

## Global Human Rights Policy

Sandisk Corporation (“Sandisk”) is committed to respecting human rights throughout the world. This policy, which has been adopted by our Board of Directors, sets forth Sandisk’s expectations for respecting human rights in our operations and supply chain.

Our commitment is based on internationally recognized human rights and related standards, as outlined in the UN International Bill of Human Rights (including the UN Universal Declaration on Human Rights), the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. Sandisk will adhere to these standards and will not knowingly participate in human rights abuses. Where local law conflicts with the aforementioned standards, Sandisk will comply with local requirements, while seeking ways to uphold the principles set forth in this policy.

### Governance And Policies

The Board of Directors’ Governance Committee oversees our corporate responsibility and sustainability policies and program, including this Global Human Rights Policy. The Board’s Compensation and Talent Committee reviews our human capital management policies, programs and initiatives, which cover company culture, talent development, employee retention, and diversity and inclusion. 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.

Employees of Sandisk each agree to respect human rights by following our [Global Code of Conduct](#), relevant global policies, country-specific policies and work rules, and factory-level policies. These policies reflect our commitment to treat others with dignity and respect. They adhere to applicable local labor laws and are consistent with the RBA’s Code of Conduct, including the commitment to prohibit and prevent child labor, to eliminate human trafficking and forced labor, and to employ fair recruiting practices and provide fair payment of wages. Sandisk also has a [Global Policy](#) on preventing harassment and discrimination that sets the tone for our expectation of a respectful workplace. We regularly train employees on our policies.

### Focus Areas

Taking into account Sandisk’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.

## **1. Respectful and Inclusive Workplace**

Sandisk commits to maintaining a respectful and inclusive workplace—one that is free from harassment, discrimination and corruption, and where employees know they can speak up if they experience or learn of misconduct.

- Sandisk does not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.
- Sandisk 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.
- Sandisk provides reasonable accommodation for religious practices of workers.
- Sandisk does not subject workers or applicants to medical tests or physical exams used in a discriminatory way.

As a global company with tens of thousands of employees, Sandisk understands that diversity enhances our opportunities for success. We seek out employees who have a unique worldview and who thrive in a collaborative and respectful work environment where everyone is valued and their contributions are welcomed. We are committed to creating a culture of belonging for all of our employees—all genders, races, ages, and other dimensions of diversity.

## **2. Fair Working Conditions and Compensation**

We prioritize the well-being of our workforce through policies and procedures that provide fair working conditions and compensation. This enhances workers' quality of life and improves the sustainability of our business. Sandisk works to exceed legal compliance. 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. We strictly prohibit all forms of harsh or inhumane treatment, including harassment and discrimination, sexual abuse, corporal punishment, mental or physical coercion, and verbal abuse of workers. Disciplinary policies and procedures in support of these requirements are defined in our local Work Rules and communicated to all employees.

We compensate workers fairly and in accordance with all applicable laws, including those relating to minimum wage, overtime, and legally mandated benefits. Sandisk workers are compensated for overtime at pay rates greater than regular hourly rates.

- Sandisk prohibits deductions from wages as a disciplinary measure.
- For each pay period, our workers receive a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.
- We work hard to ensure that any use of temporary, dispatch and outsourced labor is consistent with local laws or goes beyond legal compliance in providing protections to the workforce.

### **3. Modern Slavery, Human Trafficking and Child Labor**

Sandisk does not tolerate any form of modern slavery, human trafficking or child labor in our operations or supply chain. As explained in our annual Modern Slavery Compliance Statement, we have adopted diligence and remediation procedures to prevent and eradicate such inhumane activities.

Employment at Sandisk is always voluntary, so workers are free to terminate their employment. Sandisk will not hold, destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, except as may be required by law. 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. We prohibit substitution or changes in the employment agreement upon the workers' arrival in the receiving country unless the changes are made to meet local legal requirements and provide equal or better terms. We strictly prohibit recruitment fees, and if any such fees are found to have been paid by workers, we ensure they are promptly repaid to the impacted workers.

Sandisk prohibits the use of child labor. The term "child" refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. We support the use of legitimate workplace learning programs that comply with local laws and regulations.

- Sandisk ensures workers under the age of 18 do not perform work that is likely to jeopardize their health or safety, including night shifts or overtime.
- Sandisk maintains proper management of student workers through careful maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with all applicable laws and regulations.
- Sandisk provides appropriate support and training to all student workers.

### **4. Freedom of Association and Movement**

Sandisk 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.

## **Implementation**

### Due Diligence

To ensure this policy is effective, Sandisk will both proactively and reactively assess human rights-related risks and potential impacts in connection with our policies, practices and management approach. We conduct human rights due diligence and impact assessments at regular intervals and whenever appropriate based on circumstances or reports.

### Stakeholder Engagement

We are also committed to proactively engaging with internal and external stakeholders as we evaluate our impacts and work to improve the effectiveness of our human rights program.

#### Grievance Mechanisms

We work hard to foster a “speak up” culture, which encourages employees to openly communicate and share ideas and concerns with Sandisk management regarding working conditions and management practices. Sandisk 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 Sandisk or not. Sandisk does not tolerate retaliation against anyone who reports a possible violation in good faith or assists an investigation.

#### Remedies

If Sandisk 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.

#### Conclusion

This policy describes Sandisk’s expectations for respecting human rights within our operations and supply chain. We will communicate this policy to all relevant employees and suppliers. We will report progress on our human rights program in Sandisk’s Sustainability Report and via our corporate website.