

Western Digital Corp.

TICKER
NAS:WDC

MARKET CAPITALIZATION
US\$26 billion

HEADQUARTERS
United States

DISCLOSURES

UK Modern Slavery Act: Yes

California Transparency in Supply Chains Act: Yes

TARGETS
None

OVERALL RANKING

35 out of **49**

([2018 Rank](#): 21 out of 40)

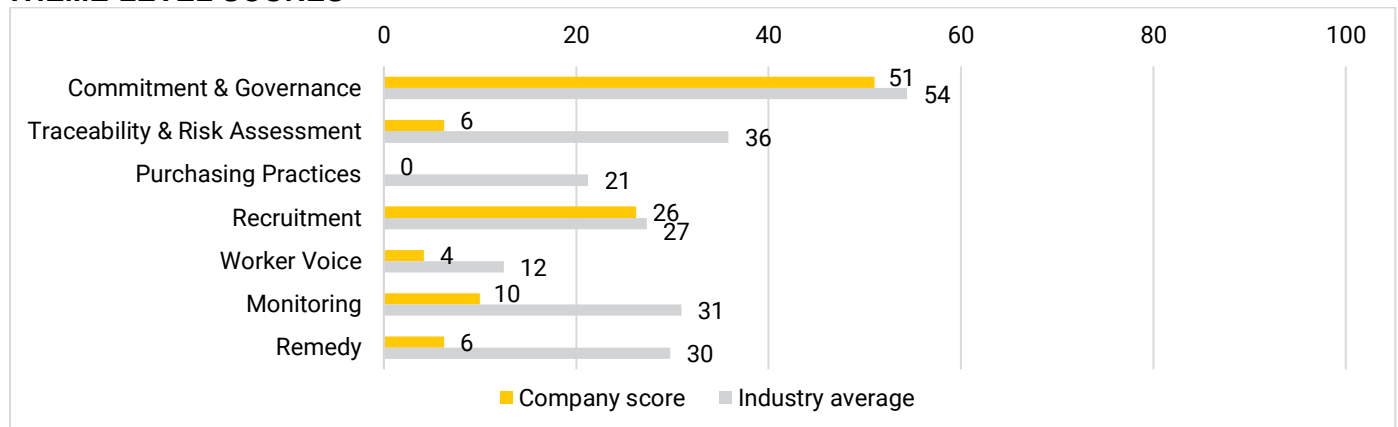
OVERALL SCORE

15 out of **100**

SUMMARY

Western Digital Corp. (Western Digital), a supplier to companies including Amazon and Apple, ranks 35th out of 49 companies and discloses less information on its forced labor policies and practices than its peers. Compared to 2018, the company's rank decreased by 14 points, as the company does not seem to have taken additional steps to strengthen its performance and disclosure. It also no longer discloses information on staff responsible for implementing its supply chain standards. The company's score is based mainly on its disclosure on the themes of Commitment and Governance and Recruitment. KnowTheChain identified one allegation of forced labor in the company's supply chains. The company does not disclose engagement with affected stakeholders nor remedy outcomes for workers. The company is encouraged to improve its performance and disclosure on the themes of Traceability and Risk Assessment, Purchasing Practices, and Worker Voice.

THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#). For additional disclosure provided after the finalization of the benchmark research, please see [here](#).

KEY DATA POINTS**SUPPLIER LIST**

No

NO-FEE POLICY

Yes (Employer Pays Principle)

AVERAGE SUPPLIER SCORE

N/A

REMEDY FOR SUPPLY CHAINS WORKERS

No

HIGH-RISK SOURCING COUNTRIESLikely from Malaysia and/or China¹

LEADING PRACTICES

None.

NOTABLE FINDINGS

Supply Chain Standards: Western Digital discloses that it uses the code of conduct of the Responsible Business Alliance (of which it is a member) as its supplier code of conduct. The code prohibits forced labor and requires the standards to be communicated to the next tier of suppliers.

Training: Western Digital reports that it trains its employees with direct responsibility for supply chains on the content of its supplier code of conduct.

Recruitment: The company's supplier code of conduct prohibits charging recruitment fees to its suppliers' workers and states that such fees must be repaid to workers where charged. The code also prohibits the retention of workers' personal documentation, such as passports.

OPPORTUNITIES FOR IMPROVEMENT

Traceability & Risk Assessment: The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. While the company is a member of the Responsible Mineral Initiative, and as such works on tracing its raw materials, it is encouraged to demonstrate a strong understanding of its supply chains by disclosing the names and addresses of its first-tier suppliers, the countries in which its below-first-tier suppliers operate, the countries from which it sources raw materials at high risk of forced labor, and data points on its suppliers' workforce.

Purchasing Practices: To address forced labor and human trafficking risks in its supply chains, the company is encouraged to integrate supply chain policies that include forced labor in its supplier contracts. The company may further consider assessing the risks of forced labor at potential suppliers before entering into any contracts with them. It may also choose to adopt purchasing practices that decrease the risks of forced labor and human trafficking, such as improving planning and forecasting or providing incentives (e.g., price premiums or increased orders) to suppliers to encourage or reward good labor practices.

Worker Voice: The company is encouraged to take steps to ensure that a formal mechanism to report grievances to an impartial entity regarding labor conditions in the company's supply chains is available and communicated to its suppliers' workers and relevant stakeholders (e.g., worker organizations or labor NGOs). Further, the company may consider disclosing data about the practical operation of the

mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism.

ENGAGED WITH KNOWTHECHAIN

No.

¹ Most electronic devices are produced at least in part in China and/or Malaysia, two countries where electronics may be produced using forced labor. KnowTheChain (June 2020), "[2020 KTC ICT Benchmark Report](#)."