

A close-up, high-angle view of solar panels, showing the grid lines and the blue surface of the photovoltaic cells.

SUSTAINABLE

Fiscal Year 2021 Global Citizenship Annual Report

A dense, lush green forest of tall evergreen trees, viewed from an elevated perspective.

DATASPHERE



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The Fiscal Year (FY) 2021 Global Citizenship Annual Report describes Seagate's approach to advancing sustainable and responsible business practices in all aspects of our products, services, employees, and operations. This report provides highlights, insight, and context for Seagate's FY2021 performance and goals for FY2022 and beyond.

Inquiries regarding this report or its contents should be directed to: social.response@seagate.com

Letter from Dave Mosley, CEO



“As a global hardware, software, and services company, Seagate understands our responsibility to lead by example and do good while doing well. Acting on our values of Integrity, Innovation, and Inclusion, we strive to advance sustainable solutions that transparently address critical environmental and social priorities. I am honored to present our Fiscal Year 2021 Global Citizenship Annual Report, and share the progress we continue to make towards advancing a more Sustainable Datasphere.

Seagate recognizes the gravity of climate change’s impact on the planet, and we remain committed to reducing our global carbon footprint. We are actively collaborating with industry peers and thought leaders to drive the innovation necessary to achieve that objective. Seagate commits to transparency with our stakeholders by being accountable to the United Nation’s Sustainable Development Goals (SDGs), Science-Based Targets (SBTs), Global Reporting Initiative (GRI) standards, and the Sustainability Accounting Standards Board (SASB) standards. These commitments are critical in helping Seagate target meaningful metrics relevant to the pressing issues affecting the world.

At Seagate, we seek to build circularity into every product and service that we release to the data market. We are applying our scale and influence to mobilize our customers, supply chain partners, and other technology companies to aid in this effort. We are modeling data storage’s impact on global warming and focusing on sourcing materials that address finite natural resources and their use, reuse, and substitution in our products. We are partnering with customers to advance our products’ secure erase, refurbish and reuse technologies.

The COVID-19 pandemic requires that we innovate our working methodologies within Seagate to best serve our customers. Our teams have sustained Seagate’s operations by adhering to safety protocols. They have also found novel solutions for challenges within our global supply chain and manufacturing operations. I take deep pride in the actions our suppliers and employees have taken together to ensure life safety, sustain business operations, and demonstrate our values of Integrity, Innovation, and Inclusion through this crisis.

We are continuing to elevate our business and industry by acting on our value of Inclusion. Gender and racial equity remain an important part of Seagate’s people-related policies and diversity, equity, and inclusion programs. Leaders at Seagate support these programs by endeavoring to ensure that all employees have a safe and professional work environment as well as opportunities for professional growth.

Seagate is a founding member of the Responsible Business Alliance (RBA) and a strong supporter of the United Nations Global Compact (UNGC). As such, we believe that all people are entitled to fundamental rights and freedoms. We strive to meet the highest standards of ethical conduct and to maintain strict systems and processes to ensure fair and ethical working conditions.

We commit to being both a global citizenship leader and advocate, transparent in our efforts and continually striving for improvement. In FY2022, we will be incorporating aspects of this commitment into our executives’ long-term compensation plans, based on the achievement of certain quantitative environmental (greenhouse gas reduction) and social (gender diversity) targets.



OUR VALUES: INTEGRITY, INNOVATION, INCLUSION

We recognize that businesses have the power and opportunity to make a difference in our world. We are a leader in sustainable and responsible practices to support our commitment to global corporate citizenship. We collaborate with key stakeholders and partners to achieve this shared vision. We live these commitments through our Value of Integrity.

Our values of Integrity, Innovation, and Inclusion inspire our global Seagate team, establish our priorities, underpin our decision making, and guide us in meaningful engagement with our stakeholders. As we look to FY2022 and the future, we will expand our reach and impact of these priorities. Thank you for partnering with Seagate on our journey toward a Sustainable Datasphere.

Global Citizenship Highlights



Seagate is proud to continue our decades-long tradition of sharing our environmental, social and governance (ESG) priorities, goals, and year-over-year accomplishments. However, we do not limit our definition of success to our efforts alone; we recognize Seagate can affect change at-scale and on a global level by being closely engaged with industry peers, customers, supply chain partners, governments around the world, and civil society. We believe we will make an exponential impact by working collectively toward common goals with these and other entities.

In FY2021, Seagate continued our leadership role in the Responsible Business Alliance (RBA): Seagate’s Senior Vice President of Business Sustainability and Transformation served as Chair of the Board and Executive Committee. In addition, Seagate employees lead and participate in the Assessments Workgroup, as

well as other RBA workgroups. Seagate also continued our partnership with industry organizations including the Clean Electronics Production Network (CEPN), the Responsible Minerals Initiative (RMI), IPC International Inc., and the International Electrotechnical Commission (IEC). All of these engagements help to advance sustainability efforts in the industry at a global scale.

To achieve our goals, we commit to continuous improvement and aligning to key standards provided by the International Organization for Standardization (ISO). We comply with the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB) standards, while targeting compliance with the Task Force on Climate-Related Financial Disclosures (TCFD) standards. The following section reflects highlights of our efforts over the past fiscal year. Please see subsequent sections for more details.



Environment

As a global company with seven manufacturing sites, Seagate recognizes our responsibility to address the environmental impacts of the data storage industry. Climate change is impelling us to reinforce our efforts to conserve energy and water, reduce greenhouse gases,

and lower the amount of hazardous waste we generate. Seagate's belief in our values of Integrity and Innovation guide us in making strong forward progress for the benefit of the planet. Here is a snapshot of advances we made in FY2021:



23K MWh

of electricity saved through energy conservation and efficiency initiatives in FY2021 – exceeding our conservation goal of 10,000 MWh for the year

210K MWh

of electricity saved since FY2014, the start of our energy conservation program

21%↓

reduction in Total Scope 1 and 2 market-based emissions intensity from CY2019 to CY2020

17%↓

decrease in hazardous waste generated per EB in FY2021

87%

non-hazardous waste diverted from landfills in FY2021

108

direct and packaging suppliers completed the RBA environmental survey in FY2021

9%↑

increase in water recycling in CY2020

6%↓

decrease in water withdrawal in CY2020

29%↓

decrease in water intensity (megaliter per EB) in CY2020



Climate and Energy

Seagate aligns with ISO standards as we implement and improve energy management systems. In FY2021, we received ISO 50001 Energy Management System certification for all seven of our manufacturing sites.

Our Scope 1 and Scope 2 market-based GHG (greenhouse gas) emission intensity per EB (Exabyte) was reduced to approximately 2,494 tCO₂e/EB (Tons of Carbon Dioxide Equivalent per Exabyte) in CY2020, compared to 3,156 tCO₂e/EB in CY2019. Seagate is making progress towards meeting Science-Based Targets, validated by Science Based Targets initiative (SBTi) in CY2019; our CY2017 baseline has been adjusted with the latest emission factors and assumptions in response to data availability, structural and methodological changes or updates.



Water Stewardship

Seagate recognizes that water is a critical natural resource, and we actively manage how water is used in our manufacturing processes and at our sites worldwide. An important aspect of Seagate's water stewardship strategy is implementing innovative approaches to the treatment and disposal of wastewater from our manufacturing sites.

Seagate has been named to CDP's Climate A List 2020, highlighting our leadership in managing for climate change and working towards reduced GHG emissions. We also received an A- in Water Security and were ranked as a Supplier Engagement Leader. More information on our climate change and water stewardship efforts and results can be found in Seagate's [CDP Climate Change Disclosure](#) and [CDP Water Security Disclosure](#).



Product Impacts and Circularity

Guided by our value of Innovation, Seagate is minimizing product impact by improving product quality and extending the useful life of our products. In FY2021, we continued our strategic partnership with Dell Technologies, completing a closed-loop aluminum recycling program that produced 24.7K new BarraCuda 3.5 2TB (Terabyte) drives from recycled material and recycled 39.4 metric tons of aluminum scrap.

Seagate also continued collaboration with Google that began in FY2020 on a circular component pilot in which the Voice Coil Magnet Assemblies (VCMA's) were successfully recovered from several thousand end-of-use Hard Disk Drives (HDDs) and reused in closed-loop manufacturing of new HDDs. In FY2021, a Life Cycle Assessment (LCA) analysis was conducted on an enhanced version of the process for recovery and closed-loop reuse of VCMA's. The LCA analysis also confirmed an 86 percent reduction in GHG emissions per VCMA set in the new drives as



Restricted Substances and Critical Materials

compared to the manufacture of a VCMA set from the linear extraction-manufacture process.

Seagate commits to meet or exceed restricted substance standards by adhering to global restricted substance legislation. This includes European Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and the Directive of the European Parliament and of the Council on the Restriction of the Use of Certain Hazardous Substances (RoHS) in Electrical and Electronic Equipment 2011/65/EU (RoHS) and amended by 2015/863/EU, among others. For FY2021, Seagate is now registered with the European Chemical Agency's (ECHA's) new public database of Substances of very high Concern in Products (SCIP). The SCIP database ensures that information on articles (articles are parts or subparts in an assembly that make up a finished product) containing Candidate List substances are available throughout the whole lifecycle of our products.

Social

Our diverse, global workforce enables Seagate's continued success as a data storage leader. We strive to cultivate a thriving culture among Seagate employees and the communities in which we operate. Our value of Inclusion underpins policies and practices that are designed to support a safe and respectful workplace by addressing the following:

diversity, equity, and inclusion; professional development; employee engagement; and employee health, safety, and well-being. In addition, Seagate strives to maintain an ethical workplace, uphold human rights, and adheres to all international standards. These practices allow all employees to engage and share in Seagate's success.



196K
hours of training completed in FY2021 by our employees

99%
of non-operator employees completed their goal-setting and year-end review processes, and created development plans in FY2021

160
different engagements and partnerships conducted in local communities in FY2021¹

100%
score from the Human Rights Campaign's Corporate Equality Index in FY2021 – for the third year in a row

\$122M
in FY2021 to supplier diversity spend (United States only)

2,300
global members representing 9 Employee Resource Groups and over 25 local chapters in FY2021

0
No cases of child labor² and no cases of forced labor³ were found in our operations in the FY2021 Responsible Business Alliance Validated Audit

89%
of eligible employees registered on the Career Discovery platform in FY2021, supporting internal mobility, employee engagement, and retention which reduces the time required to hire and onboard new employees.

¹ A decrease from previous years as some programs were suspended due to COVID-19.
² We have established age 18 as a standard minimum age for employment at all sites, which complies with or exceeds local legal requirements.
³ Our controls are designed to keep such cases at a low risk.

Diversity, Equity, and Inclusion

In FY2021, Seagate remained focused on building diverse talent pipelines through partnerships with minority engineering organizations and expanded our reach to the United States military and veteran communities. We continued to enhance our diversity training and education resources by increasing participation in our LGBTQ+ (Lesbian, Gay, Bisexual, Transgender, and Queer) Ally Training and our Neurodiversity 101 digital training. We continued our global unconscious bias program, including live and virtual workshops. Engaging with McKinsey’s Black Leadership Academy provided employees an opportunity to connect with industry peers and business leaders. We also joined PricewaterhouseCoopers’ CEO Action for Racial Equity Fellowship, mobilizing diverse talent and expertise from across industries. Seagate’s Diversity, Equity, and Inclusion report for FY2021 can be found [here](#).

Employee Development, Engagement and Retention

Seagate works to foster an environment that inspires and supports employee performance through rich conversations and coaching, continuous learning and development, and collaboration. We successfully launched our Leadership Essentials Program with the objective of equipping our leaders with the tools to foster employee growth.

Employee Health and Safety

The COVID-19 pandemic has shown us that Environment, Health, and Safety (EHS) reaches beyond traditional workplace health and safety. Seagate remains committed to our enhanced site controls to ensure the health and safety of our workforce while ensuring continuity of our business operations. Health and safety measures such as physical distancing, temperature and health screenings, masking

requirements, increased cleaning and disinfection, and contract tracing measures remain in place and are frequently assessed for their effectiveness.

Community Engagement

Seagate’s local programs support our communities and focus on Science, Technology, Engineering, and Mathematics (STEM). In FY2021, we reached a large audience and provided meaningful impact by partnering with Seagate employees, local community members, nonprofit partners, civic and academic institutions, and governments.

Supply Chain Due Diligence

We view our supply chain as an extension of our footprint. We have a responsibility to conduct due diligence to ensure our business partners manage their operations in a suitable way. Seagate has adopted the RBA Code of Conduct as our supplier code of conduct and expects our suppliers to manage their business in accordance with the RBA Code.



Business Continuity

Seagate is committed to investing in and protecting our operations and community from the many potential risks and threats that could affect our business. Throughout FY2021, we continued to mature our Business Continuity Management System (BCMS). This enabled effective management and mitigation of the various risks and threats to our business. Our BCMS encompasses four pillars of planning:

- 1 Business Continuity Planning
- 2 Incident Management
- 3 Crisis Management
- 4 Supply Chain Risk Management

In CY2020, our manufacturing sites in China and Thailand were audited and maintained their ISO 22301:2012 certifications.

In FY2021, Seagate continued to execute our global response to the dynamic COVID-19 pandemic. Our mature enterprise-wide crisis management structure, with input from site leaders, mitigated risk where possible and determined critical courses of action. These measures enabled the continuity of business operations. As health and safety remained our priority, the increased vaccine availability globally and the rollout of Seagate onsite vaccination clinics to our employees ensured another layer of protection from the impacts of COVID-19.

Governance

Our Corporate Governance standards and practices ensure Seagate’s longevity as a company. We are committed to being responsible to our stakeholders while upholding the highest ethical practices. The following reflects our ongoing commitments to transparency and accountability regarding **privacy, security, brand ethics, and compliance**. Seagate demonstrates our value of Integrity by executing our commitments in these areas.



Promoted the Seagate Ethics Helpline

to employees and business partners for raising ethics concerns.

Ensured Data Privacy Compliance

with new and evolving data privacy laws, as identified through internal assessments.

Determined there were no significant risks of corruption or non-compliance

in FY2021 through ethics risk assessments at our seven manufacturing sites, which comprise more than 86.6% of our global workforce.

Delivered Code of Conduct training

to 100% of non-operator employees in FY2021, with a 99.2% completion rate.

Initiated a new compliance and ethics training program

in FY2021 to engage and educate our business partners.

Established the Global Compliance and Ethics Council (GCEC)

in FY2021 to align Seagate business functions with Seagate’s corporate Compliance and Ethics Program strategy, policies, and procedures.

Compliance and Ethics, and Governance

Compliance and Ethics

Seagate’s Code of Conduct and global compliance and ethics programs, policies, and practices underpin our core value of Integrity. We educate, engage, and encourage our employees and those external to Seagate to share any ethical concerns through our reporting channels such as the [Seagate Ethics Helpline](#). By providing these channels, we empower our employees, customers, and other stakeholders to hold Seagate accountable and to act with Integrity.

guidelines demonstrate that the Board has the necessary authority and practices in place to review and evaluate Seagate’s business operations and make decisions independently of company management.

Corporate Governance

Seagate is governed by our Board of Directors (the Board). Our [Corporate Governance Guidelines](#) provide a framework for the Board to exercise its responsibilities to Seagate stakeholders. These

Data Privacy and Data Protection

We are committed to protecting all data within Seagate, including personal and confidential information of our employees, business partners and customers. We also comply with applicable data protection and privacy laws globally, including the European Union General Data Protection Regulation, Singapore Personal Data Protection Act, and the California Consumer Privacy Act.



02

About this Report

This report covers activities managed by Seagate Technology Holdings public limited company (plc), an Irish public limited company, from July 4, 2020 through July 2, 2021, our 2021 fiscal year.

References to “Seagate,” “we,” “us,” “our,” and the “Company” within this report refer to Seagate Technology Holdings plc and Seagate’s subsidiaries. References to “\$” are to United States (U.S.) dollars. There were no significant changes to Seagate’s size, ownership, or supply chain, in FY2021; therefore, we do not need to issue any restatements of information. References to our major locations are defined as locations that contain more than 500 Seagate employees.

This report is published annually. Previous Global Citizenship Annual Reports can be viewed and downloaded from the Seagate website at www.seagate.com, including last year’s FY2020 report, which covered Seagate’s financial reporting cycle from June 29, 2019 through July 3, 2020. The Seagate website contains supplementary information about our company’s history, products, values, management, and financial performance. More information, including our net sales and other financial disclosures, can be found in Seagate’s Annual Report on Form 10-K for the fiscal year ended July 2, 2021 and Quarterly Reports on Form 10-Q for the fiscal quarters ended December 31, 2021.

Cautionary Note Regarding Forward-Looking Statements

This report contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Forward-looking statements provide current expectations of future events based on certain assumptions and include any statement that does not directly relate to historical fact. Forward-looking statements include, among other things, statements about our environmental, social and governance priorities and goals and our efforts relating to our customers, suppliers and industry. Forward-looking statements generally can be identified by words such as “expects,” “intends,” “plans,” “believes,” “estimates,” “seeks,” “targets,” “projects,” “commits,” “should,” “may,” “will,”

“will continue,” “can,” “could” or the negative of these words, variations of these words and comparable terminology. The absence of these words or similar expressions does not mean that a statement is not forward-looking. Forward-looking statements are subject to various uncertainties and risks that could cause our actual results to differ materially. These risks and uncertainties include, but are not limited to, those described under the captions “Risk Factors” and “Management’s Discussion and Analysis of Financial Condition and Results of Operations” in the Company’s Annual Report on Form 10-K for the year ended July 2, 2021, and in the Company’s other filings with the United

States Securities and Exchange Commission (SEC). Undue reliance should not be placed on the forward-looking statements which speak only as of the date they were made. The Company undertakes no obligation to update or revise any forward-looking statements.

In this Global Citizenship Annual Report, the use of the term “materiality” and other similar terms refers to topics that reflect our priority ESG issues. Seagate is not using such terms as they are used under the securities or other laws of the United States or any other jurisdiction or as these terms are used in the context of financial statements and financial reporting.

Defining Report Content

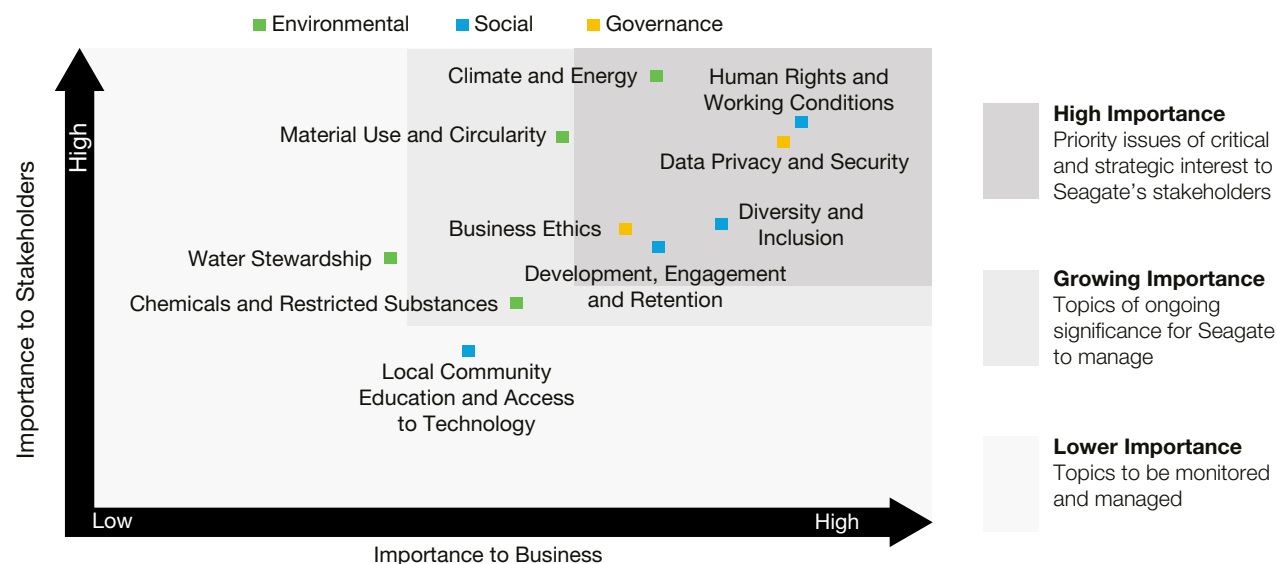
The Sustainable Datasphere: FY2021 Global Citizenship Annual Report follows the GRI's Sustainability Reporting Standards for applying the principles of materiality, stakeholder inclusiveness, sustainability context, and completeness for defining report content. This report has been prepared in accordance with the GRI Standards: Core option. In addition to following GRI Standards, this report also contains disclosures in accordance with the SASB, and certain TCFD standards. A list of the indicators and their locations can be found in the [Content Indexes](#) at the end of this report.

