

Company Name Western Digital
Industry ICT (Own operations and Supply Chain)
Overall Score 26.5 out of 100

Theme Score	Out of	For Theme
2.7	10	A. Governance and Policies
7.4	25	B. Embedding Respect and Human Rights Due Diligence
7.0	20	C. Remedies and Grievance Mechanisms
4.1	25	D. Performance: Company Human Rights Practices
5.3	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company 'is committed to respecting human rights throughout the world'. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The Company's human rights 'commitment is based on internationally recognized human rights and related standards, as outlined in [...] the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.' However, 'based on' is not considered a formal commitment according to CHRB wording guidelines. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: See above [Human Rights Policy, 24/03/2021: documents.westerndigital.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Company has a commitment to the ILO Core: The Company's 'commitment is based on internationally recognized human rights and related standards, as outlined in [...] the ILO Declaration on Fundamental Principles and Rights at Work'. However, 'based on' is not considered a formal commitment according to CHRB wording criteria. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] Not Met: Company has an explicit commitment to All four ILO Core: The Company prohibits discrimination, forced labour, child labour and states that it 'supports workers' rights to associate freely and to bargain collectively, where not prohibited by local laws'. However, in relation to these last two, It is not clear whether it is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'where not prohibited by local laws'. [Human Rights Policy, 24/03/2021: documents.westerndigital.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: As indicated below, it is not clear whether all ILO core areas are respected in all contexts and locations. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] • Not Met: Company explicitly list All four ILO for suppliers: The Supplier Code of Conduct covers non-discrimination, child and forced labor. Regarding the rights to freedom of association and collective bargaining it indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Code conduct states that 'our Company is committed to effective safety and wellness programs that focus not only on accident prevention, but also on employee productivity and morale. This means: follow site safety rules, use necessary safety equipment and report actual or potential safety hazards'. [Global Code of Conduct, update 2020, 04/2020: documents.westerndigital.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company's states: 'We limit work hours to sixty hours per week or less, including overtime, except in emergency or unusual circumstances. Workers also receive at least one day off per seven-day work period'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: It indicates its suppliers' expectations regarding health and safety: 'Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace'. It then lists its health and safety standards, that include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company's Supplier Code of Conduct indicates that 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Responsible mineral sourcing: The Company states: 'Western Digital is committed to supporting responsible sourcing of conflict minerals [...] from the DRC region (including conformant smelters within the DRC) and other conflict-affected or high-risk areas'. [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com] • Met: Based on OECD Guidance: The Company indicates: 'Western Digital conducts due diligence in line with OECD Guidance'. [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The Company states: 'Western Digital expects its suppliers to comply with its requirements relating to conflict minerals and responsible sourcing. This means (1) any 3TG necessary to the functionality and production of supplied materials do not directly or indirectly: (a) finance armed groups through mining or mineral trading in the DRC, adjoining countries or other conflict-affected or high-risk areas, or (b) contribute to child labor, human rights abuses or environmental pollution'. [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to follow OECD Guidance for all minerals: The Company indicates: 'Western Digital is committed to supporting responsible sourcing of conflict minerals (gold, columbite-tantalite (also known as coltan), cassiterite, and wolframite, as well as their derivatives, tin, tantalum and tungsten (collectively 3TG)), cobalt and other minerals from the DRC region (including conformant smelters within the DRC) and other conflict-affected or high-risk areas'. [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com] • Met: Suppliers expected to make similar requirements of their suppliers: The Company indicates: 'Western Digital further expects its suppliers to adopt policies based on OECD Guidance with respect to 3TG, cobalt and other minerals in support of this policy and, throughout the supply chain, to require their suppliers to adopt similar policies'. [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com]
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights: The Company 'is committed to respecting and protecting the human rights of minorities and historically marginalized populations, including women, children, migrants and others, and endorses the principles set forth in the Convention on the Elimination of All Forms of Discrimination Against Women'. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Met: Expects suppliers to respect at least one of these rights: The Company's Supplier Code of Conduct indicates: 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including (...) migrant (...) and any other type of worker'. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: As above, the Company endorses the Convention on the Elimination of Discrimination Against Women. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: The Company commits to remedy: It indicates: 'If Western Digital learns of human rights abuses or other conduct contrary to our policies committed by our employees or suppliers, we take remedial action proportionate to the offense. Such remediation may include conducting an investigation, coordinating a corrective action plan, requiring additional audits (suppliers only), or possible suspension or termination of the relationship'. [Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment

