in all countries where Western Digital does business.

Why do we need a system like the EthicsPoint system?

- We believe that our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting channel to help address allegations of accounting and auditing fraud.
- An effective reporting system helps Western Digital foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With the EthicsPoint system, you have the ability to file a confidential report either by telephone or via the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report an issue if they have a reason to believe or suspect illegal activity, or a violation of a company policy or process. But the EthicsPoint system isn't just for reporting concerns. Employees may also use it to seek guidance on ethical dilemmas or ask questions.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

You certainly may do so if you prefer. There are multiple ways to report your concern that behavior may violate our Global Code of Conduct: your manager, another manager you trust, Human Resources, the Ethics and Compliance Department at Compliance@wdc.com, the Legal Department, or the EthicsPoint system. The decision is entirely up to you—the key is to speak up if you see something that doesn't seem right.

We recognize that some employees may feel more comfortable reporting the issue on the EthicsPoint system—you do not need to inform your manager if you choose to use this option. This is one of the reasons why we have partnered with EthicsPoint, namely so that you can report concerns and not have to keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner by letting the company know if someone is not behaving appropriately. As the Global Code of Conduct explains, "We all have an obligation to speak up if we see something that doesn't look right." By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten our reputation and the livelihood of the entire company.

Does management really want me to report my concern?

Yes. In fact, we *need* you to report your concern, and our Global Code of Conduct makes it an obligation for each of us to report misconduct if we see it.

You know what is going on in our company—both good and bad. You may have initial knowledge of an activity that is cause for concern. Your reporting can minimize the potential negative impact, and help us solve minor problems before they become bigger ones. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint's system's secure server to prevent any possible breach in security. The EthicsPoint system makes these reports available to only a small, select team including those employees in the Ethics and Compliance Department who are specifically tasked with evaluating the report. They evaluate reports based on the type of policy violation and location of the incident. Each report recipient has been trained in keeping these reports confidential to the extent possible.

Isn't this system just an example of someone watching over me?

Not at all. The EthicsPoint system is a positive aspect of our overall philosophy, and allows us to assure we all have a safe, secure, and ethical workplace. You should use it to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace, and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website my PC connects with. Won't this log identify me as a report originator?

No attempt will ever be made by any of the select individuals at the Company with access to helpline reports to use IP data (or other information) to try to identify an anonymous reporter. Moreover, you have the option of using a computer and network outside our work environment (such as your home computer) to access the EthicsPoint system's secure website. EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the EthicsPoint system is ever created. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

Can I file a report from home and still remain anonymous?

Yes. A report from your home or any Internet portal will remain secure and anonymous, guaranteed. An Internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away Internet addresses so your anonymity is always maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide the EthicsPoint system will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous then you — as a reporting party — need to ensure that what you write in the report does not accidentally reveal your identity. For example, "From my cube next to Jan Smith..." or "In my 33 years working for the company..."

Is the toll-free telephone Helpline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report, and an interviewer who speaks your language will type your responses into the EthicsPoint system. These reports have the same security and confidentiality measures as the internet-reports.

What if I want to be identified with my report?

That is easy to do. There is a section in the report where you can provide your name and contact information.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts Western Digital and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly minor lapse in ethics can have on an otherwise healthy company. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your co-workers to report it. Here is what our Code of Conduct says: "We all have an obligation to speak up if we see something that doesn't look right."

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

Speak up and file a report. The EthicsPoint system can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

Managers will not receive a copy of any EthicsPoint system report. The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report on the EthicsPoint system's website or through the EthicsPoint system's Call Center, you will receive a unique report key and are asked to create a password. This allows you to return to the EthicsPoint system again, either by Internet or telephone, to access the original report and add more detail or to simply check status. This is also the method you would use to answer questions asked by a company investigator – sometimes we request further information to help resolve open issues. We ask that you return to the site within the timeframe specified to respond to any follow-up questions. If you have chosen to stay anonymous, this will allow us to have an "anonymous dialogue" where situations are not only identified but can also be resolved, no matter how complex.

Are these follow-ups reports as secure as the initial report?

Yes. All EthicsPoint system correspondence is held in the same confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint system's toll-free Helpline, which is available 24 hours a day, 365 days a year. On the landing page, please click the tile called "Report a Concern by Phone," which will provide you with the telephone number to call from your location.