Additionally, as noted in last year's report, in FY2020, Seagate engaged a third-party to conduct a sustainability materiality assessment to identify, prioritize, and validate the aspects that are most significant to our business and our stakeholders. The assessment covered reviewing industry standards and external trends covering ESG topic areas. It also included speaking with both internal and external stakeholders to develop a comprehensive understanding of Seagate's significant impacts, where

those impacts occur, and how various issues may influence the assessments and decisions of stakeholders. No aspect was intentionally excluded from the scope of the assessment. The topics identified as material to our business are categorized into governance and ethics, product security and data privacy, product stewardship, environmental sustainability, our employees, supplier engagement, community engagement, and business continuity. These topics, along with stakeholder feedback gathered during the materiality assessment helped shape the content and structure of this report.

We review our sustainability materiality assessment annually. After our review in FY2021, we concluded that the assessment from FY2020 remained valid. We will continue to review business operations each year and conduct sustainability materiality assessments as needed. A breakout of findings and their sub-topics as well as policies that drive our commitment and compliance can be found [here](#).

Sustainability Materiality Assessment



Management Approach

Seagate maintains a structure of governance and continuous improvement through the implementation of Business Process Management (BPM) spanning all functional and value creation processes across our enterprise. Leveraging the structures and hierarchy of BPM, we develop and periodically review management documentation in Corporate Standard Operating Procedures (CSOP), processes, and work instructions for relevance, quality, and compliance. To ensure cross-functional alignment, we define, evaluate, and improve End to End Value Stream Processes on an ongoing basis. Seagate also continues to follow the ISO standards to ensure compliance with standards and a commitment to continuous improvement. Our performance metrics measure the effectiveness of the BPM program and ISO compliance in delivering intended results.

Through Seagate's internal audit program, we ensure that this management approach, processes, measurements, and controls are operating effectively in managing the risk and opportunities. Based on the performance metrics and internal audit results, we take actions to improve the programs. Economic, environmental, governance, and social programs are managed by the relevant functional departments, with oversight by senior management who report directly to the CEO. These include, but are not limited to, our Senior Vice President, Business Sustainability and Transformation; Senior Vice President and Chief Human Resource Officer; Senior Vice President, Chief Legal Officer; and the Executive Vice President of Operations and Technology.

SENIOR MANAGEMENT WHO REPORT TO THE CEO



Joan Motsinger
SVP, Business Sustainability and Transformation



Patricia Frost
SVP and Chief Human Resource Officer



Kate Schuelke
SVP, Chief Legal Officer



Jeff Nygaard
EVP of Operations and Technology

Restatements of Information

Seagate's FY2020 Global Citizenship Annual Report (GCAR) inadvertently included one error in the measurement units for Water Intensity Decreased. Liters per EB was the measurement referenced. The correct measurement was megaliters per EB. This error and its correction are relevant to the FY2020 GCAR, pages 15 and 56.



03

About Seagate

We are a leading provider of data storage technology and solutions.

Our principal products are hard disk drives, commonly referred to as disk drives, hard drives, or HDDs. In addition to HDDs, we produce a broad range of data storage products including solid state drives (SSDs), solid state hybrid drives (SSHDS) and storage subsystems, as well as a scalable edge-to-cloud mass data platform that includes data transfer shuttles and a storage-as-a-service cloud. All of these products offered are shipped under the Seagate, LaCie, and Maxtor brand names.

HDDs continue to be the primary medium of mass data storage due to their performance attributes, reliability, high quality, and cost effectiveness. Our HDD products are designed for mass capacity storage and legacy markets. Our HDD and SSD product portfolio includes Serial Advanced Technology Attachment (SATA), Serial Attached SCSI (SAS), and Non-Volatile Memory Express (NVMe) based designs to support a wide variety of mass capacity and legacy applications.



Mass capacity storage supports high capacity, low-cost per terabyte (TB) storage applications, including nearline, video and image applications, and network-attached storage (NAS). Legacy markets include mission critical, desktop, notebook, consumer, DVR, and gaming applications. Our systems portfolio includes storage subsystems for enterprises, cloud service

providers, scale-out storage servers, and original equipment manufacturers (OEMs). Engineered for modularity, mobility, capacity and performance, these solutions include our enterprise HDDs and SSDs. Our products and services are offered in the Americas, Asia Pacific (APAC), and Europe, the Middle East and Africa (EMEA).

We maintain a highly integrated approach to our business by designing and manufacturing a significant portion of the components we view as critical to our products, such as read/write heads and recording media.

Seagate is headquartered in Ireland; at the end of FY2021 we had 53 global sites, excluding surplus and subleased locations. Our seven manufacturing sites are located in China, Malaysia, Singapore, Thailand, the United Kingdom, and the United States. Our six R&D sites are located in India, Malaysia, Singapore, and the United States.

In FY2021, Seagate reported net revenue of \$10.7 billion USD and shipped 535 exabytes of HDD storage capacity.

More information can be found in our Annual Report on Form 10-K for the fiscal year ended July 2, 2021.

04



Compliance and Ethics, and Corporate Governance

Seagate's Code of Conduct serves as a guide for demonstrating Integrity and conducting ourselves legally and ethically every day and in every location where we conduct business.

Compliance and Ethics

Seagate's [Code of Conduct](#) is supplemented by our [Code of Ethics for Senior Financial Officers](#), both of which are publicly available on our website. We periodically evaluate and assess our Code of Conduct and related policies, programs, and processes for effectiveness and compliance with new laws and regulations.

Our Code of Conduct helps ensure a principles-based approach to our business activities. It summarizes Seagate's ethical standards and key policies across areas such as insider trading, conflicts of interest, anti-bribery and anti-corruption, privacy, confidentiality, anti-harassment and anti-discrimination, and antitrust and fair dealing. To promote awareness and understanding of the Code of Conduct, we make it available in the following eight languages: Chinese, English, French, Korean, Malay, Portuguese, Spanish, and Thai. Training on our Code of Conduct is provided annually to all non-operator employees and all new non-operator employees must promptly complete it when hired. The training is available in Chinese, English, French, Korean, Malay, Spanish, and Thai. We target 100 percent completion rate of these key compliance trainings.

Through Seagate's global Compliance and Ethics program (C&E Program), we have a centralized and coordinated approach to ensuring that there is a comprehensive system of policies, processes, and standards that prevent, detect, and correct violations of laws, regulations, and corporate policies. Our C&E Program reflects internationally accepted hallmarks of an effective compliance program, and we take a strategic, risk-based approach relevant to Seagate and our employees.

Seagate brings leaders from all key business functions together in our Global Compliance and Ethics Council (GCEC) to align with the C&E strategy, policies, and procedures. The GCEC was established in FY2021 and has geographic and operational reach throughout Seagate.

The C&E Program is further strengthened through deliberate cross-functional collaboration and consistent integration with key functional areas such as Human Resources, Business Sustainability and Transformation, Finance, and Sales. Through these partnerships, we continually build upon and enable a culture focused on a variety of areas of importance such as sustainability, and diversity, equity, and inclusion.

Our C&E Program focuses on key risk areas, which are assessed on an ongoing basis. Our [Anti-Bribery and Anti-Corruption Policy](#) requires all Seagate Board members, officers, employees, business partners, and suppliers to follow all applicable laws and regulations, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act. We provide training and awareness to employees as well as key business partners and customers on Seagate's

expectations in key areas such as anti-bribery, anti-corruption, antitrust, and fair competition.

Seagate conducts an ethics risk assessment bi-annually at our manufacturing sites against the Ethics section of the RBA Code of Conduct, which corresponds with Seagate's [Code of Conduct](#). In FY2021, there were no significant risks of corruption or non-compliance identified through any ethics risk assessment among our seven manufacturing sites, which together comprise more than 86.6 percent of our global workforce.

Seagate's [Code of Conduct](#), C&E Program, policies, processes, standards and values of Integrity, Innovation and Inclusion set the tone and framework for a strong culture of compliance and ethical conduct at Seagate. By working together, we empower our employees to act with integrity.

Corporate Governance

Seagate is governed by its Board of Directors and has adopted [Corporate Governance Guidelines](#) to clarify how it exercise its responsibilities. These guidelines demonstrate that the Board has the necessary authority and practices in place to review and evaluate Seagate's business operations

and make decisions independently of company management. The guidelines also elaborate on the processes by which shareholders may communicate with the Board. Additional information on our governance structure is available publicly in the [Governance section of our website](#).

Data Privacy and Data Protection

We are committed to protecting all data within Seagate, including the personal and confidential information of our employees and customers and other data that is shared with or received from third parties. We comply with all applicable international and local data protection and privacy laws and regulations such as the European Union General Data Protection Regulation (GDPR), the Singapore Personal Data Protection Act, and the California Consumer Privacy Act and changes to these regulations and emerging protection and privacy laws in the regions in which we operate.

Our global data privacy program has adopted a principles-based approach that incorporates the principles of the GDPR and the Fair Information Practice Principles (FIPPS) as the foundation for our comprehensive and holistic program. FIPPS are widely accepted concepts for fair information practices and data protection concepts that include accountability, security, data quality and integrity, use limitation, data minimization, purpose specification, individual participation, and transparency. Through cross-functional collaboration, we continue to build on this

foundation to comply with the global data privacy and protection laws applicable to our business, to protect the personal information entrusted to us, and to honor the privacy rights that have been granted to individuals worldwide.

Protection of the data entrusted to us is a top priority for Seagate. Our internal data protection program is led by a dedicated team that maintains a data classification scheme and framework for defining and implementing appropriate protection protocols for all data within Seagate. Through routine evaluation of the full data lifecycle – creation, storage, use, sharing, archival, and destruction – we stay informed of emerging risks and opportunities to implement additional safeguards. We implement stringent policies, precise processes, and robust technologies to safeguard Seagate's data and our partners' data from corruption, compromise, and loss. We seek to strike the right balance between the productivity required for smooth business operations and the data privacy and security controls necessary for effective data protection.



Product Security

Product security is at the forefront in our continual commitment to Integrity. As data becomes a larger contributor to the world’s quality of life, both its value and risk grow, increasing the need for data protection. Safeguarding our products and the data they house can only be achieved through a holistic approach to secure best practices at every phase of the product lifecycle. With rigorous product testing and the implementation of innovative security features such as **Instant Secure Erase (ISE)**, this multi-layered mitigation strategy offers an unequalled level of protection for businesses, governments, and individual consumers.

Seagate’s Product Security Office assures integrity in information systems using a structured process. Information systems that are critical to the integrity of the products’ security are routinely validated to comply with Seagate’s corporate IT policy and to meet ISO 20243 supply chain product security requirements. Product lines become ISO 20243 certified through a formal assessment by a third-party accredited laboratory.

We identify data security risks and vulnerabilities within products through a Product Security Test and Evaluation process. This includes performing security reviews to assess controls, architecture, and design, and to gauge cyber resilience via code scanning and penetration testing. Mitigation and/or remediation of the findings is governed via the controls in Seagate’s gated product development process to assure closure prior to release.

Global supply chains are vital to our business, and the security of our partners both upstream and downstream underlies our collective success. Minimizing the risks that affect both Seagate and our partners requires that we extend security to every stage, from product development and manufacturing to sourcing and delivery. We have implemented comprehensive product lifecycle standards and frameworks, including ISO certifications, to create safeguards for our business and our supply chain.



The integrity of global supply chains is more important than ever in our increasingly interconnected world. Minimizing risk requires aligning priorities among our sites, our critical suppliers, and our partners. With product life cycle standards and frameworks, including ISO certification, Seagate has established a uniform baseline of safeguards at every stage, including product development, sourcing, and manufacturing – key elements that provide comprehensive supply chain security.

Seagate deploys product security and privacy preservation measures by integrating security features on the drive itself, along with a trusted chain of custody in the reverse supply chain. This enables a circular economy of trusted technology that increases sustainability through the reuse, repair, and resale of products that would otherwise generate e-waste. These methods support our goal to increase the quantity of drives each year that re-enter circulation.

More information on product security can be found on our website [here](#).

Ethics Helpline and Reporting

Seagate's Ethics Helpline is available to both our employees and to those external to Seagate, with contact information available on the homepage of both our internal and external Seagate websites. Concerns may be reported by phone or email in English, Spanish, French, Chinese, Korean, Malay, Portuguese, or Thai. Throughout FY2021, we continued to promote our Ethics Helpline so that employees could confidentially and anonymously report illegal or unethical situations without any fear of retaliation.

Additional reporting channels are available for employees to address ethics and other concerns, and ongoing training encourages employee feedback and participation in local sites, management communications sessions, and employee "all hands" meetings with executives. Ethics concerns or questions about ethical and lawful behavior can be directed towards a supervisor, HR representative, or a [corporate compliance officer](#). Seagate encourages employee consultation and supports the ability of employees to address complaints without the fear of retaliation.



Public Policy Advocacy

As a diverse global company with operations, employees, customers, suppliers, and shareholders located around the world, we engage and interact with officials and government representatives in several different countries and municipalities. Seagate provides them with information about our company, industry, markets, technology, and other facets of our business. We do not directly or indirectly contribute corporate funds, either financial or in-kind, for the purpose of supporting candidates for political office, political parties, or to political action committees.

Seagate may actively engage in legislative and regulatory processes, including advocacy for certain policies that the company believes will facilitate productive economic growth, and are in the best interests of Seagate and Seagate's stakeholders.

Seagate's effort to interact with industry peers and stay informed of evolving policies, trends, technology developments, and regulations includes participation in several trade associations and related organizations. Some of these associations and organizations are categorized as 501(c) organizations under the United States tax code, and some may engage in public policy advocacy with the United States or other government entities. Seagate may make payments to these organizations, including membership fees and dues. However, Seagate's payments to, participation in, or membership with these trade associations and organizations does not mean that Seagate endorses or agrees with all of a particular group's policy objectives.

Below is a list of trade associations and organizations that received membership fees or payments from Seagate for or during FY2021:

- | | |
|---|--|
| Responsible Business Alliance | American Chamber of Commerce, Singapore |
| United Nations Global Compact | American Chamber of Commerce, China |
| United for Patent Reform | US-ASEAN Business Council |
| Clean Electronics Production Network | Federation of Thai Industries |
| Information Technology Industry Council | Singapore Business Federation |
| Silicon Valley Leadership Group | US-China Business Council |
| The Minnesota High Tech Association | United States Information Technology Office |
| Longmont, CO Area Economic Council | China Association of Enterprises with Foreign Investment |
| Longmont, CO Chamber of Commerce | US-India Business Council |
| Boulder, CO Chamber of Commerce | Londonderry Chamber of Commerce |
| Fremont, CA Chamber of Commerce | Northern Ireland Chamber of Commerce |
| American Chamber of Commerce, Thailand | Confederation of British Industry |
| American Chamber of Commerce, Malaysia | Irish Business and Employers Confederation |

LOOKING FORWARD: COMPLIANCE AND ETHICS, AND CORPORATE GOVERNANCE

In FY2022, Seagate's C&E Program will continue to grow, advancing into or expanding in areas such as sustainability, human rights, and diversity, equity, and inclusion. Guided by our value of Integrity, we continue to remain agile as we extend the reach and effectiveness of our C&E Program with innovative technologies and new initiatives. This will enhance our engagement with Seagate's employees and business partners. We will continue to act on our value of Integrity as a key part of our operating foundation.

05

Product Sustainability

Seagate takes a holistic view of how our products affect the environment and our communities, and works with an industry collective of our customers, suppliers, and peers to address that impact.



Our stakeholders specifically identified material use and circularity as topics of high interest in our sustainability materiality framework assessment. Our overarching goal for Seagate's Product Sustainability is to maximize our sustainable practices and minimize our impacts. This also enables Seagate to support our customers and suppliers to meet their own environmental objectives.

The Product Sustainability team, and Seagate as a whole, recognize that we are responsible for the environmental impact of the products we place in the market. Seagate's products use process chemicals and materials drawn

from natural resources. This results in impacts that our internal policies and procedures, which range from material restrictions to responsible sourcing of material, are designed to mitigate. Our Product Sustainability team works with internal and external partners to assess and reduce the effect our products have on the environment and conducts LCAs and other analyses to help manage any tradeoffs.

We evaluate the management system through various channels including management reviews, LCAs, internal and external verifications, and audits and performance

against targets. We believe the management system is functioning effectively year over year, and minor adjustments are made as needed. Seagate publishes our progress on the [Global Citizenship page](#) of our website. Health and Safety considerations are addressed at the design stage to meet all regulatory and customer requirements. For more information on our supply chain ESG Program, please refer to the [supply chain section](#) of this report.

All of Seagate's products are assessed to meet regulatory requirements for health and safety in jurisdictions where we do business. In FY2021 we had zero incidents of non-compliance with such regulations. Additionally, none of Seagate's products or services are banned in any markets where we do business. A global cross-functional team, known as our Global Market Access Council, is chartered with ensuring all regulatory requirements are met when placing our products in the markets where we do business.

Product Impacts

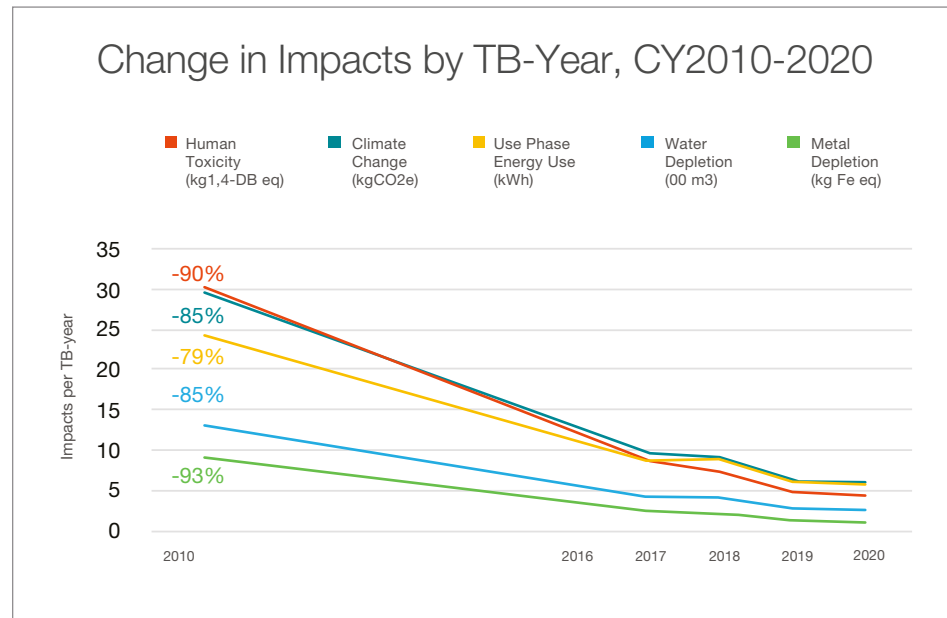
Our Corporate Sustainability organization maintains Full Material Disclosures (FMD) from our suppliers for each part included in our products; we require our suppliers to refresh this annually. FMDs list the materials and substances that are in components to determine how much energy, water and material is used to produce the components, as well as to determine human toxicity. This information is used in our product LCAs to target improvements to our products' environmental impact and can be accessed quickly to address any concerns about substances that arise.

Our LCAs are conducted in accordance with the International Organization for Standardization (ISO) 14040:2006 and 14044:2006.

The Seagate Green Design Tool, based on Footprinter™ models, is used to help create the LCAs, and has achieved a limited assurance verification by UL Environment based on criteria as detailed in the International Standards for LCA (ISO 14040 and ISO 14044), and the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol Product Life Cycle Accounting and Reporting Standard.



Impacts per TB-year have decreased by 85-93 percent across impact times since CY2010. This was largely driven by the increased sales in the Enterprise Nearline market segment and a decrease in the Personal Storage market segment, while all markets showed an increase in average capacity and lifespan (extended warranty.)