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	rights defenders		Score 2 • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board level responsibility for HRs: The company states in its Global Human Rights Policy that 'The Board of Directors' Governance Committee oversees our corporate responsibility and sustainability policies and program, including this Global Human Rights Policy. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board/Committee review HRs strategy: The Company indicates that the Governance committee (each committee) regularly receives 'updates about the company's overall sustainability initiatives and performance. The Governance Committee is responsible for assisting our Board in overseeing our corporate responsibility and sustainability programs. The committee provides Board-level input on our social, environmental and human rights policies and programs'. However, no further details found. This subindicator looks for practical evidence of how it does so (specific processes in place to discuss human rights such as who briefs the Committee, periodicity of meetings, how it makes decisions, etc.) [2021 Sustainability Report, 2021: documents.westerndigital.com] • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 • Not Met: Meets both requirements under score 1 • Met: Example of actions decided: As an example and response to its assessment the company indicates that ' We partnered with BSR, a global non-profit organization, to complete an independent human rights impact assessment (HRIA) of our footprint and business model. Western Digital plans to use the results from this assessment to refine human rights policies, procedures and practices to enhance our protection of human rights and to mitigate potential risks.' [2021 Sustainability Report, 2021: documents.westerndigital.com]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making: The Company has a Sustainability Working Group whose activities include human rights initiatives. However, it is not clear if this is a senior level body to which overall responsibility for human rights has been allocated. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Global Human Rights Policy states 'Our Corporate Sustainability team has day-to-day responsibility for implementing this policy. Our Human Resources function enforces the policy within our workforce, and our Supply Chain Management function enforces it throughout our supply chain. Human rights initiatives and activities are managed by a cross-functional Sustainability Working Group including representatives from Corporate Sustainability, Human Resources, Supply Chain Management, Quality, Operations, Sales, and Ethics and Compliance'. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company indicates: 'Our periodic enterprise-wide risk assessments specifically cover forced and child labor. These assessments consider risks associated with the types of operations we have and the locations in which they are located, amongst other factors. They help us ensure our practices are aligned with our deep commitment to protect the rights of our workforce and create a positive and safe working environment for everyone. We have internal processes to manage any human rights or labor-related risks discovered through risk assessments or audits by developing targeted corrective action plans and tracking our progress against them'. The Company also states 'Our risk assessments take into account where the company does business, our customer types, our internal procedures and current circumstances at the time of the assessment (for example, high pressure, trade tensions, and others). They also include testing multiple variables, controls and triggering events, allowing us to understand where to properly deploy resources most effectively.' Additionally, in the Risk Factors section of the Annual Report, the Company describes the following risks: 'Our operations, and those of certain of our suppliers and customers, are concentrated in large, purpose-built facilities, subjecting us to substantial risk of damage or loss if operations at any of these facilities are disrupted.' This includes 'localized labor unrest or other employment issues'. Additionally, it discloses 'We are subject to state, federal and international legal and regulatory requirements, such as [...] labor, [...] health, safety, [...] and industry and coalition standards, such as those established by the Responsible Business Alliance ("RBA"), and compliance with those requirements could cause an increase in our operating costs and failure to comply may harm our business'. [2021 Sustainability Report, 2021: documents.westerndigital.com] & [10K Report 2019, 27/08/2020: investor.wdc.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company discloses that it sets 'forth expectations for all Western Digital employees in our Global Code of Conduct—published in 11 languages—on which all employees receive annual training'. The Code includes human rights commitments. [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] & [Global Code of Conduct, update 2020, 04/2020: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Company 'regularly communicates these requirements throughout its supply chain. For example, each year we require our highest-volume and highest-risk suppliers to

Indicator Code	Indicator name	Score (out of 2)	Explanation
	to business relationships		<p>reiterate—in writing—their commitment to human rights protections'. The supplier code states that 'participants shall adopt or establish a management system whose scope is related to the content of this code'. It also requires 'a process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, supplies and customers'. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual: Although the Human Rights policy and the Conflict mineral policy includes requirements for suppliers, no evidence found of supplier requirements being contractual (to comply contractually with human and labour rights). [Human Rights Policy, 24/03/2021: documents.westerndigital.com] & [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com] • Not Met: Company requires suppliers to cascade down to their suppliers: Although the supplier code requires 'a process to communicate Code requirements to suppliers [Company's indirect suppliers] and monitor supplier compliance to the Code, it is not clear if there's contractual obligation for suppliers to do so (as it is not clear whether the Company's direct suppliers are contractually bonded to comply the code). [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com]
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a • Met: How workers are trained on HR policy commitments: The Company discloses that it sets 'forth expectations for all Western Digital employees in our Global Code of Conduct—published in 11 languages—on which all employees receive annual training.' The Code includes relevant human rights commitments. [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] & [Global Code of Conduct, update 2020, 04/2020: documents.westerndigital.com] • Met: Trains relevant managers including procurement: The Company indicates in its 2018 Sustainability Report: 'We provide training to managers and employees with direct responsibility for managing Western Digital's supply chain requirements, including the RBA Code of Conduct requirements'. Additionally, in its latest Sustainability Report, 'Western Digital's Audit Committee requires senior members of management and several thousand designated key employees worldwide to complete an annual online questionnaire certifying compliance with the provisions of the Global Code of Conduct and making necessary disclosures'. [2018 Sustainability Report, 2019: documents.westerndigital.com] & [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates that 'we monitor our human rights and labor practices in both owned and supplier facilities through audits and risk assessments. The RBA requires audits of factories generating finished goods biennially, and these thorough reviews of our facilities and practices help us maintain high standards for protecting our employees'. [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] • Met: Proportion of supply chain monitored: The Company discloses that '96% of Tier 1 suppliers representing the top 80% of supplier spend audited in the RBA Validated Assessment Program during 2019'. Additionally, 'Starting in 2020, we are expanding the scope of our supplier self-assessments to include suppliers representing 90% of our cumulative spend, plus strategic and single-source suppliers' facilities.' [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process • Met: Disclose findings and number of corrective action: The Company indicates the following: 'If we are made aware of a labor issue or other problem in our supply

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>chain, whether through an audit, a reported grievance, or through contact with NGOs, we immediately work with the supplier to address the issue. We require timely correction of non-conformance issues and closely follow up with suppliers. [...] We have at times found violations of our policy against recruitment fees, which we have worked quickly to remediate. Last year, we became aware that a common supplier of Western Digital and other RBA members had violated that policy, and we worked to educate the supplier about our expectations and to change practices. That supplier has subsequently been audited, with a particular focus on the supplier's labor standards and recruitment of foreign workers. This resulted in a reimbursement of nearly USD \$3.3 million in recruitment fees to the supplier's workers. We have also required the supplier to audit the labor brokers in the migrant workers' home country. We continue to work closely with this supplier to ensure the changes made are effective and permanent, and we are using this experience as a case study with our other suppliers.' [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com]</p>
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers • Met: HR affects on-going supplier relationships: The Company discloses that if it 'learns of potential human rights abuses or other conduct contrary to our policies committed by our employees or suppliers, we take remedial action proportionate to the offense. Such remediation may include conducting an investigation, coordinating and tracking progress against corrective action plans, requiring additional audits (suppliers only), or possible suspension or termination of the relationship'. [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements: The Company indicates the following: 'If we are made aware of a labor issue or other problem in our supply chain [...] we immediately work with the supplier to address the issue. We require timely correction of non-conformance issues and closely follow up with suppliers. [...] We have at times found violations of our policy against recruitment fees, which we have worked quickly to remediate. Last year, we became aware that a common supplier of Western Digital and other RBA members had violated that policy, and we worked to educate the supplier about our expectations and to change practices'. In addition, the Modern Slavery statement indicates that 'We have actively participated in the Responsible Labor Initiative (RLI) [...] Through the RLI, we discuss best practices, collaborate with peers to develop cross-industry standards for health and sustainable working conditions, and utilize shared resources to monitor our own practices and the practices of our supply chain'. However, this indicator looks for evidence of the Company working proactively, in specific actions with suppliers to improve their performance in relation to human rights. Current evidence found refers to non-compliance corrective process and work conducted with multi-stakeholders initiatives, which is not clear how it translated in specific actions that the Company conducted with suppliers. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com] & [Modern slavery and Human Trafficking Statement, FY2021, 10/2021: documents.westerndigital.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Modern slavery statement indicates that the Company conducts HRIAs 'from time to time, consistent with the UN Guiding Principles on Business and Human Rights, to evaluate and address potential human rights impacts of our business. For example, in FY2021 we partnered with BSR, a global nonprofit, to conduct an independent analysis of Western Digital's potential human rights impacts from our footprint and business model. In addition, our periodic enterprise-wide risk assessments specifically cover forced and child labor. Those assessments consider risks associated with the types of operations we have and the locations in which they are located, amongst other factors'. The sustainability report also adds that this global human rights impact assessment 'included input from both internal and external stakeholders, analyzed potential upstream, operational and downstream human rights impacts of our business'. [Modern slavery and Human Trafficking Statement, FY2021, 10/2021: documents.westerndigital.com] & [2021 Sustainability Report, 2021: documents.westerndigital.com] • Met: Identifying risks through relevant business relationships: See above. Global process that included both own operations and supply chain. [2021 Sustainability Report, 2021: documents.westerndigital.com] & [Modern slavery and Human Trafficking Statement, FY2021, 10/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: See above. The Company conducted a global assessment in 2021, in collaboration with BSR, and including 'input from internal and external stakeholders'. [2021 Sustainability Report, 2021: documents.westerndigital.com] & [Modern slavery and Human Trafficking Statement, FY2021, 10/2021: documents.westerndigital.