Average annual reduction between CY2010 and CY2020

 <p>Climate Change (kg CO2e) Assessed across the seven GHGs specified in the GHG Protocol Product Standard</p>	-8%	 <p>Human Toxicity (kg 1,4-DB eq) Accounts for environmental persistence, accumulation in the human food chain, and human toxicological effects</p>	-9%
 <p>Metal Depletion (kg Fe eq) Indicates the amount of mineral deposits consumed</p>	-9%	 <p>Water Depletion (kg cubic meters) Reflects the amount of water withdrawn in cubic meters from local freshwater systems</p>	-9%

Annual Product Sustainability Target

Sustainability target

Per year against baseline on four indicators

-5%

Reduction achieved across all indicators since CY2010

Average reduction between CY2010 and CY2020

-8% to -9%

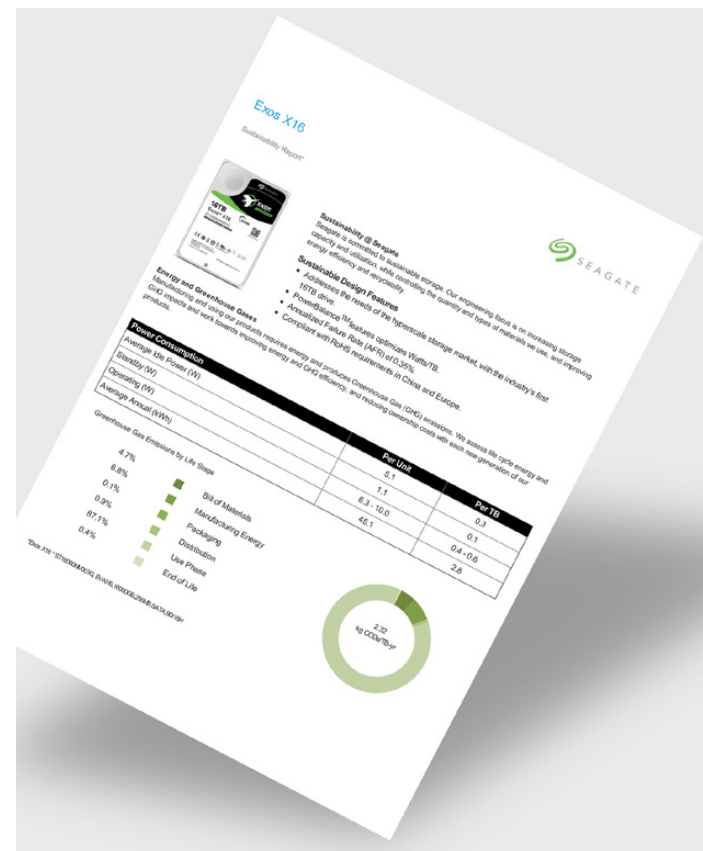
Reduction also achieved over the past year

Average reduction between CY2019 and CY2020

-24% to -48%

We prioritize product LCAs based on production volume and customer data requirements. We assess 100 percent of our products for health and safety, and improvements related to health and safety, based on a representative drive from each family of products. Product-related Health and Safety risks are addressed in the design of our products and are provided in product manuals to users.

With our commitment to credibility and transparency, we maintain third-party assurance for the complete reporting of LCA results. The actual use of our products represents the most significant environmental impact of the product life cycle. We believe the single largest



opportunity to reduce the environmental impacts from our products use is the proper application of Seagate's product power conservation modes. This enables customers to both reduce the costs associated with drive operation and lower the impacts to the environment without sacrificing performance. The advantages of these power conservation modes are described in the product manuals.

Seagate does not stipulate post-consumer content when procuring components or parts from suppliers; however, we acknowledge that there is post-consumer material inherent in today's raw material supply. Utilizing data from our LCAs, Seagate is able to determine the impact of metal depletion per TB of storage capacity shipped on average for our product portfolio. The metal depletion indicator specifies the amount of mineral deposits that are consumed to provide the end-use material in question. The process is normalized to the extraction of iron (kg Fe-Eq). More than 90 percent of our product is made from minerals; for CY2020, the average metal depletion per TB across Seagate's product portfolio was 2.50 kg Fe-Eq, and the total impact to metal depletion equates to approximately 1.3 million metric tons of Fe-Eq. The material is non-renewable and is limited to the production of the product only. The information disclosed does not include packaging.

Our LCA reports are published on Seagate's [external website](#), and cover our Enterprise HDD, Enterprise SSD and Consumer HDD products.

Product Life Cycle Management SASB Information

Accounting Metric	Response
Percentage of products by revenue that contain IEC 62474 declarable substances	100% – All Seagate products contain IEC 62474 declarable substances
Percentage of eligible products, by revenue, meeting the requirements for EPEAT registration or equivalent	Not applicable for Seagate, but as it is applicable for our customers, we help them meet requirements*
Percentage of eligible products, by revenue, meeting ENERGY STAR® criteria	100% – Eligible products by revenue that meet the ENERGY STAR® criteria only applies to Enterprise Data Solutions products (not SSD or HDD) which make up <10% of our overall revenue as of end of FY2021
Weight of end-of-life products and e-waste recovered, percentage recycled	Not applicable for Seagate, as we have a warranty program but no product take-back program**

* The EPEAT standard does not apply to our product portfolio, however we do provide data in support of our customers who submit their systems for EPEAT registration.

** Seagate customers are responsible for end-of-life e-waste management according to local requirements.

Packaging

We are continuously working to reduce our packaging volume and impact while meeting product requirements. Packaging is relevant to both our environmental impact and our stakeholder goals. As Seagate and our customers move towards reducing the use of single-use plastics, we continue to work holistically to reduce packaging and recycle as much of our packing material as possible.

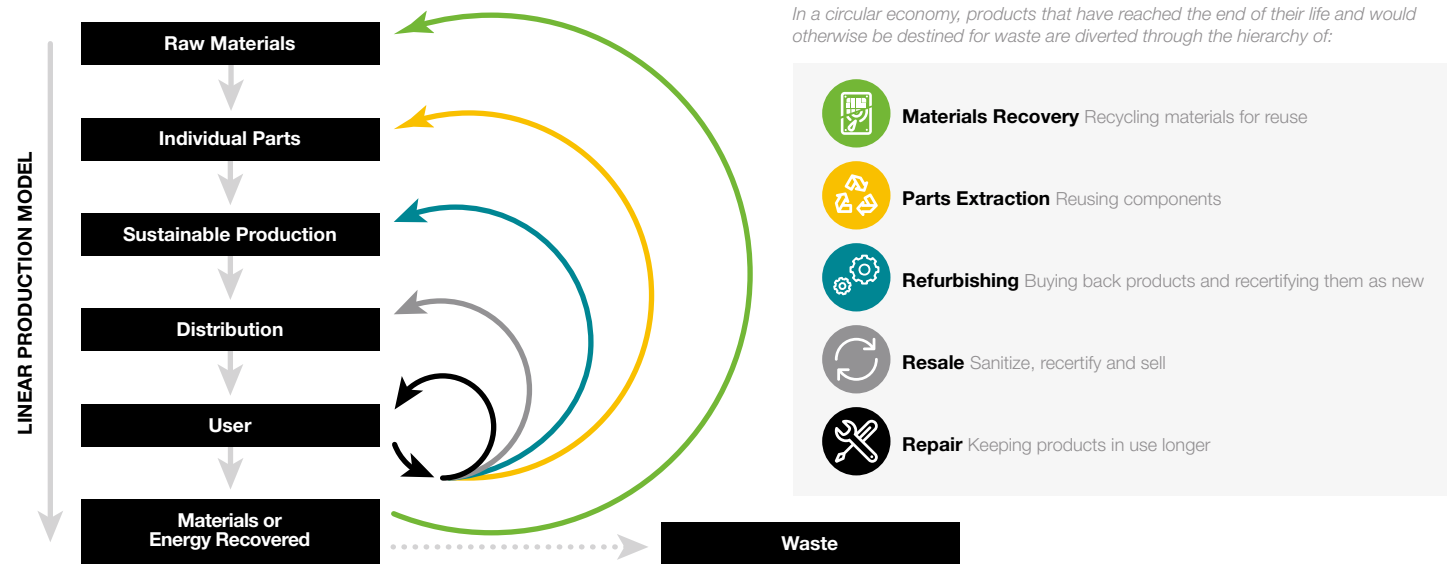
In FY2021, all core Seagate HDD products were shipped using certified Forest Stewardship Council (FSC) packaging, which constitutes approximately 3,567 metric tons of paper material. As of FY2021, all packaging for Seagate Consumer Solutions Group products is made from 100 percent recycled plastic, which is also 100 percent recyclable. All paper boxes (except retail boxes) are manufactured with 100 percent recycled materials. Currently, the retail box color scheme requirements prevent it from being sourced from recycled materials. Our LaCie products' casing is made from recycled metals.

Materials Use and Circularity

There is increased attention on the circular economy as most industrialized countries recognize that linear (or "take-make-waste") economies are unsustainable for both their businesses and our global wellbeing. This is driven in part by growing recognition of the reality of dwindling finite resources and increasing concerns regarding availability and access. Seagate is committed to pioneering innovation in circularity, both internally and with our external stakeholders and peers.

Seagate includes a circularity metric within each product LCA, the Material Circularity Indicator (MCI). We created and maintain the MCI to benchmark our products, identify opportunities for improvement, and to target increased material efficiencies that benefit Seagate, our customers, and our partners. Our LCAs are publicly available on the [Global Citizenship page](#) of our website, for each product on which Seagate has completed ISO 14040/14044 LCA studies.

Circular Production Model



CIRCULARITY PILOT

As documented in the FY2020 report, Seagate and Google collaborated on a circular component pilot in which the VCMA's were successfully recovered from several thousand end-of-use HDDs and reused in closed-loop manufacturing of new HDDs. In FY2021, an LCA analysis was conducted on an enhanced version of the process for recovery and closed-loop reuse of VCMA's. The LCA analysis confirmed an 86 percent reduction in GHG emissions per VCMA set in the new drives as compared to the manufacture of a VCMA set from the linear extraction-manufacture process.



The circular economy will affect the evolution of business models as well, shifting from the current make and ship paradigm to services that bookend the life cycle of products.

Because most of Seagate's products are sold as components to larger systems managed and produced by OEMs or resellers, we have limited leverage over how our products are managed at the end of their useful life. Just as we recycle our own internally generated scrap, we provide information to enable our customers' reclamation efforts and encourage participation in manufacturer take-back programs.

Seagate helps to manage product waste for our retail products and servers by taking back warranty-returned drives, extending the life of 1.29 million HDDs and SSDs in FY2021. The drives were recovered and placed back into the market, avoiding over 600 metric tons of e-waste. Drives are recycled at locations that have been audited by a third-party to ensure our environmental standards are met. We also provide customers with drive disassembly instructions to facilitate recycling.

CASE STUDY

The Strategic Partnership with Dell Technologies Continues in FY2021

We successfully completed the closed-loop aluminum recycling pilot program begun with Dell Technologies in FY2020. In the pilot, the HDD scrap motor base assemblies and aluminum discs from end-of-life drives were channeled to our base plate aluminum smelter for recycling. This pilot has since been adopted as an ongoing process and has produced 24.7k new BarraCuda 3.5 2TB V11X drives from the recycled material, resulting in 39.4 metric tons of aluminum scrap recycled.

We continue our partnership on rare earth magnet recovery as well, with 1.1 metric tons of rare earth materials recovered, a step forward in reducing environmental impact.

FY2021 Circularity Program Indicators



Extending Product Life

- 1.29 million HDDs and SSDs



Material Recycling

- Scrap Magnets: 1.1 metric tons
- Scrap Aluminum: 39.4 metric tons

LOOKING FORWARD: PRODUCT SUSTAINABILITY

In FY2022, Seagate will continue pioneering innovation projects coupled with strong industry collaboration to achieve product sustainability improvements. Leveraging LCA metrics from both future and existing products, we intend to extend opportunities to reuse, refurbish, recover, and reclaim our products, components, and materials. LCAs will track the impact of these efforts, enabling circular economy with our customers and supply chain partners.

In FY2022, Seagate will begin to transition from using Expanded Polypropylene (EPP) pink antistatic foam to EPP white non-antistatic foam to increase recyclability of our shipping and packaging containers. Seagate plans to provide a product take-back program for our customers to return drives to Seagate for refurbishment and reuse. By leveraging our effective product security features and processes and proven high yields in the recovery of HDDs, Seagate is poised to partner with our customers for extended use of our products.

These specific actions, along with scaled implementation of all recycling and circularity opportunities in our design, source, and manufacture processes, will enable Seagate to extend our materials efficiency and circularity for the benefit of our stakeholders and the planet.

Chemicals and Restricted Substances

Restricted substances have a negative impact on the environment and human health, especially at the product end of life. Seagate's target is to meet or exceed applicable global regulations and our customers' strictest specifications for restricted substances. We compile customer and regulatory requirements into an overall Seagate restricted substance specification in an internal compliance database. Seagate has developed and communicated policies and procedures within the company and to our supply chain to ensure product environmental requirements are met.

The restricted substances program is managed through Seagate's product environmental compliance function. This function currently verifies supplier part restricted substance compliance for more than 3,000 declarable and restricted substances in our Compliance Assurance System (CAS). The Chemical Abstract Service numbers for chemical substances present in Seagate components and products are cataloged in the system as well. The information from our CAS database is used to respond to customer product environmental compliance inquiries; in FY2021 we received and responded to approximately 4,500 inquiries.



FY2021 CAS Database Updates

(Environmental compliance information collected and verified on all Seagate and supplier parts)



Seagate strives to comply with all regulatory requirements where we and our customers do business; therefore, we adhere to global restricted substance legislation, including:

- Directive of the European Parliament and of the Council on the Restriction of the Use of Certain Hazardous Substances (RoHS) in Electrical and Electronic Equipment 2011/65/EU (RoHS) and amendments including 2015/863/EU
- The European Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
- Directive of the European Parliament and of the Council on Waste Electrical and Electronic Equipment (WEEE), 2002/96/EC and recast in 2012/19/EU
- United States Toxic Substances Control Act (TCSA), as amended in 2016 by the Frank R. Lautenberg Chemical Safety for the 21st Century Act
- China Ministry of Industry and Information Technology (MIIT) Order No. 32 the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products (China RoHS 2)

Our restricted list of chemical substances is continuously updated. Seagate monitors regulatory, industry, and customer requirements for changes in order to comply with new reporting requirements and restrictions, including elimination from Seagate products if necessary.

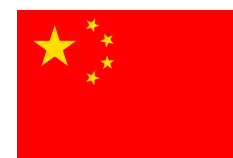
In FY2021, ECHA added 10 new substances to the REACH Candidate List of Substances of Very High Concern (SVHC), bringing the total number to 219 as of July 2021. Using FMD information from our CAS database, Seagate determines if and where SVHCs are present in our products, and at what concentrations, both at the homogeneous material and article levels. The 10 added substances were confirmed to not be present in any Seagate products or components. Updated REACH Article 33(1) declarations were generated and made available as an assurance to customers that the declarations account for all 219 SVHCs if present at >0.1 percent w/w (weight by weight) in articles (parts or subparts in an assembly the make up a finished product).

Commencing January 5, 2021, Seagate began submitting information on articles in our products containing SVHCs at a concentration >0.1 percent w/w to ECHA's new public SCIP database established under the Waste Framework Directive (2008/98/EC). Unique SCIP notifications are created for all Seagate products that contain SVHCs >0.1 percent w/w at the article level, with the information on Candidate List substances available throughout the entire life cycle of products, including to businesses, customers and recyclers at product end-of-life.

Seagate products rely on certain RoHS 2011/EU Annex III exemptions for lead that were scheduled to expire in July 2021. Seagate supported renewal requests that were submitted by industry umbrella groups for essential uses of materials with lead >0.1% w/w where no suitable alternatives exist. These are under review at the time of this publication. Seagate continuously works with our suppliers to determine if there are suitable lead-free alternative materials, and where possible substitutions are made.

Regulatory Compliance

FY2021 Completed



China

Volatile Organic Compounds limits
GB 30981-2020
GB 33372-2020
GB 38507-2020
GB 38508-2020



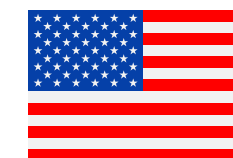
European Union

ECHA SCIP database notifications under WFD (2008/98/EC)



South Korea

Packaging material requirements (Notice No. 667, 2020)



United States

Environmental Protection Agency TSCA Section 6(h) restriction on 5 PBT chemicals

FY2022 Planned



Saudi Arabia

SASO RoHS certification



United Kingdom

RoHS, REACH



European Union

IEC 63000:2018 replaces EN 50581:2012



Italy

Packaging recycling labeling (Decree-Law No. 228/2021)

With the goal of exceeding product environmental compliance requirements, we try to enable customers to manage their own product compliance at the finished product level. This provides them with the opportunity to participate in programs such as the Electronic Product Environmental Assessment Tool (EPEAT). Seagate products are generally components, for which no EPEAT standards apply. Our ability to verify RoHS compliance and identify product composition at both the homogeneous material and article levels assures

customers that the incorporation of Seagate components into their final products support their ability to meet both relevant EPEAT requirements and optional criteria.

In FY2021, Seagate received no significant fines or nonmonetary sanctions for product environmental non-compliance, including those related to restricted substances. Working with our product environmental compliance business process outsourcing partner, we continue to identify and leverage process efficiencies.

LOOKING FORWARD: RESTRICTED SUBSTANCES

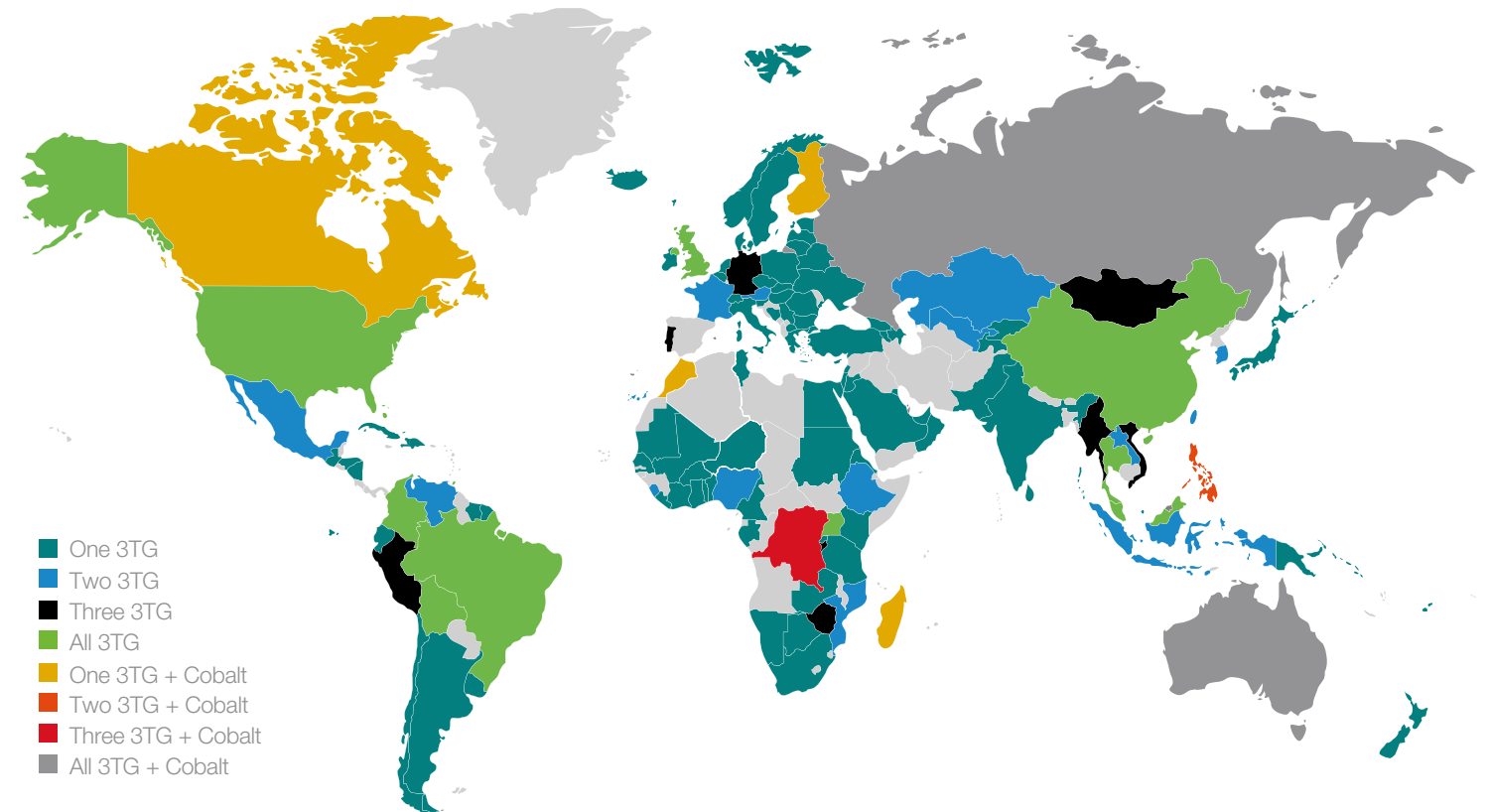
In FY2022, Seagate will continue to research, identify, and qualify suitable alternatives to hazardous substances in our products, including those components containing materials with RoHS exemptions, REACH SVHCs, and substances identified for potential future restriction. Seagate will also improve our awareness of substances used in current and future products to progress ahead of increased global regulatory restrictions, including increased restriction and reporting requirements in the United States, European Union, and other regions.