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: 'Taking into account Western Digital's unique geographical footprint, industry and business model, we have identified the following four issues as priorities for our company: (1) creating a respectful and inclusive workplace; (2) maintaining fair working conditions and compensation; (3) preventing modern slavery, human trafficking and child labor; and (4) supporting freedom of association and movement. These priorities may evolve over time, consistent with the results of our human rights impact assessments'. In addition, For example, in FY2021 we partnered with BSR, a global nonprofit that works with its network of over 250 member companies to build a just and sustainable world, to conduct an assessment. This HRIA was an independent analysis of Western Digital's potential human rights impacts based on our footprint and business model. The risks identified were consistent with our expectations and with risks common within our industry, including forced labor and health and safety, especially in our supply chain.' [2021 Sustainability Report, 2021: documents.westerndigital.com] • Met: How process applies to supply chain: As above. [2021 Sustainability Report, 2021: documents.westerndigital.com] • Not Met: Public disclosure of the results of HR assessment: Although the company indicates it has conducted a HRIAs, no information was found on the results. The company state ' We are preparing to use the results and recommendations from the assessment to enhance our policies, procedures and practices to mitigate potential risks.' [2021 Sustainability Report, 2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HR issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company 'provides multiple avenues for employees to speak up concerning conduct contrary to our policies, including human rights violations, with the option to report concerns directly to their manager, Ethics & Compliance, Human Resources or Legal, or through our global Ethics Helpline. The Helpline, which is run by a third party, supports anonymous reporting, is available 24 hours a day in roughly 150 languages, and is available online or by phone in local operating areas. We offer the Helpline to anyone who suspects human rights abuses or other misconduct, whether employed by Western Digital or not.' [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: As above, the Helpline is available in roughly 150 languages. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: Although the company indicates that 'Western Digital provides multiple avenues for employees to speak up concerning conduct contrary to our policies, including human rights violations, with the option to report concerns directly to their manager, Ethics & Compliance, Human Resources or Legal, or through our global Ethics Helpline.' The helpline is open to anyone. In addition, the supplier code requires 'ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on violations against practices and conditions covered by this Code'. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] & [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] • Met: Expect Suppliers to convey expectation to their own suppliers: the supplier code requires 'ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on violations against practices and conditions covered by this Code'. The supplier code also requires 'a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code'. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Helpline is available to 'anyone who suspects human rights abuses or other misconduct, whether employed by Western Digital or not'. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Helpline is available online and in roughly 150 languages. However, no further information on how stakeholders are made aware of it [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Met: Communities access mechanism direct or through suppliers: Although the company indicates in its Global Code of Conduct that 'The Ethics Helpline has local operators available in all the languages where we do business and you can find your local telephone number on the Ethics and Compliance intranet space.' The company grievance channels are open to all. The Company states that 'Western

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Digital also has an Ethics Helpline that is available for employees, suppliers and other stakeholders in the supply chain to raise concerns'. [Global Code of Conduct, update 2020, 04/2020: documents.westerndigital.com]</p> <ul style="list-style-type: none"> • Met: Expect supplier to convey expectation to their own suppliers: The supplier code requires to have 'Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on violations against practices and conditions covered by this Code it also requires 'a process to communicate Code requirements to suppliers and to monitor supplier compliance code'. The Company states that 'Western Digital also has an Ethics Helpline that is available for employees, suppliers and other stakeholders in the supply chain to raise concerns'. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] & [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial,etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Helpline is available to anyone, and the Company 'takes all reports seriously and absolutely prohibits retaliation against anyone for raising a concern in good faith'. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] & [Global Code of Conduct, update 2020, 04/2020: documents.westerndigital.com] • Met: Practical measures to prevent retaliation: The Company indicates: 'The Helpline, which is run by a third party, supports anonymous reporting, is available 24 hours a day in roughly 150 languages, and is available online or by phone in local operating areas.' [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: Although the supplier code and the sustainability report includes information about non retaliation against anyone who reports possible violations, this subindicator refers to explicitly committing to not retaliate in the specific forms required by the subindicator (firing, legal action, threats to claimants or their lawyers). • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company's own channel includes a non-retaliation commitment. The Company states that 'Western Digital also has an Ethics Helpline that is available for employees, suppliers and other stakeholders in the supply chain to raise concerns'. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] & [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company describes the following case in its supply chain: 'We have at times found violations of our policy against recruitment fees, which we have worked quickly to remediate. Last year,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>we became aware that a common supplier of Western Digital and other RBA members had violated that policy, and we worked to educate the supplier about our expectations and to change practices. That supplier has subsequently been audited, with a particular focus on the supplier's labor standards and recruitment of foreign workers. This resulted in a reimbursement of nearly USD \$3.3 million in recruitment fees to the supplier's workers. We have also required the supplier to audit the labor brokers in the migrant workers' home country. We continue to work closely with this supplier to ensure the changes made are effective and permanent, and we are using this experience as a case study with our other suppliers.' [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com] & [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy: The company indicates that 'Western Digital works closely with several partners to reduce the risk of forced labor. We continue to work closely with our suppliers and the RBA to audit practices to ensure suppliers are at all times following appropriate recruiting practices and that any necessary reimbursements are promptly provided to impacted employees. When we have found issues regarding recruitment fees, we have worked quickly to remediate them.' However, there is no description about monitoring implementation of the remedies itself. [2021 Sustainability Report, 2021: documents.westerndigital.com] • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: The Company discloses 'We compensate workers fairly and in accordance with all applicable laws, including those relating to minimum wage, overtime, and legally mandated benefits.' However, it is not clear if the Company pays a living wage, that is, enough for the worker and dependents or family, plus some discretionary income. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: Although the company states in its Supplier Code of Conduct that 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.' There is no mention and description to living wage. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes: The company indicates that 'We compensate workers fairly and in accordance with all applicable laws, including those relating to minimum wage, overtime, and legally mandated benefits. Western Digital workers are compensated for overtime at pay rates greater than regular hourly rates.' However, no information found regarding the practices adopted to pay suppliers in line with agreed timeline. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates that it has 14,445 suppliers in 92 sites and 80 countries. The report states that 'includes all direct and indirect material suppliers. Based only on location and count of sites/facilities with which we have a direct business relation'. [2021 Sustainability Report, 2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company 'prohibits the use of child labor.' In addition, 'Western Digital does not tolerate any form of modern slavery, human trafficking or child labor in our operations or supply chain. ' [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Age verification of workers recruited <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The Company indicates that suppliers must confirm adherence to no child labor, however, no further evidence found including procedures for age verification and for those cases where child labour is found. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com] • Not Met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Job seekers and workers do not pay recruitment fee: The Company indicates that 'For each pay period, our workers receive a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.' [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Met: Commits to fully reimbursing if they have paid: The Company indicates that 'For each pay period, our workers receive a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.' [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How practices are implemented and monitored for agencies, labour brokers or recruiters: The Company indicates 'We work closely and carefully with the labor brokers that source our manufacturing employees in Malaysia (the only location where we source employees from outside the country) and we prohibit labor brokers and their agents from collecting recruitment fees from prospective employees. We regularly audit the brokers' practices and only collaborate with brokers who strictly uphold our full commitment to fair labor practices. If we become aware of a labor broker who does not meet our high standards, we terminate the relationship with that broker.' [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com]