Responsible Sourcing of Minerals

The challenge remains in electronics industries of ensuring that conflict-free minerals are sourced in ways verified to be free from human rights abuses. Seagate remains committed and vigilant against human rights violations through our supply chain, and we continue our goal of maintaining a conflict-free status across our product portfolio. This effort begins with Seagate's [Responsible Sourcing of Minerals Policy](#), which covers all direct components that source into our product portfolio. Tin, tantalum, tungsten, gold (collectively, 3TG) and cobalt are minerals commonly mined in the Democratic Republic of the Congo (DRC) and adjoining

countries, as well as other Conflict-Affected and High-Risk Areas (CAHRAs). Some of these minerals are prone to be illegally sourced and traded by armed groups who are responsible for human rights violations. The Dodd-Frank Act, Section 1502, adopted in the United States in CY2010, requires companies to investigate their mineral supply chains and disclose if any 3TG used in their products originated in the DRC or an CAHRAs. If so, efforts are required to be undertaken by the company to ensure the origins of these minerals are documented, identified, and reported to the United States SEC.

The Sources of 3TG and Cobalt in Our Products





Seagate participates in the Responsible Minerals Initiative (RMI), enabling us to contribute to industry solutions while maintaining standard processes for data collection and complying with regulations. Apart from a few instances, Seagate does not source any of the 3TG in our products directly from smelters/refiners.

Seagate conducts mineral due diligence in alignment with the most recent version of the Organization of Economic Cooperation and Development (OECD) Due Diligence Guidance for responsible Supply Chains of Minerals from CAHRAs. Our [Responsible Sourcing of Minerals Policy](#) was reviewed and updated in CY2020 and is available on our website.

We conduct training for our suppliers to raise awareness of our policy to maintain a responsible supply chain. During the training, Seagate advocates that the minerals used to produce our products are to be sourced from smelters and refiners validated as Conformant to the Responsible Minerals Assurance Process standards. Seagate requires our suppliers to conduct annual due diligence and report sourcing information using the Conflict Minerals Reporting Templates (CMRT). Throughout FY2021, we continued to manage supplier communications and data via our CAS.



In FY2021, Seagate’s entire product portfolio containing 3TG was validated as “DRC conflict free.” For the conflict minerals reporting period which closed midway through FY2021, (January 1, 2020 through December 31, 2020), CMRTs were collected from 100 percent of our in-scope suppliers. Every 3TG smelter or refiner in our supply chain conformed to the Responsible Minerals Assurance Process standards as of the close of CY2020.



Critical Materials

Seagate recognizes that in addition to 3TG, there are inherent procurement risks associated with other mineral-based products that we refer to as Critical Materials, which includes but is not limited to cobalt. Of the 35 mineral commodities designated as Critical Minerals by the United States Department of the Interior, 17 are present in our products. In FY2021,



one additional mineral was identified as critical to our operations. An internal, interdisciplinary team at Seagate rated these 18 critical materials using a four-tiered risk rating across three risk domains. The risk ratings are specific to Seagate and are by nature temporally-variable; risks are re-rated annually at a minimum.

In CY2020, two of the 18 minerals achieved a risk-score meeting or exceeding our internal threshold for reporting: cobalt and the rare earth elements (which we view collectively).

Cobalt was rated highest for risk, as approximately two-thirds of the world’s cobalt is mined in the DRC (exposing it to similar risks as 3TG). As COVID-19 impacted these mining activities, the global supply of cobalt was put at risk of severe restriction. Seagate has extended our due diligence beyond what is required by law and maps the origins of cobalt in our supply chain via the RMI’s Cobalt Reporting Template (CRT). The CRT provides a standardized mechanism to share

cobalt-sourcing data throughout the supply chain. Seagate has used the CRT to gather cobalt-sourcing information from all our direct material suppliers and makes this information available by request to customers.

The high-risk rating of the rare earth elements is primarily due to uncertainty surrounding availability, as well as volatility in price. While the global demand for rare earth elements has doubled over the past 25 years, a single country controls the bulk of the world’s supply. This limited diversity in the origin of the rare earth elements, and the significant price swings seen over the last decade due to supply constraints, are concerning for Seagate, due to the need for rare earth elements in our products – especially our HDDs. Our [circularity initiatives](#), particularly around the re-use of magnets, help address these concerns.

Seagate’s risk management and compliance functions monitor news aggregators, industry association newsletters, and other information channels to maintain awareness of events that could affect our material supply chains. As needed, we coordinate with our



supply chain to mitigate potential supply disruptions. Where possible, Seagate maintains multiple suppliers for each component we purchase to enable swift sourcing changes in response to risk, pricing, and availability challenges. Our commodities management organization reviews raw materials pricing trends on a quarterly basis to forecast spending changes.

The Management of Risks Associated With the Use of Critical Materials



LOOKING FORWARD: RESPONSIBLE SOURCING OF MINERALS

In FY2022, Seagate, in accordance with our [Responsible Sourcing of Minerals policy](#), and in collaboration with RMI, will work to maintain our “DRC conflict-free” status. Seagate will also encourage more of our supply chain to use responsibly sourced cobalt. We intend to identify the next phase of minerals that will lead to responsible sourcing efforts.

Environmental Sustainability

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We first published our Environmental Footprint Reduction targets in 1999. Since then, we have maintained and expanded our public disclosures on environmental impacts each year. But beyond transparency of our track record, Seagate's value of Integrity requires us to take meaningful and measurable action today on climate change. Seagate, along with industry peers and global stakeholders, must address the harm caused by materials depletion, power and water overuse, and waste.

That is why Seagate has taken the first step by boldly and publicly pledging to reduce greenhouse gas emissions and marshalled expert resources toward this effort. We invite our customers and stakeholders to partner with Seagate to advance our common causes and collective efforts – and make an exponentially larger difference to the planet. Only this way will the industry achieve global goals of truly sustainable digital storage.



Joan Motsinger
Senior Vice President,
Business Sustainability
and Transformation

06



Seagate recognizes that climate change and environmental damage are real and contributed to by human activity. We must be responsible to our people, the planet, and our own long-term sustainability as a company in working to reduce our impact.

Our global environmental sustainability efforts are part of how we do business. We regularly set goals to track our progress, and all efforts in reducing our energy consumption, carbon emissions, waste, and water usage are supported by senior management.

Seagate works with several outside organizations, such as the RBA, UNGC, and SBTi to validate and further our efforts. We also educate our suppliers and key stakeholders on sustainability and performance measurement best practices. These actions comprise the majority of our environmental sustainability efforts.

To the best of our knowledge, no Seagate operations are owned, leased, managed in, or adjacent to protected areas and areas of high biodiversity value outside protected areas.

Management Systems

Our environmental management system is shaped by ISO standards, the RBA Code of Conduct, UNGC principles, and stakeholder input, creating a platform for industry leadership in environmental sustainability. The management system's effectiveness is evaluated through various channels, including management reviews, internal and external audits, and performance against targets. Overall, we believe the system functions effectively, and minor adjustments are made as needed.

At the end of FY2021, all Seagate's manufacturing sites maintained certification to the ISO 14001 Environmental Management System (EMS). The EMS covers the seven manufacturing sites and central function, similar to ISO

45001. Seagate had 18 environmental regulatory visits in FY202 (these include site visits, air monitoring, and wastewater sampling) and received no violations.

We align with ISO standards in implementing energy management systems, with the goal of driving a common and sustainable energy management program at all manufacturing sites. All seven of our manufacturing sites are certified to the ISO 50001 Energy Management System. The ISO 50001 management system allows us to align to an established international standard. Our approach is to identify opportunities for energy conservation and improved operational excellence while being accountable to senior management.

Climate and Energy

Seagate's use of energy and process chemicals is required in manufacturing our products and providing our services. We will reduce related GHG emissions due to energy and process chemical use by identifying conservation opportunities, auditing our management systems, setting targets, and reporting our progress to employees, suppliers, and customers. The most significant environmental reduction opportunity is reducing GHG emissions in our operations. Our goal is to reduce both energy use and GHG emissions per storage capacity produced to measure the impact relative to the amount of economic activity taking place. Measurements vary across the industry and among product types; we measure energy and carbon emissions intensity per exabyte (EB) of storage capacity shipped.

Seagate's largest sources of scope 1 and 2 GHG emissions continue to be purchased electricity and fugitive emissions (an unintended release of GHG compounds into the atmosphere from various types of equipment and processes). We require all our manufacturing sites to set and achieve annual energy savings goals to reduce their GHG emissions intensity.

Our product mix has migrated towards higher capacity drives in response to the rapid growth of the cloud-based storage market. While these products provide the highest capacity per unit, they typically require longer test times and run for a longer time, increasing GHG emissions per EB. We actively seek ways to mitigate the negative environmental impacts of these products. For example, we continue to search for a replacement

for the hydrofluorocarbon (HFC) solvent used in our manufacturing processes (a fugitive emission), and other chemicals that have high global warming potential. These are the main contributors to our Scope 1 emissions and are key to reducing our overall GHG emissions.

Seagate has been named to the [CDP's Climate A List 2020](#), highlighting our leadership in managing for climate change. We are actively working towards reduced GHG emissions and improving our TCFD disclosure. In addition, Seagate received an A- in Water Security and was ranked as a Supplier Engagement Leader.



WE REMAIN COMMITTED TO OUR SCIENCE BASED TARGETS:

“Global data storage solutions provider Seagate Technology Holdings PLC commits to reduce absolute Scope 1 and Scope 2 GHG emissions 20% by 2025 and 60% by 2040 from a 2017 base year. Seagate Technology Holdings PLC also commits to reduce absolute Scope 3 GHG emissions 20% by 2025 and 60% by 2040 from a 2017 base year. [More on Science Based Targets here.](#)”

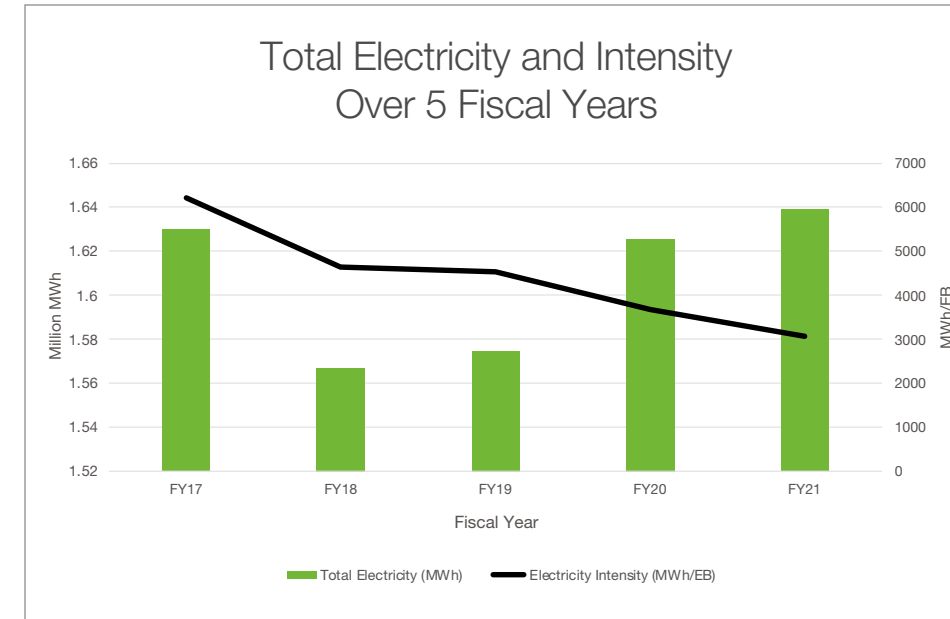
Scope 1 and 2 (market-based) GHG emissions increased by 5.3 percent from CY2017 to CY2020. While we remain committed to meeting Science-Based Targets, our CY2017 baseline has been adjusted with the latest emission factors and assumptions to reflect actual conditions.

We continue to take meaningful steps to meet our goals. The following are the actions we are taking to reduce

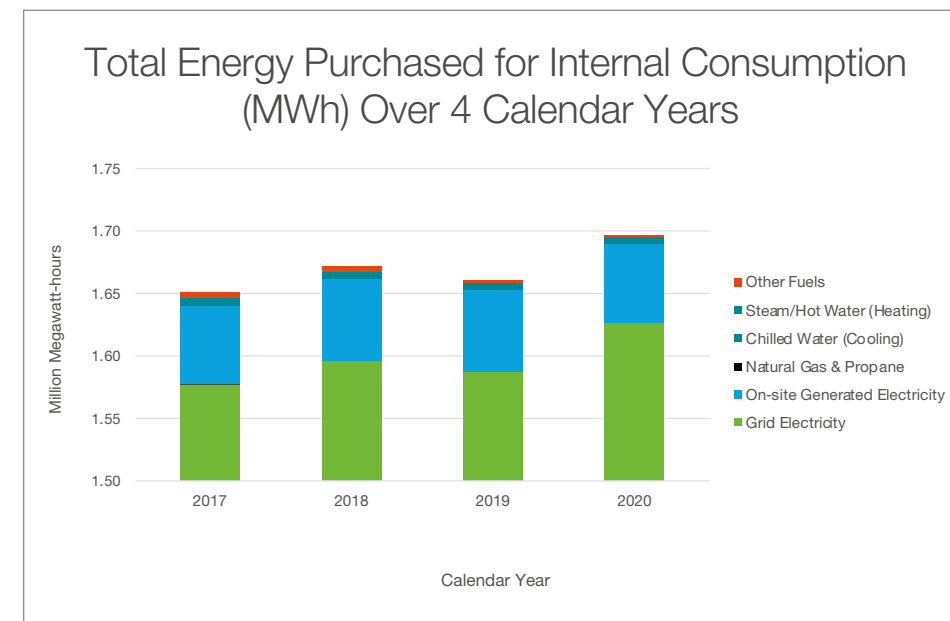
our Scope 1 and Scope 2 GHG (market-based) emissions. For Scope 1, we are progressing on a project to replace a process chemical which is a large contributor to our Scope 1 emissions and hope to complete the project in FY2024. For Scope 2, we have initiated the purchase of renewable energy starting with our Northern Ireland facility and are evaluating renewable purchases at our other locations to mitigate Scope 2 emissions.

Energy

To meet the increasing demand for cloud-based storage solutions, Seagate continues to innovate and produce higher-capacity drives. This requires more energy to manufacture our products. Normalizing our energy consumption per EB of shipped storage capacity helps guide our energy efficiency process and provide a standard to measure our progress. In FY2021, Seagate reduced the amount of energy consumed per EB shipped by 16.69 percent and the downward trend is expected to continue.

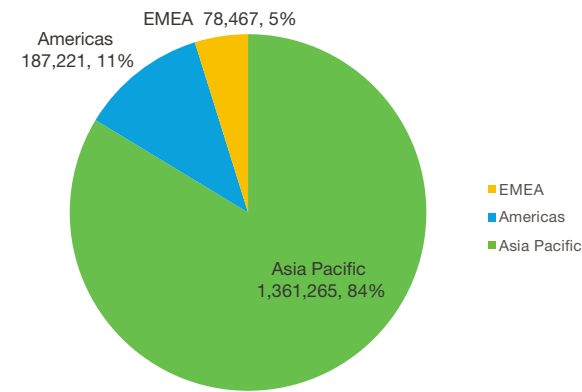


Seagate shipped 535.5 EB of storage capacity in FY2021, resulting in a total of 3,061 MWh per EB of storage capacity shipped, compared to 3,674 MWh in FY2020. The percent reduction in electricity consumption is 16.69 percent).



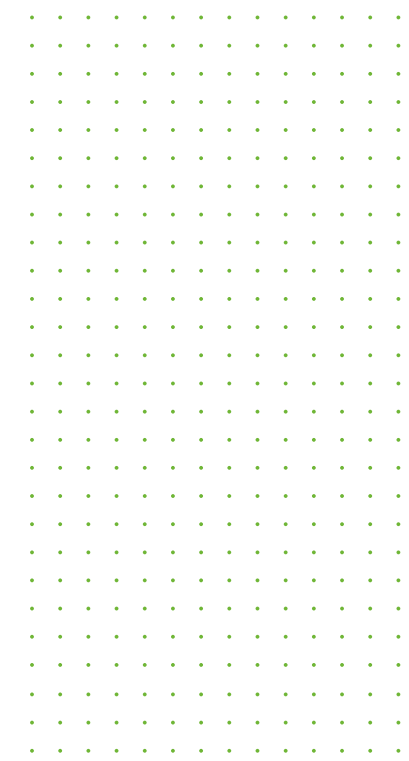
In CY2020, Grid Electricity was the major energy purchased for internal consumption. Seagate purchased 3.8 percent of Mixed Fuels, including Natural Gas & Propane, and 0.3 percent of Cooling. Seagate also purchased 0.02 percent of on-site Generated Electricity (Solar PV system managed by third party). Seagate did not purchase Heat after 2017.

Electricity Consumed Internally by Region in CY2020 (MWh)



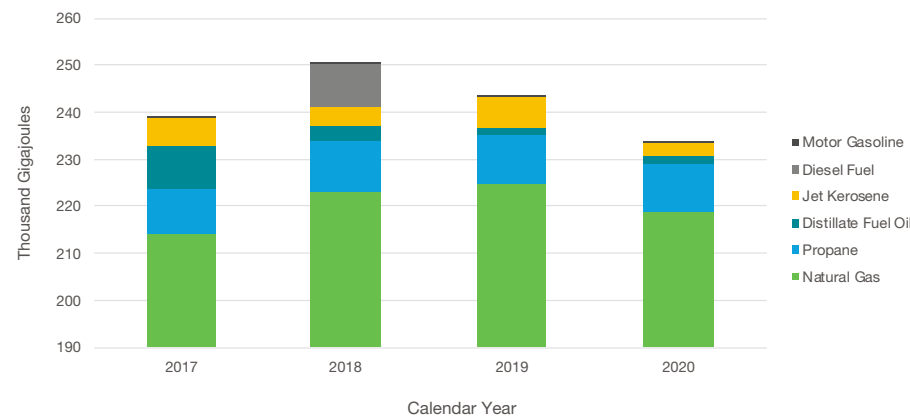
Reduction of Energy Consumption

Energy conservation continues to be a priority area of focus for Seagate. In FY2021, we saved approximately 23,000 MWh amounting to 14,000 tCO₂e of electricity through energy conservation and efficiency initiatives, exceeding our conservation goal of 10,000 MWh for the year. Energy savings are calculated using the Metered Baseline Method (MBM). In FY2014, Seagate initiated energy conservation projects focused primarily on electricity, saving a cumulative 210,000 MWh. We maintain conservation goals and have set a target of 10,000 MWh for FY2022. More information on our energy consumption refer to Seagate's [CDP Climate Change Disclosure](#).