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Company indicates that 'Suppliers are required to comply with all relevant laws and adhere to the RBA Code of Conduct', which states 'forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used...workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com] • Not Met: How working with suppliers on debt & fees: In addition to the requirement expressed above, the Company states that 'we regularly communicate those requirements throughout our supply chain. For example, each year we require our highest-volume and highest-risk suppliers to reiterate in writing their commitment to human rights protections. We focus these efforts on direct material suppliers that represent the vast majority of our annual supplier spend, as well as contract manufacturers, single source suppliers, and other strategic or high-risk suppliers. For our indirect material suppliers, we require this annual recommitment of on-site suppliers, all labor brokers, and any suppliers of e-waste. In 2021, we required 219 direct material suppliers and 218 indirect material suppliers to confirm adherence to the following [...]'. However, no evidence found of proactive work conducted with them (i.e. capability building) to improve their practices in relation to recruitment fees elimination and ensuring full reimbursement to workers where relevant. [Modern slavery and Human Trafficking Statement, FY2021, 10/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time: The Company states 'for each pay period, our workers receive a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed'. However, no evidence could be found of the Company paying workers in full. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Met: Payslips show any legitimate deductions: The Company states 'for each pay period, our workers receive a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed'. 'Western Digital prohibits deductions from wages as a disciplinary measure'. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How these practices are monitored for agencies, labour brokers or recruiters: The Company indicates 'We work closely and carefully with the labor brokers that source our manufacturing employees in Malaysia (the only location where we source employees from outside the country) and we prohibit labor brokers and their agents from collecting recruitment fees from prospective employees. We regularly audit the brokers' practices and only collaborate with brokers who strictly uphold our full commitment to fair labor practices. If we become aware of a labor broker who does not meet our high standards, we terminate the relationship with that broker.' [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The company states in its Global Human Rights Policy that 'Western Digital will not hold, destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, except as may be required by law.' In addition, the company state 'When we hire employees to work in a different country, we provide them with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the workers' departure from their country of origin.' [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Company indicates that 'Suppliers are required to comply with all relevant laws and adhere to the RBA Code of Conduct', which states 'All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law'. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The company states in its Global Human Rights Policy that 'Western Digital supports workers' rights to associate freely and to bargain collectively, where not prohibited by local laws. Where no lawful and legitimate safety, privacy, or corporate asset protection issues exist, we prohibit unreasonable restrictions on workers' freedom of movement within our facilities or workers' freedom to enter or exit our facilities. We are committed to creating a workplace where employees feel comfortable raising questions and concerns.' However, it is not clear how the company works to avoid intimidation or retaliation. [Global Human Rights Policy, 24/03/2021: documents.westerndigital.com] • Not Met: Discloses % total direct operations covered by collective CB agreements Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The company presents in its Supplier Code of Conduct that 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, it is unclear whether this applies in all circumstances. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] • Not Met: How working with suppliers on FoA and CB

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The company presents a management approach for Health and Safety issues, risks and demands. As a result of that indicates three initiatives such as: 'Implementing and enforcing Western Digital's Environmental, Health, Safety and Security (EHS&S) Program requirements and leading by personal example. • Encouraging worker involvement in the structure and implementation of EHS&S Programs. • Communicating and assigning responsibility for EHS&S Program implementation and evaluating performance against H Health and Safety expectations.' [2021 Sustainability Report, 2021: documents.westerndigital.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The company discloses incident rate for the past three reporting period. The company reported a 0.04 for incident rate in 2021. [2021 Sustainability Report, 2021: documents.westerndigital.com] & [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] • Met: Discloses Fatalities for last reporting period: The company disclose zero fatalities for the past three reporting period. [2021 Sustainability Report, 2021: documents.westerndigital.com] & [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explain why not or what is doing to improve management systems
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company indicates that 'Suppliers are required to comply with all relevant laws and adhere to the RBA Code of Conduct', which sets out Health and Safety expectations on subjects including: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food and Housing; Health and Safety Communication. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020: westerndigital.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The Company reports figures regarding health and safety of employees and non-employee workers. However, no details found in relation to suppliers' employees • Met: Fatalities disclosures for lasting reporting period: The company reports zero fatalities for 'non employee workers for last reporting period.' [2021 Sustainability Report, 2021: documents.westerndigital.com] • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: The company indicates that it has 'design and evaluate workplace to eliminate hazards; create operating procedures and work instructions and provide control measures to different harzards,etc.' [2021 Sustainability Report, 2021: documents.westerndigital.com] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women • Not Met: Working conditions take account of gender