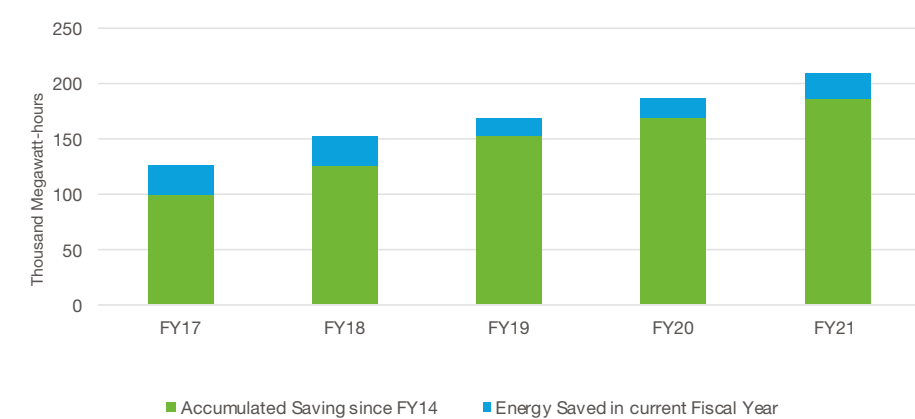


Total fuel consumed from non-renewable sources 233K Gigajoule (GJ)

Fuel Type Consumption from Non-Renewable Sources (GJ) Over 4 Calendar Years



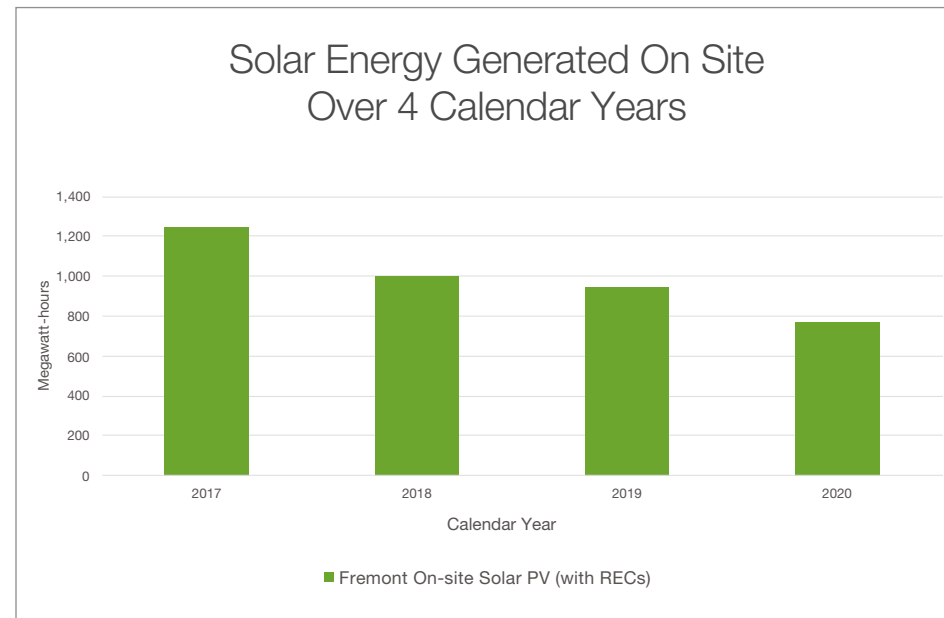
Accumulated Electricity Conserved Over 5 Fiscal Years (MWh)



Renewable Energy

We are implementing a company-wide renewable energy strategy that will reduce GHG emissions from our electricity use, utilizing both onsite generation and renewable energy purchases. Our Fremont, California design center generated 765 MWh of solar energy in CY2020 from a one-megawatt solar system. The total amount generated and associated environmental

attributes are retained by Seagate. At our Northern Ireland site, we entered a renewable energy-purchasing contract that enables the site to source 100 percent of its electricity from renewable sources. This accounts for 5 percent of electricity Seagate purchases globally. Renewable energy is evaluated on a continuous basis as part of our work in reducing GHG emissions.



The solar energy system we have at our Fremont site is a unique, legacy system that was acquired when we purchased the building. Maintaining the system has posed challenges as it is difficult to obtain parts and components to keep the system functioning efficiently, resulting in less solar energy generated over time.

Carbon Emissions

Carbon emissions data is collected by calendar year. Seagate's baseline year is CY2017, which is the first year we had complete Scope 3 data and when we set our Science Based Targets. Seagate measures Scope 1, 2, and 3 emissions. We share our factory performance results with our stakeholders annually in both our own report (the GCAR) and through CDP investor and supply chain questionnaires. Our responses are available on CDP's website and our own external webpage, and we share information with our customers through the RBA environmental module.

- [CDP Climate Change Response](#)
- [Third Party Verification](#)

Information on risks and opportunities posed by climate change can also be found in our CDP Climate Change response. We continue to assess climate change related risks to the business as part of our annual ISO 14001 management system process, and we have not identified any substantive risk unique to our company beyond what would apply to our industry. See [CDP Climate Change disclosure](#) for details on risks and opportunities.



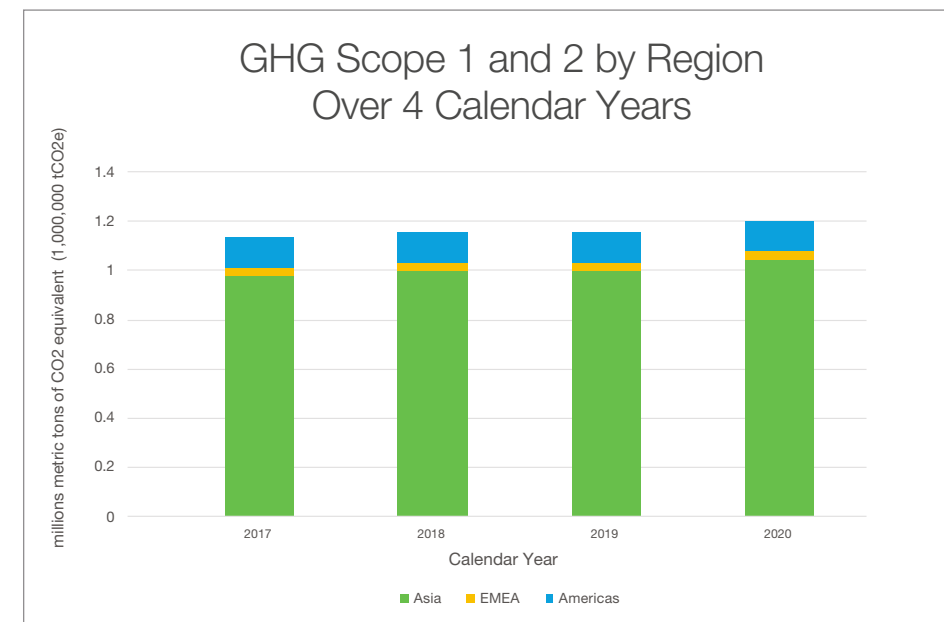
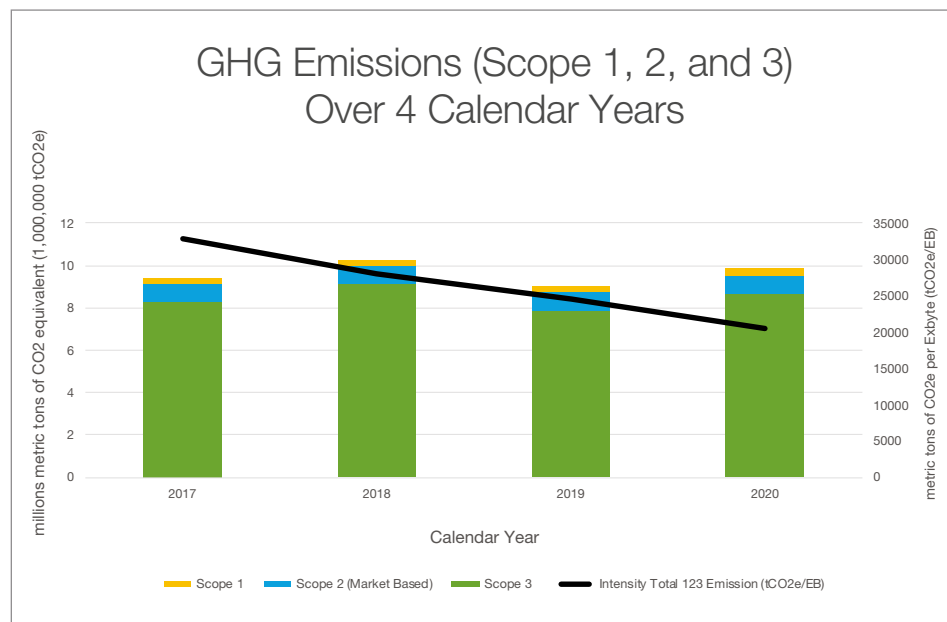
Scope 1, 2 and 3 Emissions Results

SCOPE	CY2020	CY2019	CHANGE	REASONS FOR CHANGE
Scope 1 Emissions: GHG emissions generated directly at our sites	311,120 metric tons of CO2e	280,604 metric tons of CO2e	11 percent increase	Additional Hydrofluorocarbons consumption in the process driven by volume increase
Scope 2 Location-Based Emissions: GHG emissions generated from the electricity that we purchase	879,032 metric tons of CO2e	869,654 metric tons of CO2e	1 percent increase	No significant impact from COVID-19 to energy consumption, major manufacturing sites operated as normal
Scope 2 Market-Based Emissions: GHG emissions generated from the electricity that we purchase	887,960 metric tons of CO2e	875,773 metric tons of CO2e	1.4 percent increase	No significant impact from COVID-19 on energy consumption, major manufacturing sites operated as normal
Scope 3 Emissions: Indirect GHG emissions that occur in our value chain, including both upstream and downstream emissions	8,670,300 metric tons of CO2e	7,859,200 metric tons of CO2e	10 percent increase	More storage capacities utilized at product use phase
Emissions Intensity: Total Scope 1 and 2 market-based emissions per Storage Capacity Shipped	2,494 metric tons of CO2e per EB	3,156 metric tons of CO2e per EB	21 percent reduction	Storage capacities shipped to market were growing over the years. Intensity Total vs 2017: intensity reduced 38% compared to base year

**Seagate adopts The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) to collect activity data and calculate emissions using an operational control approach. The emission data are reported for Scope 1 and Scope 2 as per the World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, and Scope 3 as per the WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

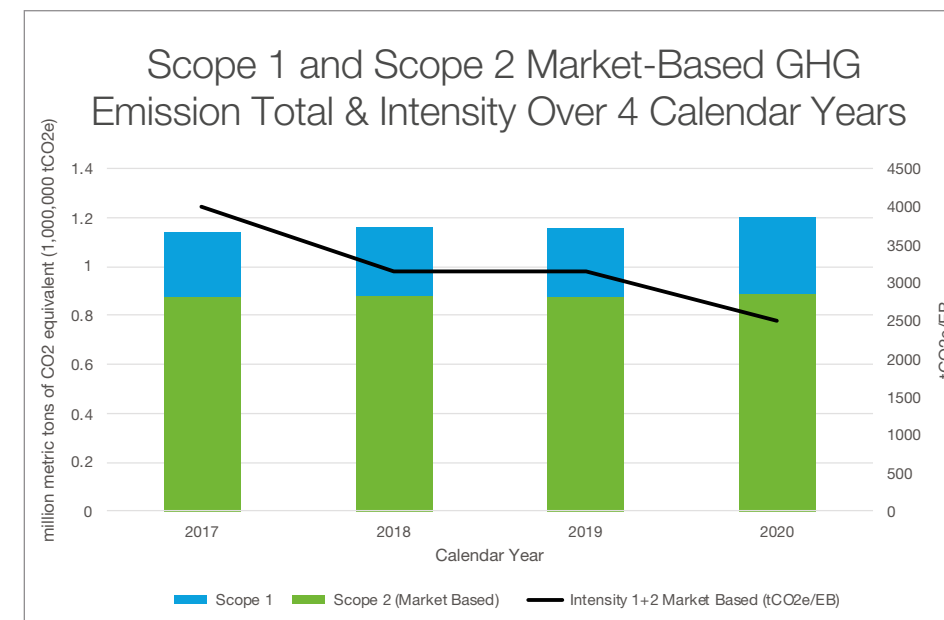
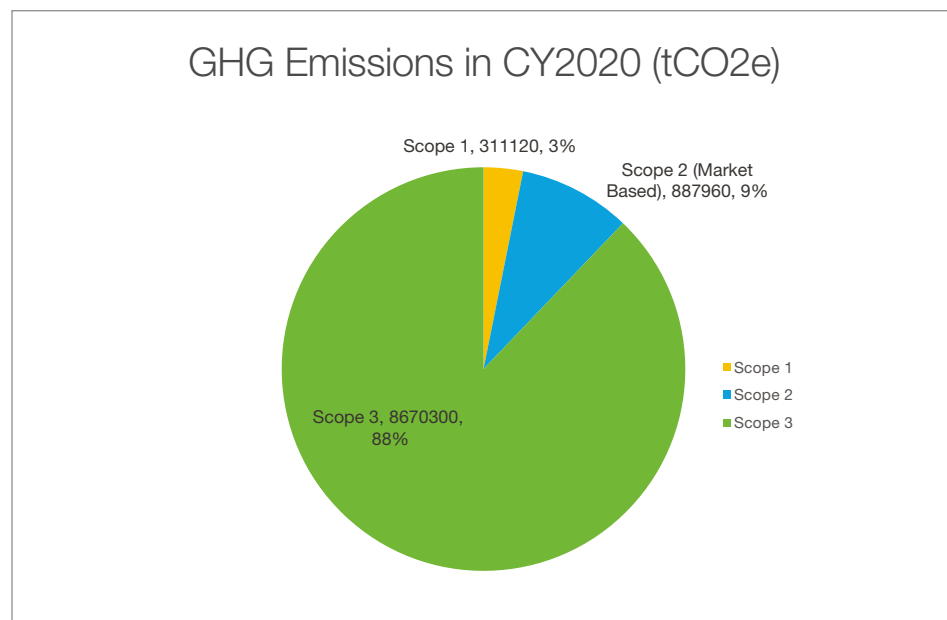
Our Global Warming Potential (GWP) factors are based on IPCC Fifth Assessment Report (AR5 – 100 year). Other gases used in our Scope 1 calculations include CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, 404A & 407C. Emission factors for electricity use are using EPA's eGRID2019 for the United States and IEA's CO2 Emissions from Fuel Combustion 2011 for outside the United States, used for Scope 2 calculations. For other energy, US EPA Emission Factor Hub, April 2021 (Fuels).

We also conduct third-party verification of our GHG emissions reporting, which is done every year per ISO 14064-3: Greenhouse gases—Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions.**



Seagate reports on all Scope 1, 2, and 3 categories that are relevant to our operations.

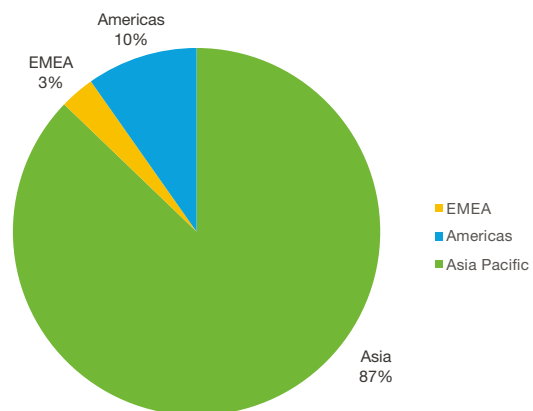
The other three categories: Downstream Leased Assets, Franchises, and Investments are not relevant to Seagate operations.



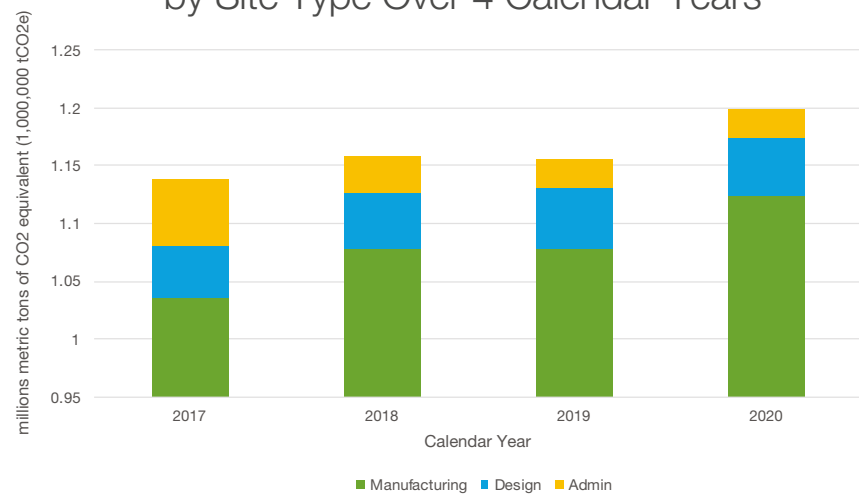
Total Scope 1 and Scope 2 market-based GHG emission intensity reduced 17 percent compared to CY2019, where more storage capacities were shipped to market.

Measuring emissions normalized over EBs shipped is a more accurate representation of the emissions portfolio of our business as compared to data being normalized to number of drives shipped.

GHG Scope 1 and 2 Market-Based by Region in CY2020 (tCO2e)

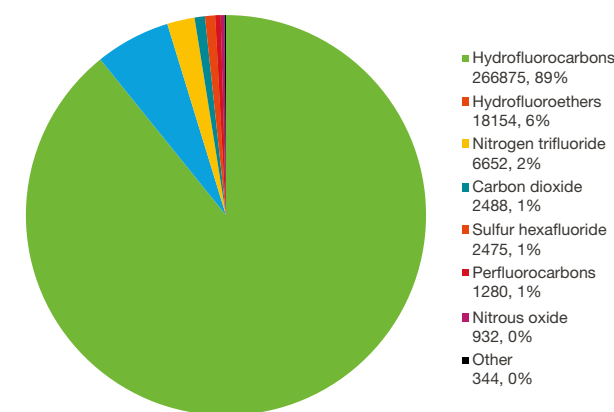


GHG Scope 1 and 2 Market Based Emissions by Site Type Over 4 Calendar Years



Seagate continues to face fugitive emissions challenges with the use of a hydrofluorocarbon solvent that has high global warming potential. This solvent is a necessary part of our media manufacturing process which we deploy in a closed-loop system with onsite recovery to minimize fugitive emissions. It is a priority for our media design and manufacturing teams to qualify a suitable replacement and reduce process emissions.

Breakdown of Direct Emissions (Scope 1) in CY2020 (tCO2e)



The hydrofluorocarbon solvent used in our head and media manufacturing process contributed 89 percent of the Scope 1 emissions totals in CY2020.

Scope 3 Emissions

Scope 3 emissions are typically much higher than Scope 1 and 2 emissions in the technology industry and driven primarily by product use and disposal. As products require more power and/or operate for longer durations, the emissions also change. By learning from current product analysis, we can better design future products to decrease our emissions. We use LCA results to inform us of sustainability impacts, including energy usage, along with other improvement areas such as packaging. Seagate's goal is for each generation of products to be more efficient (TB/watt) than the previous generation.

CY2020 GHG Total Emissions



2020 Total Scope 1, 2, and 3 Emissions: 9.87 million metric tons CO₂e

<p>Scope 3 Upstream = 1,611</p> <ul style="list-style-type: none"> Purchased Goods and Services = 1,200 Capital Goods = 160 Fuel and Energy Related Activities = 130 Upstream Transportation and Distribution = 100 Employee Commuting = 12 Business Travel = 1 Waste Generated = 5.8 Upstream Leased Assets = 2.2 	<p>Scope 2 market-based = 888</p> <ul style="list-style-type: none"> Purchased Electricity = 885 Purchased Cooling = 2.6 On-Site Generation = 0.1 <hr/> <p>Scope 1 = 311</p> <ul style="list-style-type: none"> Process/Fugitive = 299 Stationary Combustion = 11.7 Mobile Combustion = 0.2 	<p>Scope 3 Downstream = 7,059</p> <ul style="list-style-type: none"> Use of Sold Products = 7,000 End of Life Treatment for Sold Products = 50 Downstream Transportation and Distribution = 8 Processing of Sold Products = 1.3 <p>Scope 1, 2, and 3 Emissions listed in thousand metric tons CO₂e</p>
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CY2020 Emissions of Ozone Depleting Substances and Nitrogen Oxides, Sulfur Oxides, and Other Significant Air Emissions

In CY2020, there were no ozone depleting substances (ODS) recognized under the Montreal Protocol used in Seagate’s production. However, there was a total of 0.04 metric tons of CFC-11 equivalents used in test and development, and lab work. This data was based on an in-house annual chemical inventory, which originated from their relative ozone depletion potential (ODP). Determined from data generated and collected during an air emission monitoring program, our total

applicable significant air emissions concentration from our manufacturing sites were 112 mg/Nm³ NO_x, 151 mg/Nm³ SO_x, 8,516 mg/Nm³ volatile organic compounds (VOC), and 270 mg/Nm³ particulate matter (PM). We estimate 1.4 U.S. tons of combined hazardous air pollutants (HAP) emitted annually. Emissions factors are sourced from the EPA’s ODS page. Air monitoring complied with local regulatory standards and guidelines.

LOOKING FORWARD: ENERGY AND CARBON EMISSIONS

In FY2022, Seagate intends to reduce Scope 2 direct and indirect emissions and our resulting carbon footprint by more than 50% as 4 of 7 of our manufacturing sites transition to 100 percent renewable energy. Other energy efficiency projects are also targeted to save 10,000 MWh year over year.

We expect to reduce Seagate’s Scope 3 indirect emissions and resulting carbon footprint by engaging our suppliers and customers through shared models, training, best practices deployment, and by increasing our influence across the industry.

These actions build on our ISO 50001 certification for all manufacturing sites. Taken collectively, they will enable Seagate to meet and exceed our commitments to SBTs.

Waste Management

Waste from the manufacturing process is an inherent aspect of Seagate’s operations, which makes its management a priority. We have established programs to properly track, manage, and report all waste types across our global footprint; these programs assist us with categorizing different waste streams, ensuring the proper disposition in accordance with regulatory requirements. Our waste reduction initiatives strive to reduce environmental impact while generating the most benefit, where we first prevent waste from being produced, and then move to recycling or reusing waste where possible.

Each Seagate site reports data on waste to a central database, which is accessible by employees and reviewed by Seagate Corporate Sustainability team to ensure we are adhering to best practices. Hazardous waste treatment vendors are qualified through a third-party audit of set criteria and have established minimum requirements for their selection and performance.

Seagate had no significant spills (defined as one which is reported in the financial statements as a liability requiring outside response by a party external to Seagate) in FY2021.

Two Main Types of Waste

Non-Hazardous Waste:

Examples include wood, paper, cardboard, and non-hazardous plastics.



Hazardous Waste:

Examples include organic solvents, sludges, corrosive waste, and e-waste.



Non-Hazardous Waste

We measure the performance of our program by tracking the metrics listed in the graph that follows, taking into account recycling and energy recovery. Our annual totals include all waste generated at sites under Seagate’s ownership and control, not including waste generated as part of new construction projects.



FY2021 Target

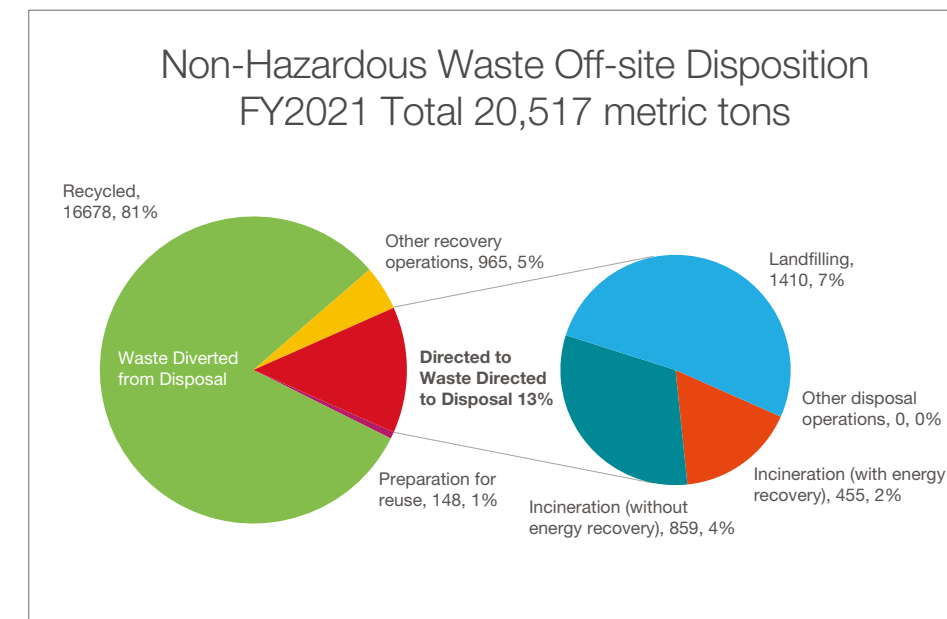
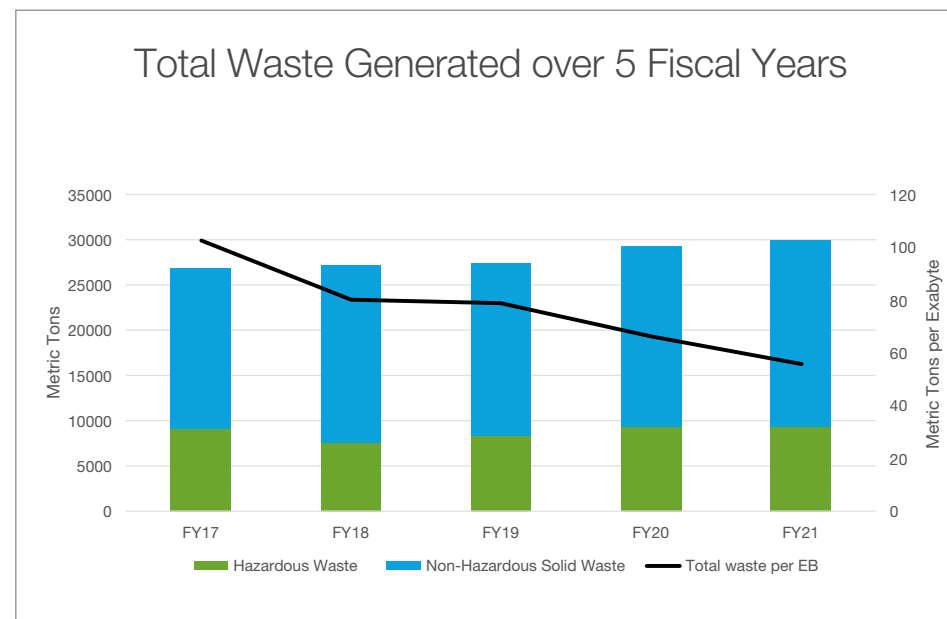
A diversion rate for our non-hazardous waste of 87 percent or above



FY2021 Results

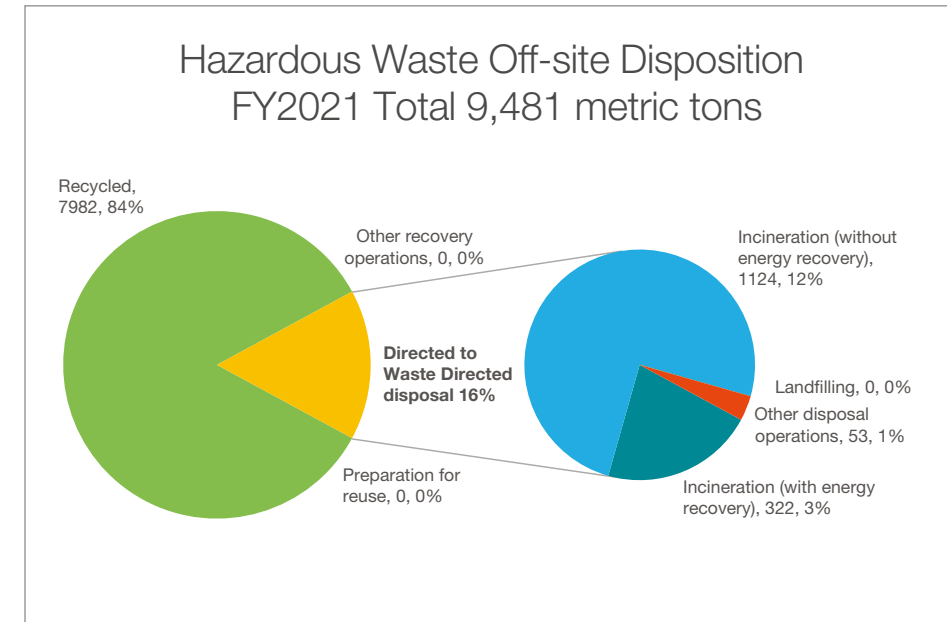
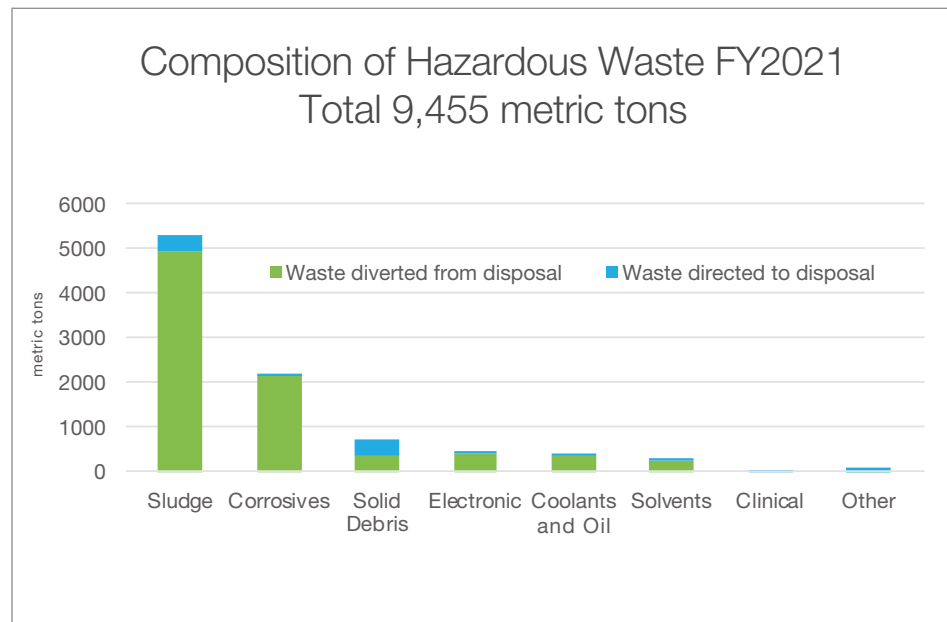
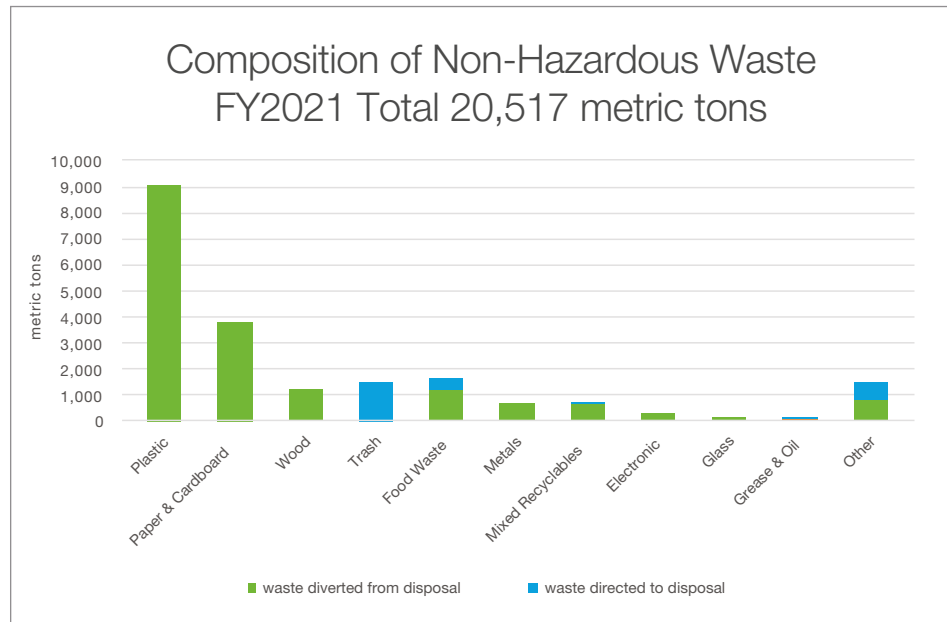
87 percent diverted

*generated 3 percent more non-hazardous waste in FY2021 at 20,517 metric tons, compared to 19,897 metric tons in FY2020



Non-Hazardous Waste
Off-Site Disposition
FY2021 Total 20,517
metric tons

We utilize CHWMEG third-party audit reports to assess Treatment, Storage, and Disposal Facilities (TSDF) across global sites. When CHWMEG audit reports are not available, we directly contract with third-party firms to conduct audits of TSDFs. In FY2021, we conducted or reviewed four Hazardous Waste TSDF audit reports to ensure these facilities meet the standards set by Seagate Corporate Sustainability. A total of 9,481 metric tons of hazardous waste was transported to in-country TSDFs for treatment in FY2021. No waste was imported or exported during the year. The volume of waste transported is calculated from hazardous waste consignment notes that accompany the shipment for treatment and is validated by the TSDF.



Hazardous Waste
Seagate continues to use recycling as the main method of disposal for hazardous waste. 84 percent of our hazardous waste was diverted from disposal and three percent of what was directed to disposal was done so with energy recovery.

We commit to zero landfill disposal of hazardous waste unless technically not feasible. In the case of disposal, we work with the disposal facility to identify the most appropriate method for treatment and disposal. Our

preference is to recycle waste whenever possible, but if that is not an option, we look at chemical treatment, followed by physical treatment, and finally incineration. In FY2021, no hazardous waste was sent to landfills.

LOOKING FORWARD: WASTE MANAGEMENT

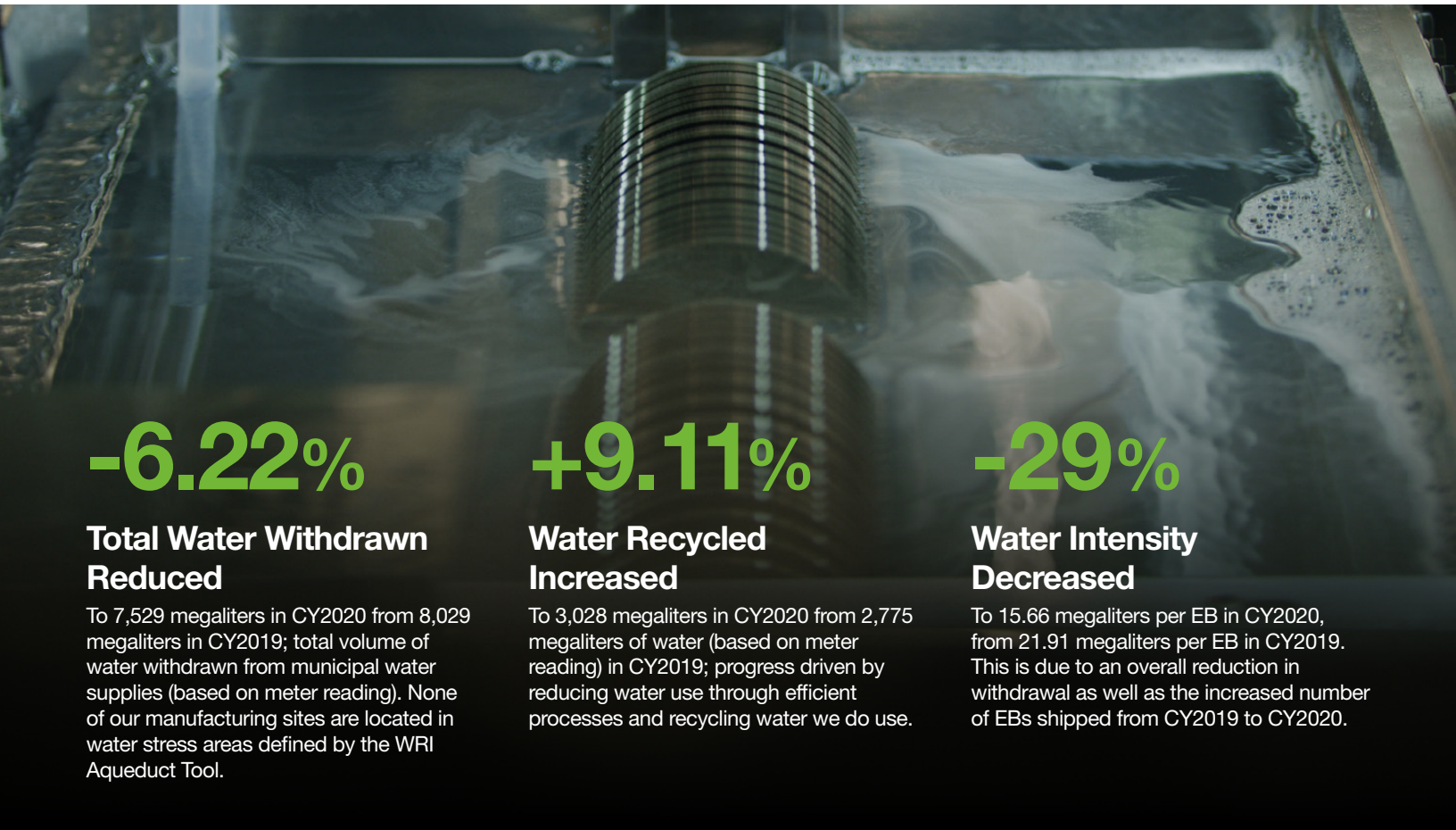
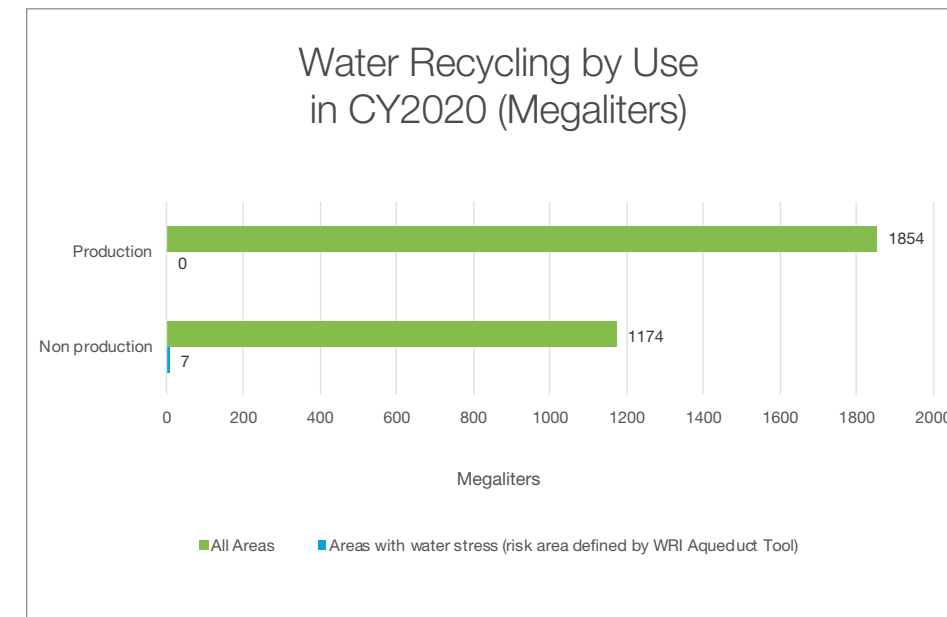
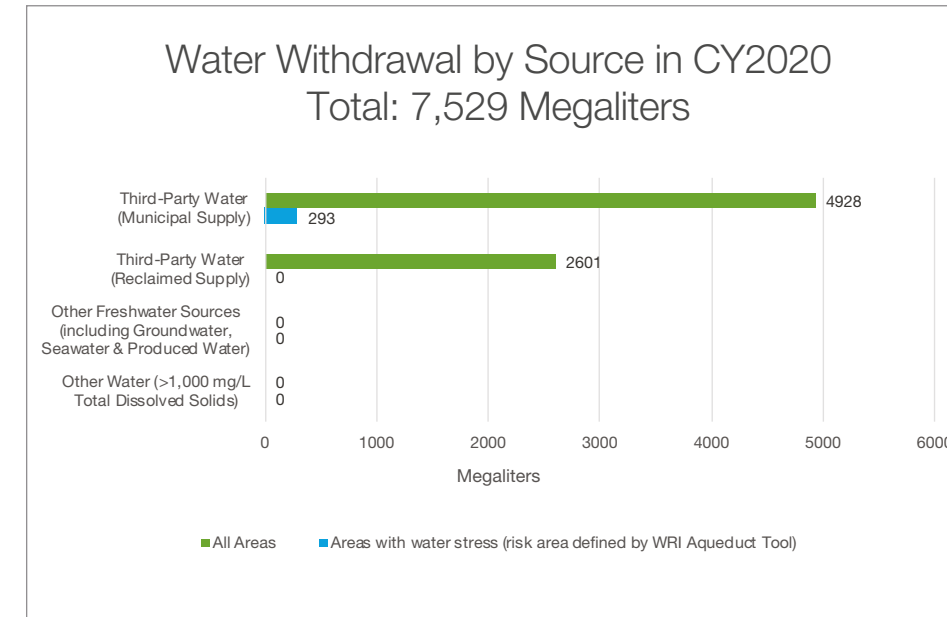
In FY2022, we will continue to implement waste minimization projects at our sites. Our goal is to keep our hazardous waste generation totals below 10,900 U.S. tons and to continue to decrease our hazardous waste per EB. Seagate remains committed to reducing our hazardous waste volume in line with reducing our environmental footprint. We have also set a non-hazardous waste diversion rate of at least 88 percent in FY2022.

Water Stewardship

Responsible management of water, a critical natural resource, is important to preserve and protect our global ecosystems. Our manufacturing processes use freshwater sourced from local watersheds shared with the local community. Freshwater is primarily used in direct operations and in our product value chain as cleaning agents at production sites, and to provide adequate cooling to sites and critical equipment.

Note that all water noted in our charts and data callouts is classified as Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids).

Wastewater generated from our operations is treated and discharged into waterways used for other purposes, for example, transportation and irrigation. This makes the proper treatment of water an important aspect of our operations to reduce the impact to downstream activities. Seagate applies measures to reduce water consumption, improve water recycling, and reduce water intensity. Our water metrics are reported annually based on the calendar year. Our [CDP Water Security Response](#) and third-party verification can be found on our external [Global Citizenship website](#).