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Measures and steps to address gender pay gap at all levels of employment: The company indicates in its Sustainability Report that ' . Our most recent pay equity review, which we started at the end of fiscal year 2021, identified that women, after accounting for role, experience, location and performance, were paid 99.4 cents for every dollar earned by men. In the United States, we also review pay equity across race/ethnicity groups and found as a result of the latest review, after accounting for role, experience, location and performance, that non-white employees were paid 100.6 cents on every dollar earned by white employees. After identifying these gaps, we made pay adjustments to close all identified gaps. We will continue to review compensation and engage in a range of initiatives aimed at increasing diversity and ensuring equal pay and opportunity for all employees.' [2021 Sustainability Report, 2021: documents.westerndigital.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations • Not Met: Assesses ability to comply with its commitments when allocating work/targets Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The Company discloses that requires its suppliers and contract manufacturers that support the manufacture of Western Digital products to commit to and have policies and programs in place for complying with the Responsible Business Alliance (RBA) Code of Conduct and demonstrate that they have implemented an effective process to communicate the Code's requirements to their next tier suppliers. RBA code requires the following: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours. [Supplier Code of Conduct, 01/05/2022: documents.westerndigital.com] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on working hours • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Responsible Minerals policy states that 'Western Digital conducts due diligence in line with OECD Guidance' and 'further expects its suppliers to adopt policies based on OECD Guidance with respect to 3TG, cobalt and other minerals in support of this policy and, through the supply chain, to require their suppliers to adopt similar policies'. The Responsible minerals policy states that 'Western Digital's major production parts suppliers and contract manufacturers must meet additional requirements, including undergoing a Validated Assessment Program audit conducted by the Responsible Business Alliance. Western Digital requires contract provisions in support of this policy with its suppliers and contract manufacturers, which govern their relationships with refiners and smelters that contribute to Western Digital Products'. [Responsible Minerals Policy, 26/03/2021: documents.westerndigital.com] Score 2 <ul style="list-style-type: none"> • Not Met: Works with smelters/refiners and suppliers to build capacity

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: The Conflict minerals report states that as part of the supplier on-boarding process, we required that new suppliers acknowledge and comply with our Responsible Minerals Policy before we made purchases from them. Next, we asked the supplier to complete a Conflict Minerals Reporting Template [...] As part of our review, we checked whether smelters and refiners disclosed by suppliers processed types of metals contained in the components [..] <p>[2021 Conflict Minerals Report (SD Form), 26/05/2022: investor.wdc.com]</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The Company describes the process for identifying smelters and refiners, including annual survey that include the Conflict Minerals Reporting Template, then sorts these responses in a compliance software program to identify red flags, including potential covered country (high risk) sourcing. Also there's revision of these smelters against those referenced in the RMI Smelter database. Finally, it states that 'suppliers are categorized by internally-developed supplier risks levels, which assign risk across multiple criteria, including smelter or refiner status, red flags identified and the supplier relationship. Suppliers that are identified as being in higher risk categories are escalated in accordance with our risk mitigation procedures'. it is not clear, however, which are the risks identified by the Company (this indicator requires some disclosure of the potential risks faced by the Company). [Conflict Minerals Report, 31/05/2019: investor.wdc.com] • Met: Identification of smelter/refiners and OECD Guidance: See above. 'We also reviewed that information against the lists of conformant and active (or equivalent) smelters and refiners and country of origin information published by the RMI'. [Responsible Supply Chain: westerndigital.com] & [Conflict Minerals Report, 31/05/2019: investor.wdc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses smelters/refiners judged in line with OECD Guidance: The Conflict minerals report discloses a list of smelters and refiners, including RMAP Audit status (Conformant, Active) [2021 Conflict Minerals Report (SD Form), 26/05/2022: investor.wdc.com] • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes mineral risk management plan for supply chain: The Company indicates: 'Suppliers that are identified as being in higher risk categories are escalated in accordance with our risk mitigation procedures, which are described below: -We have procedures for monitoring and reporting on risk to designated senior management and the Audit Committee of the Board of Directors. Pursuant to these procedures, the findings of our compliance efforts in respect of 2018 were reported to senior personnel at our Company, including leadership for our 3TG compliance program, and the Audit Committee of the Board of Directors. -We have written risk management procedures, pursuant to which we sent requests to higher management levels in certain suppliers' organization where it was deemed advisable to encourage them to respond to our inquiries and to help incentivize suppliers to cooperate with our requests. Our risk management procedures provide for increasing levels of escalation to specified internal personnel and allow for a flexible response that is commensurate with the risks identified. In addition, to the extent that identified smelters and refiners were, according to the RMI information, neither conformant nor active, we worked through the RMI to encourage such smelters and refiners to become conformant, except where the smelters or refiners have, according to the RMI information, permanently or temporarily ceased operations. We also utilize information provided by the RMI to its members to monitor smelter and refiner improvement.' [Conflict Minerals Report, 31/05/2019: investor.wdc.