-6.22%

Total Water Withdrawn Reduced

To 7,529 megaliters in CY2020 from 8,029 megaliters in CY2019; total volume of water withdrawn from municipal water supplies (based on meter reading). None of our manufacturing sites are located in water stress areas defined by the WRI Aqueduct Tool.

+9.11%

Water Recycled Increased

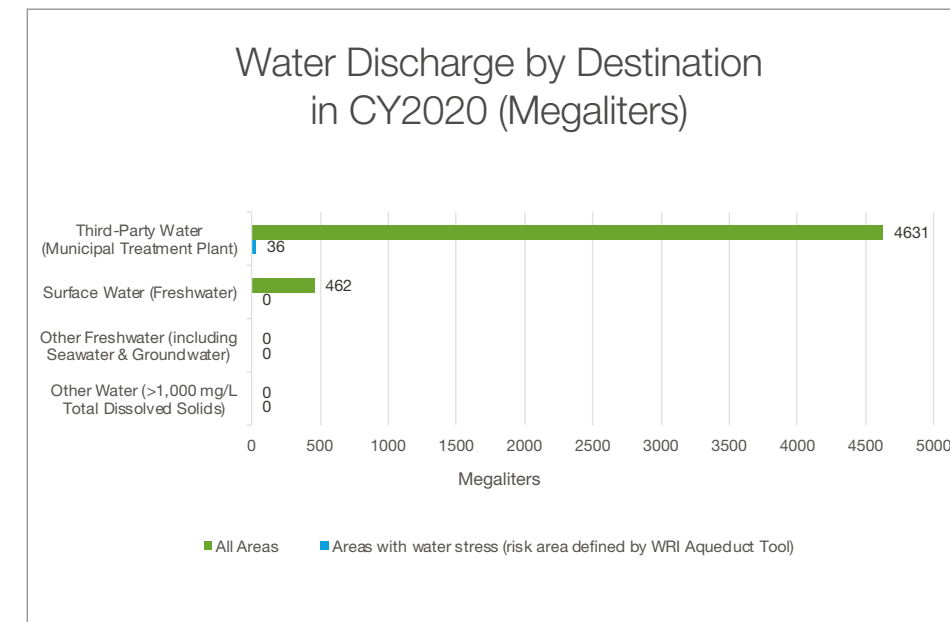
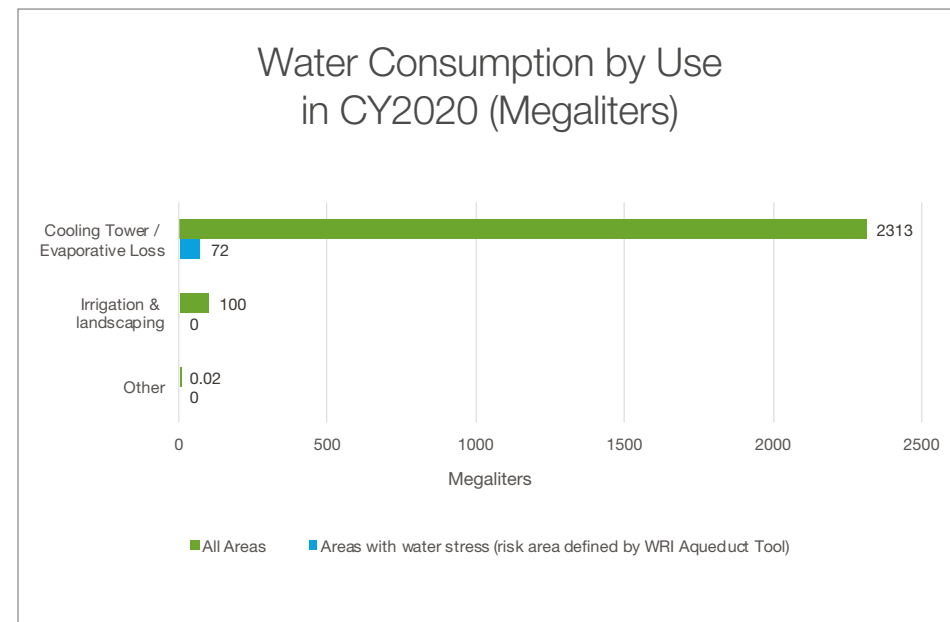
To 3,028 megaliters in CY2020 from 2,775 megaliters of water (based on meter reading) in CY2019; progress driven by reducing water use through efficient processes and recycling water we do use.

-29%

Water Intensity Decreased

To 15.66 megaliters per EB in CY2020, from 21.91 megaliters per EB in CY2019. This is due to an overall reduction in withdrawal as well as the increased number of EBs shipped from CY2019 to CY2020.

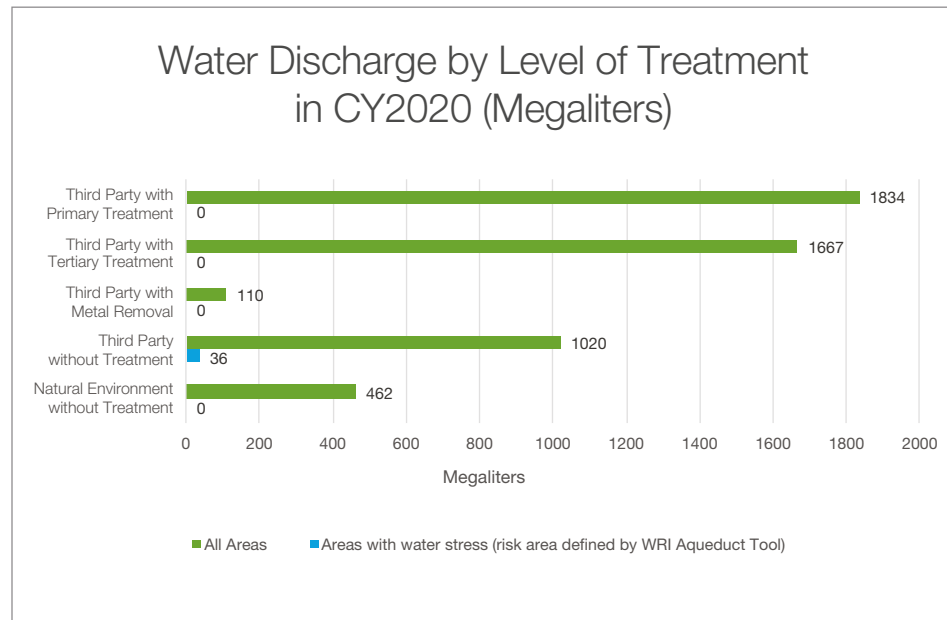
In CY2020, roughly 96 percent of Seagate’s water was used for cooling sites and critical equipment. The Senior Vice President of Business Sustainability and Transformation reviews water performance quarterly in alignment with water metrics tracked for water reduction. We monitor use at our sites on an annual basis, and when actual data is not available, we estimate use based on available data from other sites. We prioritize monitoring our manufacturing sites and largest R&D and administrative sites because they are the largest contributors to our water use. For smaller, office-based sites, water consumption is negligible. We perform annual water risk assessments for our prioritized sites using the WRI Aqueduct Tool taking into consideration the receiving water body and disclose information in our [CDP Water Security Response](#).



We have established a water discharge monitoring plan that takes into consideration process capabilities and legal requirements for our sites. We prioritize monitoring for our manufacturing sites and Seagate’s largest R&D and administrative sites. This prioritization is necessary because water discharge quality is monitored by standard effluent parameters at all sites where wastewater treatment takes place on site. Our remaining sites discharge to municipal sewers as per local requirements and do not negatively impact surrounding ecosystems.

An important aspect of our operations is the treatment and disposal of wastewater from our manufacturing processes. We follow local authorities’ minimum standards for the quality of effluent discharge in all operations locations. These standards include pH, Biological Oxygen Demand, Chemical Oxygen Demand, Suspended Solids, and mineral content, among other priority substances of concern—primarily heavy metals relevant to electronic processes. Our treatment plants are built and maintained to ensure they operate efficiently in treating the effluents from our processes. We have internal operating control limits set well below the minimum discharge standards to act as internal triggers to ensure both internal and local effluent discharge requirements are met. Internal control limits take into consideration regulatory standards and system design parameters.

The 462 ML listed as Natural Environment Without Treatment is in reference to wastewater which is channeled to a pond prior to final discharge.



Many Seagate sites also have online monitoring capabilities that are connected directly to the regulatory authority monitoring system. The regulatory authority confers Seagate permits to operate our treatment plants and set effluent discharge limits, taking into consideration

the receiving bodies of water. The third-party water-receiving bodies are managed by the municipality and are connected to the municipal water treatment sites. In FY2021, there was no non-conformance to discharge limits, therefore there was no corrective action needed.



CASE STUDY**Singapore Reclaimed and Recycled Water Project**

Our Recording Media Operations (RMO) in Singapore completed a project at scale to build a recycled water system. Natural water sources are limited in Singapore - 58 percent of fresh water is imported from Malaysia. To reduce the need for imported water, Singapore's Public Utilities Board (PUB) reclaims local wastewater and provides the reclaimed water at a reduced cost, mainly to support commercial industries.

The RMO project set out to implement new systems and enhance current operations to reduce our dependency and preserve this critical natural resource.

The first phase of the project was to maximize reclaimed water usage in tool processes. This was achieved by upgrading and increasing the capacity of the current reclaim water system by installing additional filtration tanks. In the second phase, Seagate implemented a system that would recycle wastewater for use in cooling towers and other operational processes.

Since operationalizing this project, Seagate has significantly reduced our dependency on reclaimed water from the PUB, and in FY2021 saved 658,132m³/year - the equivalent of \$1.14 million/year. We were also able to successfully claim 50 percent of the project cost from the PUB for meeting the project requirements. With our learnings from this project, we are exploring recycling wastewater in our other Singapore sites. Our Seagate facility in Singapore is committed to saving water continuously and supporting "Go Green" initiatives.

**LOOKING FORWARD:
WATER STEWARDSHIP**

In FY2022, Seagate plans to both reduce our water use and increase the amount of water we recycle. We will continue to invest in our treatment systems around the world to maintain compliance with all regulatory and permit conditions.

07



Our Employees

Guided by our values of Integrity, Innovation, and Inclusion, Seagate continued to put employees first, despite the challenges presented by the global pandemic.

The talent of our people makes us a leader in the industry, and at the end of FY2021, Seagate employed more than 40,000 colleagues in more than 27 countries around the world. With this large, global workforce, we leverage diversity of talent and diversity of thought each day, helping to create a more sustainable business. The success of Seagate depends on our ability to continue attracting, developing, retaining, and engaging a talented workforce.



FY2021 Global Employees: 40,110*

Total Employees by Region*

REGION	Regular Employees	Temporary Employees	Total Employees
Americas	11.30%	0.40%	11.80%
Asia	83.20%	0.30%	83.50%
EMEA	4.70%	0.00%	4.70%

Total Employees by Gender*

Categories may not add up to 100 percent because some employees chose not to disclose

GENDER	Regular Employees	Temporary Employees	Total Employees
Female	58.50%	0.27%	58.70%
Male	40.70%	0.50%	41.20%

GENDER	Full-Time	Part-Time	Total Employees
Female	58.50%	0.27%	58.70%
Male	40.70%	0.50%	41.20%

* Data compiled on information that is in the Human Resources Management System on the last day of the reporting period. Regular employees include full- and part-time employees. Temporary employees include interns and employees with fixed-term contracts. Time type is defined by applicable legislation where employees are located.

Seagate's New People Strategy Launched in FY2021

Seagate's business strategy is grounded in our values; to align with that business strategy we launched a new people strategy in FY2021. We believe that for our customers to trust and invest in us, we need to invest in our most valuable asset—our employees. Central to this is maximizing the employee experience throughout the entire "Employee Life Cycle" (ELC). Our ELC model is designed to grow and evolve, continuously ensuring:

- Opportunities for our employees to learn, grow, and explore various career paths
- An inclusive and equitable environment, offering room for diverse voices to be heard
- Access to meaningful benefits and rewards that support employees' health and wellbeing, and much more
- Offering managers new opportunities to learn and deploy critical skill sets in hiring, leading, and inspiring
- An understanding of how we can support employees in contributing to Seagate's success



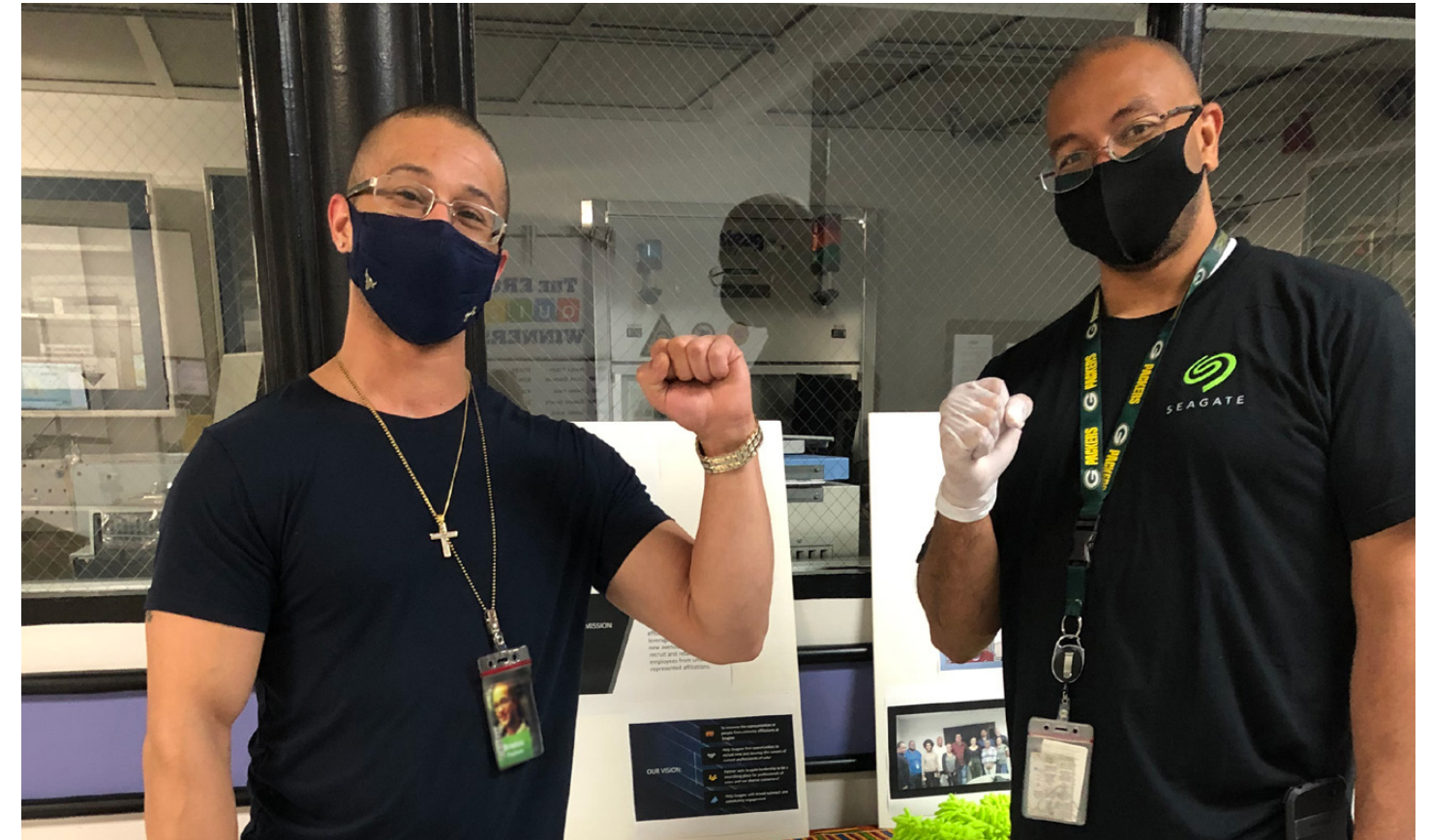
Employee Life Cycle Model

Our goal is to create better employee experiences, enabling a positive impact on employee engagement.

This supports customer satisfaction, shared success, and revenue growth. To facilitate our efforts, we migrated our Human Resource Management System platform to SAP SuccessFactors, which provides a world-class solution with a unified user experience across various ELC touchpoints including performance management, compensation, benefits, hiring, and goal setting. SAP also enables broader data and insights about our delivery of the employee experience.

Key Focus Areas for our FY2021 People Strategy:

GROW TALENT	INCLUDE AND ENGAGE	EMPLOYEE FEEDBACK
<p>Inner Mobility</p> <p>Launched an internal Artificial Intelligence (AI) tool to make opportunities for new roles, project involvement, and mentoring visible to employees who seek to build knowledge, gain experience, and explore other career directions.</p>	<p>Diversity, Equity, and Inclusion</p> <p>Continued our commitment to cultivate a diverse talent pipeline, enable a culture of equitable opportunities and rewards, and provide a safe environment for people to feel valued and empowered.</p>	<p>Engagement Survey</p> <p>Redesigned our Micro Survey into a broader engagement survey focused on the entire Employee Experience (e.g., everything an employee observes, feels, and interacts with) and introduced additional survey items on leadership, diversity, work-life balance, and our core values of Integrity, Innovation, and Inclusion.</p>
<p>Professional Development</p> <p>Increased learning options for all employees and provided targeted, on-demand, and facilitated training and resources to help leaders adapt to the rapidly changing work environment.</p>	<p>Internal Social Networking</p> <p>Leveraged the Yammer platform to further connect and engage with colleagues around the world.</p>	



LOOKING FORWARD: OUR EMPLOYEES

In FY2022, Seagate will continue to execute our people strategy as we prepare for a year of intense movement and development. We will continue to focus on growing our talent and looking at ways to identify skill gaps and offer programs to develop and upskill our employees. We will remain focused on and aligned to our values and demonstrate our commitment to our value of Inclusion. To support these commitments, our leadership team has added a “People Goal” performance metric to all people managers’ FY2022 goals.

CASE STUDY

Seagate Executive Leadership Pledge: To Be Supportive and Flexible During the Pandemic

Many employees continued to telework due to the pandemic in FY2021. Adding to the stress and anxiety caused by COVID-19 were the pressures put on employees with school-age children and family members who require extra care at home. Given these realities, our executive leadership team cascaded communications regarding the need for flexibility within teams. Guidelines and tools for these leader and manager-led conversations were provided on the Seagate intranet and discussed during manager meetings. Throughout the year, executives regularly

reviewed how best to enable employees to work productively while continuing to work virtually.

Seagate recognizes that a majority of our workforce at our manufacturing locations worked onsite during FY2021. These employees have been critical to our production lines and supply chain, without which we have no business. To those onsite employees, we continue to say, “Thank You,” and we appreciate their dedication in the “new normal” way of working.

“To Be” Leadership pledge to:

- To be considerate of family
- To be supportive and flexible for personal needs
- To be able to set boundaries and prevent video fatigue
- To be willing to use telework to develop your personal brand and uphold Seagate’s brand
- To be supportive of expenses that will help you do your job at home

“**Mission First - People Always!**”

We pledge to engage with our employees, and live and uphold our values and brand, in this ‘new normal’ work environment.

- Seagate Executive Leadership Team



Human Rights and Working Conditions

Our Human Rights Policy demonstrates our commitment to preserving, protecting, and promoting the fundamental human rights of others. Seagate adheres to the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization core labor principles, and the RBA Code of Conduct. Each of these standard is incorporated into our policies and procedures. Equal opportunity, nondiscrimination, and fair employment practices are also prioritized. Protecting human rights and following labor standards in all our operations (including in geographies that lack the regulatory protection or enforcement to manage concerns such as child labor) requires specific attention to the following:

[Read our Human Rights Policy](#)



COMMITMENT TO A RESPECTFUL WORKPLACE	OPEN COMMUNICATION	PROHIBITION OF CHILD LABOR	PROHIBITION ON FORCED LABOR	FREEDOM OF ASSOCIATION	CONDITIONS OF EMPLOYMENT
<p>We do not allow or condone any form of harsh or inhumane treatment.</p> <p>Seagate strives to create, foster, and maintain a work environment that's free from harassment, by proactively working to prevent such behavior. Seagate also promptly responds to, investigates, and addresses harassment complaints.</p>	<p>Our open door policy and philosophy encourage open dialogue between employees and managers.</p> <p>In addition to formal and informal complaint or grievance procedures, employees or other concerned parties have easy access to Seagate's Ethics Helpline to report complaints or concerns</p>	<p>Our policies oppose child labor, and we do not use child labor at any of our sites.</p> <p>We have established age 18 as a standard minimum age for employment at all locations, which complies with or exceeds local legal requirements. Through RBA Validated Audit Program (VAP) audits, there were no cases of child labor found in our operations in FY2021, and we believe our controls keep such cases at a low risk.</p>	<p>Our policies prohibit the use of any forced, bonded, indentured, or other compulsory labor.</p> <p>Our policies also prohibit our suppliers from using any forced, bonded, indentured, or other compulsory labor. Through RBA VAP audits, no cases of forced labor were found in our operations in FY2021, and we believe our controls keep such cases at a low risk.</p>	<p>We respect our employees' right to freedom of association in choosing labor organizations to represent them.</p> <p>We strive to maintain positive relationships with the unions, works councils, and employee associations that represent many of our employees; worldwide, approximately 14 percent of our employees are covered by collective bargaining agreements. Through RBA VAP audits, there have been no instances of violation of freedom of association found in our operations, and we believe our controls keep such cases at a low risk.</p>	<p>Seagate operates with reasonable working hours and rest days to maintain a positive and productive work environment consistent with the RBA Code of Conduct and local legislation, whichever sets the bar higher.</p> <p>Employees decide to accept employment after being fully apprised of the terms, conditions, practices, and expectations of their jobs. Employees are not required to surrender government-issued identification, passports, or work permits as a condition of employment.</p>

Annual assessments, in line with the human rights framework found in the RBA Code of Conduct, are conducted to identify and mitigate labor and human rights risks at our manufacturing sites in the United States, Malaysia, China, Thailand, the United Kingdom, and Singapore, which collectively represent slightly more than 86 percent of our workforce.