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Forced labour • Headline: Cal-Comp Electronics accused of sourcing from recruitment agencies linked to systematic exploitation of migrant laborers in Thailand • Story: October 2018, Electronics Watch released a report which found that many migrant workers at Cal-Comp Electronic's manufacturing operations in Thailand remain at a heightened risk of exposure to conditions of forced labour. The report notes that despite changes undertaken by the company in 2016, migrant workers from Myanmar continue to report excessive recruitment fees, in excess of the 79 Euro limit they should have to pay under Myanmar regulations, which are being required by recruitment agencies in Thailand. The report notes that "In some cases workers have reported nearly €700 in recruitment related service fees or costs, equivalent to more than two months salary". A second report, released in February 2020, explains how the situation has improved throughout three years of monitoring and action taken by Electronics Watch and the Migrant Workers Rights Network. It states that while Cal-Comp was not able to control its recruiting agencies, since 2017 all workers controlled their own passports and work permits, they have received their contracts in their native languages, and had received partial reimbursement for their fees. By 2019, the company agreed to pay back all workers' fees who started at the company during or after January 2016. [Electronics Watch, 10/2018, "Compliance Report Update Cal-Comp Electronics, Thailand Brands: HP, Western Digital, Seagate Products: Printers, scanners, photocopiers, external hard disk drives, satellite boxes, other computer peripherals.": electronicswatch.org] [Electronics Watch, 02/2020, "Cal-Comp: A Lesson in the Importance of Worker-Driven Monitoring to End Forced Labour in Global Supply Chains": electronicswatch.org] [Business and Human Rights Resource Centre, 25/03/2019, "Thailand: NGOs allege ongoing recruitment fees & migrant worker abuses at supplier to global electronics brands; Incl. co. Responses": business-humanrights.org
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: The company disclosed the following in its Modern Slavery and Human Trafficking Statement for the FY2020: "Partnering closely with the RBA, we were made aware of 4 suppliers with reimbursement fee issues during FY2020. We worked with the RBA and other member companies to see that over USD 5.5 Million was reimbursed to employees within the supply chain. We continue to work closely with our suppliers and the RBA to audit practices to ensure suppliers are at all times following appropriate recruiting practices and that any necessary reimbursements are promptly provided to impacted employees." However, the information provided in the statement is not sufficient to clearly identify the cases it mentions. It is therefore not possible to conclude it is referring to the cases relevant for the allegation. <p>The company states that "In 2019, Western Digital along with other industrial colleagues successfully negotiated one supplier's full reimbursement of recruitment fees to over 9,000 migrant workers in Thailand" in its Sustainability Report for FY2020. However, it is unclear if this refers to the same case mentioned in the allegation.</p> <p>In addition, the company provided feedback to CHRB, however, the evidence submitted contained no new information relevant for the assessment of this indicator. [Modern Slavery and Human Trafficking Statement, FY2020, 22/02/2021: documents.westerndigital.com] & [2020 Sustainability Report (FY2019), 2020: documents.westerndigital.com] Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: See above
E(1).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: In its feedback submission to CHRB the company points to a statement by RBA regarding the resolution of an employment fee issue in Thailand that involved some RBA members. However, the statement is unclear on the involvement of Western Digital and it can therefore not be assumed that the company was involved in the actions taken. The Company further states in its Modern Slavery statement that "Despite having clear policies and practices, the recruitment fee issue is one that can be difficult to uncover due

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to the reluctance of some workers to disclose overpayments. This is why we continue to engage in a dialogue with all employees and our suppliers and regularly work with third parties to audit our practices and our suppliers' practices. When we have found issues regarding recruitment fees, we have worked quickly to remediate them. Partnering closely with the RBA, we were made aware of 4 suppliers with reimbursement fee issues during FY2020. We worked with the RBA and other member companies to see that over USD 5.5 Million was reimbursed to employees within the supply chain. We continue to work closely with our suppliers and the RBA to audit practices to ensure suppliers are at all times following appropriate recruiting practices and that any necessary reimbursements are promptly provided to impacted employees.'</p> <p>[RBA, 17/12/2019, "RBA and New Kinpo Group Help 10,570 Migrant Factory Workers in Thailand With Nearly \$5M in Recruitment-Fee Reimbursements": responsiblebusiness.org] [Modern Slavery and Human Trafficking Statement, FY2020, 22/02/2021: documents.westerndigital.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provided remedy: Cal-Comp Electronics has agreed to compensate the affected stakeholders. According to a company spokesperson "the company ... has developed appropriate remediation plans for workers which has yielded substantial successes by including but not limited to the ongoing repayment of recruitment fees and costs to workers". The company did not provide details of the amount the workers would receive. [Reuters, 11/12/2019, "Thai electronics firm compensates exploited workers in rare award": reuters.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: Although remedy has been provided to 10,570 workers, Electronics Watch notes that the remedy is not complete, stating that "Ongoing monitoring by Electronics Watch and MWRN suggests that more than 1,000 workers employed in one legally separate division were bypassed and have not received compensation for the recruitment fees they paid as of the time of this writing. Tracking down former workers who are owed reimbursement is also an ongoing process in which MWRN and others who can communicate with former workers have a vital role." [Electronic Watch, 02/2020: electronicswatch.org] • Met: Remedy delivered: The Thomson Reuters Foundation has seen two payslips showing that Cal-Comp has started the payments. [Reuters, 11/12/2019: reuters.com] • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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