Internally, our Human Rights policy is published in Chinese, English, Malay, and Thai. It is shared with all new hires during onboarding, posted at our sites, and included in our annual policy acknowledgment program. During the FY2021 annual acknowledgment process, the policy was communicated to over 17,000 employees globally, and over 98 percent of those reviewed and acknowledged the policy. Additionally, 100 percent of our security personnel who are Seagate employees received human rights training in FY2021.

LOOKING FORWARD: HUMAN RIGHTS AND WORKING CONDITIONS

In FY2022, Seagate will remain committed to labor and human rights, and we will continue our annual labor and human rights risk assessments, and our internal and external RBA labor audits at our manufacturing sites. We will also share additional metrics and plan to increase the Board of Directors' visibility of human rights and working conditions throughout the year.



Seagate Thailand was awarded the national 2020 Excellent Practices Establishment on Labour Relations and Welfare for the 13th consecutive year. This continuous achievement clearly demonstrates that our Thailand manufacturing sites have been carrying out exceptional efforts in compliance with the labour relations and welfare standards.

Talent Acquisition and Retention

Seagate constantly seeks to attract and retain a talented and diverse workforce. Our recruitment processes focus on finding talented and engaged individuals both internally and externally. We recruit externally to align our workforce with our business and

identify skilled individuals that can bring creative and innovative solutions. We invest in our current talent pool, which prepares them for future opportunities. Internal candidates are considered first when new roles become available, which ties back to our value of Integrity.

Internal Mobility

In FY2021, we launched our new internal mobility and career development tool called Career Discovery. This platform leverages AI technology and enables our employees to map their careers by networking and participating in internal part-time projects and new full-time jobs. Career Discovery helps to create positive employee engagement by developing our talent and providing new and exciting possibilities for our workforce, which increases employee engagement and retention, and reduces time to hire and onboard. We encourage our employees to check for current job postings of interest through our Career Discovery site or sign up to receive a weekly digest of opportunities.



Seagate believes in Equal Employment Opportunity (EEO) and recognizes that a talented, diverse workforce provides a competitive advantage. We are committed to providing an environment where all individuals are treated equitably, and where people feel their talents and potential are recognized. Our global equal opportunity policy prohibits discrimination in all employment practices based on age, race, color, ancestry, ethnic or national origin, physical or mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy or perceived pregnancy, childbirth, breastfeeding, or related medical conditions), gender (male or female), gender identity (our internal sense of our gender) and gender expression (how our behavior, appearance and interests reflect our gender), sexual orientation, perceived or actual religious creed or political opinion, military and veteran status, taking or requesting statutorily protected leave, taking or requesting a reasonable accommodation for a protected basis, or other basis protected by applicable law.

Interns FY2021

381

interns hired globally, and where feasible, interns worked remotely

95%

of global interns said they would like to accept a new position at Seagate if offered

98%

would refer a friend to Seagate

86%

of United States managers surveyed would re-hire their intern beyond the internship if able

35%

of United States interns received extensions to work for Seagate full or part-time beyond their projected end date

University Relations

Seagate invests in the future by strategically recruiting on campuses for interns, with the goal of converting to graduate hires. We focus on hiring technical and non-technical graduates from universities near our sites around the world, and in FY2021, we hired 172 graduates. We regularly partner with campus minority organizations and 60 percent of our events (18/30) in the United States were specific to diversity outreach through campus organizations.

In FY2021, we hired 381 interns at our sites globally, and where feasible, interns worked remotely. During their time at Seagate, student interns gain valuable

industry experience and contribute to many departments at the company. These interns gain exposure to technology through project-based work. At the conclusion of their projects, they prepare and present a summary of their internship for their group leadership and colleagues. When surveyed, 95 percent of global interns said they would like to accept a new position at Seagate, if offered, and 98 percent said they would refer a friend to Seagate. Among managers, 86 percent of United States managers surveyed would re-hire their intern beyond the internship if able. 35 percent of United States interns received extensions to work for Seagate full or part-time beyond their projected end date.

Building a Diverse Workforce

In FY2021, Seagate continued to focus on building a more diverse workforce by recruiting talented candidates around the world. Taking steps to ensure hiring slates are inclusive of diverse candidates, Seagate strives to create a hiring process that is equitable, inclusive, and free from unconscious bias.

We are creating a pipeline of diverse talent in the United States through partnerships with local and national diversity organizations, including the Society of Women Engineers (SWE), National Society of Black Engineers (NSBE), and the Society for Hispanic Engineers, as well

as engaging in community outreach for groups including LGBTQ+ and United States veterans. In FY2021, in partnership with NSBE at the University of Minnesota, we provided opportunities for Black and minority engineering students to connect with Seagate, learn about our values, and interview for internship opportunities.

In FY2021, we strengthened our talent pipelines in the United States military and veteran community. We partnered with the Army PaYs (Partnership for Youth Success) program, providing opportunities to military service members seeking to gain experience and skills



Seagate values the unique experience military professionals bring to the workplace and encourages veterans who are transitioning from active duty to a civilian career, reserve members, and military spouses to consider a range of career paths at Seagate.

from the private sector. This program underpins Seagate’s commitment to supporting United States military and veterans, and to strengthening our talent pipelines across the United States military and veteran community. Seagate collaborated with several Air Force Transition Assistance Program (TAP) Offices to provide United States Air Force veterans who have strong maintenance (Aircraft, Missile, Facilities, Munitions, & Vehicle) backgrounds with a link to a post-Air Force Technician career opportunity at Seagate’s Minnesota wafer manufacturing operation. We also began working with the United States Department of Defense (DOD) SkillBridge program. This is an opportunity for United States service members to gain valuable civilian work experience through specific industry training and apprenticeships during the last 180 days of service. SkillBridge connects Service members to Seagate in real-world job experiences. Our University Relations

team expanded their military outreach as well, with two information sessions in Colorado for military students and adult learners.

Seagate’s Facebook and Instagram platforms provide an opportunity to share the “Life at Seagate” story with candidates on social media, and illustrate the diversity of our employee base through our global offerings. We are also active on key recruitment sites across the globe including JobStreet, LinkedIn, and Glassdoor.

To increase outreach with women candidates, we partner with Fairygodboss. For the second year in a row, Seagate was named one of the Best Technology Companies for Women in 2020. To be considered for this honor, firms are ranked by Fairygodboss based on positive reviews from employees about the company’s commitment to gender inclusion, senior leadership support, and workplace culture.

Recruiting/Hiring

FY2021 Global Employee Hires: 5,819 (Overall hire rate 14.5%)

HIRE RATE BY REGION		HIRE RATE BY GENDER		HIRE RATE BY AGE GROUP	
Americas	14.20%	Females	14.50%	<30	40.10%
Asia	14.60%	Males	14.50%	30-50	31.90%
EMEA	12.90%			>50	2.00%

Data reflects self-reported information from employee hires captured in our Human Resources Management System during the reporting period and excludes agency temporary employees. Hire rate is calculated as the number of hires divided by employee headcount.

Retention

Seagate prioritizes retaining and developing our talented workforce as we believe that reducing turnover helps retain knowledge and deliver deeper, longer-term customer relationships. Our voluntary annual turnover for non-operator employees remains below 10 percent, which is below our industry average. Seagate offers retirement transition services, such as pre-retirement planning information and resources, for employees that are leaving the

workforce due to retirement. In FY2021 we introduced a phased-retirement pilot program in the United States, the United Kingdom and Singapore. This voluntary, employee-initiated program provides a period of transition from working full-time to part-time, prior to leaving Seagate on an agreed-upon date. In the United States, in situations where reductions in workforce are required, we provide outplacement services and in other countries, we align with legal mandates.

FY2020 Voluntary Turnover: 3,386 (Overall voluntary turnover rate 8.4%)

VOLUNTARY TURNOVER RATE BY REGION		VOLUNTARY TURNOVER RATE BY GENDER		VOLUNTARY TURNOVER RATE BY AGE GROUP	
Americas	7.70%	Females	8.40%	<30	21.20%
Asia	8.90%	Males	8.50%	30-50	5.50%
EMEA	3.00%			>50	3.80%

Data reflects regular employee voluntary turnover captured in our Human Resources Management System during the reporting period. Turnover rate is calculated as the number of voluntary terminations divided by employee headcount.



LOOKING FORWARD: TALENT ACQUISITION AND RETENTION

In FY2022, Seagate will standardize our talent acquisition hiring strategy, update our employee branding, expand our onboarding program, and continue internal mobility expansion and engagement. We will continue our efforts to attract, retain, and develop diverse talent. In the United States, through strategic partnerships with diversity outreach with universities and the military/veterans' community, as well as with national organizations supporting women and people of color, we will strengthen our talent pipelines and forge valuable relationships with diverse communities and the people they represent.

Diversity, Equity, and Inclusion

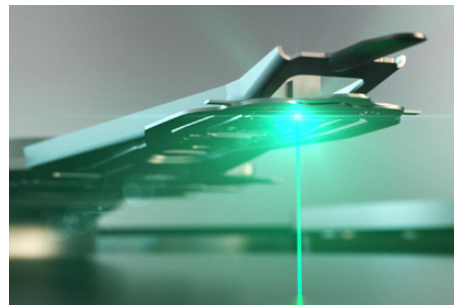
We recognize that diversity is one of the key drivers of Seagate's continued success as a data storage leader. But diversity alone is not enough. To build a thriving

culture, we must embrace inclusion and actively pursue solutions that support racial and gender equity, both within our workforce and our communities.

[Read our Diversity, Equity, and Inclusion Annual Report](#)

DEI In Action

Throughout FY2021, Seagate undertook initiatives and efforts in support of DEI. Some key highlights include:



Diversity in Innovation Pledge

With over 5,600 United States patents, we understand the value of diverse experiences, backgrounds, and identities when it comes to innovation. That's why we're a proud signatory of the Diversity in Innovation Pledge, joining over 25 founding pledge companies in a shared commitment to implementing best practices in support of increasing inventor diversity.

[Learn more](#)



CEO Action for Racial Equity Fellowship

In FY2021, strengthening our DEI commitments, Seagate proudly joined the CEO Action for Racial Equity Fellowship, a first-of-its-kind initiative mobilizing diverse talent and expertise from across industries, with the purpose of bringing about a more just and equitable society for all.

[Learn more](#)



Fostering LGBTQ+ inclusion

Whether it's providing gender transition support or including gender pronouns in our official email signature template, we're committed to taking every opportunity to support and embrace LGBTQ+ awareness and inclusion. Throughout FY2021, completions of our LGBTQ+ Ally Training grew by 93% year over year.



Developing and elevating black leaders

Through our strategic partnership with McKinsey's Black Leadership Academy, employees from Seagate attended workshops and networking events with industry peers, building valuable skills to help them grow and achieve as business leaders.



Building a neuro-inclusive workforce

Throughout FY2021, we continued to elevate the conversation of neurodiversity in the workplace, launching a second Minds of All Kinds employee resource group and increasing participation in our Neurodiversity 101 digital training. In addition, we partnered with Uptimize, a leader in neurodiversity education, to offer virtual team trainings on the topic of neurodiversity in the workplace. Neurodiversity is defined as the differences in how our brains function, leading to diverse ways of thinking and seeing the world.



Breaking unconscious bias

In 2018, we launched a global effort to equip our leadership and workforce with the tools to mitigate unconscious bias, and three years later, our commitment to mitigating unconscious bias in our workplace is just as strong. To date, more than 2,800 managers and above have attended bias workshops, spanning 14 sites around the world.

"At Seagate, Inclusion is so much more than just a core value—it's how we lead and conduct business all over the world. When we lead with Inclusion, we create a space for diverse voices to be heard, valued, and elevated, which in turn inspires greater innovation throughout our products, technologies, partnerships, and communities.

From our investors, Board of Directors, and customers to our employees and their extended communities, the impact that we can have as a global leader is powerful and meaningful. While there is much work to be done, I am proud of what we've accomplished in supporting diversity, equity, and inclusion, and invite you to explore this report to learn more."

- Dave Mosley, CEO

Supporting ERGs

One way that Seagate supports a culture of inclusion is by empowering diverse Employee Resource Groups (ERGs). These voluntary, employee-led communities provide a safe space for discussion, connection, networking, and professional

development. With over 2,300 global members representing nine ERGs and over 25 local chapters, ERGs are a vital component of our commitment to building a workplace culture where all employees feel safe, respected, and valued.



Support human rights and greater equality through networking and professional development events. Engage in efforts that promote diversity and inclusion within Seagate and the community.



Foster a community of women and allies within Seagate by providing networking, mentoring, and development opportunities to encourage personal and professional growth.



Raise awareness of and provide support to people of minority affiliations within Seagate. Support inclusion through community outreach, education, and leadership engagement.



Advocate for and support the recruitment and retention of neurodiverse people. Increase workforce diversity and drive innovation by focusing on capabilities rather than limitations.



Engage in community service and professional advancement opportunities, and raise awareness of the diverse cultures and customs of Asia.



Develop a safe space to share resources and build connection around the topic of faith. Provide learning and outreach of diverse faiths, support inclusion, and foster community.



Establish a welcoming community for those early in their careers to network with peers, learn from mentors, and collaborate with colleagues. Help attract and retain new and diverse talent.



Encourage networking and cultural education experiences for those with Chinese heritage. Engage in community outreach, and promote Chinese cultures and customs.



Foster support, networking, and development opportunities to military and veteran employees. Support veterans through community outreach and brand engagement.



Ensuring Fair, Equitable Pay

Seagate believes that all employees should be paid fairly and equitably, reflecting our DEI commitments and our values of Integrity and Inclusion. To deliver on that commitment, as well as remain competitive in the market for talent, Seagate analyzes the competitiveness of our programs at least annually to ensure compensation pay ranges and targets are in line with similar companies that are seeking like talent. In addition to market analysis, we continually benchmark compensation best practices to provide employees with a competitive total compensation package.

We also review our compensation practices on an annual basis to ensure pay is fair and equitable. In partnership with an independent third-party, we look at pay parity based on gender, and in the United States, we look at race as well. Additionally, Seagate provides development programs that are designed to eliminate bias in all employment decisions including performance and compensation.

Diverse Representation

Diversity is not only a key metric of Seagate’s success as a competitive, global company, but it is also a measure of how well we reflect the rich cultures, experiences, and communities of our more than 40,000 colleagues around the world. From Wuxi, China to Bloomington, Minnesota, we are committed to being a place where all employees feel safe, respected, and welcomed for the unique diversity they bring to the table.

JOB CATEGORY	BY GENDER*		BY AGE GROUP			MINORITY/NONMINORITY*	
	Female	Male	<30	30-50	>50	Minority (US Only)	Nonminority (US Only)
Board**	20.00%	80.00%	–	10.00%	90.00%	20.00%	80.00%
Management	26.50%	73.40%	0.10%	53.50%	46.40%	29.50%	66.20%
Technical employees	19.10%	80.90%	13.10%	66.80%	20.11%	42.40%	53.50%
All other employees	77.30%	22.60%	24.90%	63.20%	11.90%	46.10%	49.19%

Diversity of Employees information is self-reported

* Categories may not add up to 100 percent because some employees chose not to disclose

** Non-Employee Board Members

JOB CATEGORY (US ONLY)	Asian	Black or African American	Hispanic or Latino	White	Other*	Not Available or Not Disclosed
Management	24.60%	1.70%	2.40%	66.20%	0.80%	4.30%
Technical employees	35.60%	1.70%	3.10%	53.50%	2.00%	4.10%
All other employees*	30.30%	9.00%	5.00%	49.10%	1.80%	4.80%

* Other includes the classifications: Native American or Alaska Native, Native Hawaiian or Pacific Islander, and “Two or More Races”. Data is compiled based on information that is in the HR Management System on the last day of the reporting period.



CORPORATE EQUALITY INDEX 2021

Seagate is proud to once again receive a 100 percent perfect score on the Human Rights Campaign’s Corporate Equality Index (CEI), earning the designation of Best Employer for LGBTQ Equality—for the third year in a row. This designation is given to companies that score perfectly across all three categories of the CEI: (1) Workforce Protections, (2) Inclusive Benefits, and (3) Supporting an Inclusive Culture/Corporate Social Responsibility.

Human Rights Campaign Foundation’s Corporate Equality Index is recognized as a leading national benchmarking tool on corporate policies, practices and benefits pertinent to lesbian, gay, bisexual, transgender and queer employees.



LOOKING FORWARD: DIVERSITY, EQUITY, AND INCLUSION

In FY2022, Seagate intends to strengthen our commitments to support gender and minority representation, especially in leadership positions. We will also actively engage with community partners to build stronger, more diverse pipelines for minority talent, and to that end, will launch inclusive management training aimed at helping our leaders better understand how to lead inclusively.

Employee Performance, Development, and Engagement

Seagate aspires to create an environment that brings out employee performance through rich conversations and coaching, collaboration, and diverse thought. This is underpinned by our performance management process, where employees develop goals each year via conversations with managers and our online Virtual Coach resources. Ongoing dialogue around these goals is intended to help managers and employees identify strengths, improve outcomes, and close performance gaps. We provide talent management and learning solutions that enable our employees to reach their full personal and professional potential at Seagate.

Performance Management

Building our talent from the ground up is an essential part of our people strategy at Seagate. Managers have the power to influence our workforce by determining and uplifting our talent now and for years to come through our goal setting and performance review cycles. Seagate’s operator employees receive direct ongoing feedback and coaching throughout the year from their supervisors. Our non-operator employees are encouraged to develop two to three clear goals aligned to our overall company strategy. In FY2021 we set a goal of 99 percent of non-operator employees participating in the performance management process; 99 percent completed the goal setting and year-end review process in our online system, and 100 percent* received a year-end goal review with their manager.

Learning and Development

As part of the performance management process, managers and employees work together to build personalized development plans. In FY2021 99 percent of our non-operator employees had created development plans. Whether our employees want to go deep into their craft as a subject matter expert, or they want to expand their skill set by moving around and trying something new, Seagate provides development programs to enhance career growth and development. Employees can build skills, gain experience, and learn new things through:

- Face-to-Face training
- Seagate E-Learning and Classroom Learning Opportunities
- LinkedIn Learning Self Study Courses and Programs
- Strategic Internal Programs (such as: Breaking Bias, Citizen Data Scientist, Firmware Engineering, Leadership Training, Management Essentials)
- Tuition Reimbursement for Outside Degree Programs
- Internal Mobility Opportunities through Career Discovery
- International Assignments
- On-the-Job Training
- Seminar and Conference Opportunities
- Mentoring and Coaching



*This process does not include 1) operator employees, 2) sales and sales management employees, and 3) employees hired after 01-Jun-2021.

Average Training Hours

NON-OPERATOR*		OPERATOR
GENDER	AVERAGE HOURS	Our operator employees have a comprehensive training plan that includes a combination of classroom training and on-the-job training based on job function. Training needs for operator employees are managed and tracked at our manufacturing sites.
Female	11.5	
Male	11.9	

*Includes training from the Seagate Learning Platform, LinkedIn Learning, and the Leadership Program. Change in reporting methodology from prior year to only include non-operator by gender as this information is captured in our learning management system and operator training is tracked across multiple platforms.

We are also focused on our next generation of leaders and in FY2021, we continued our Organizational Talent Reviews (OTR) process where managers evaluate each member of their organization to identify employees' potential and determine successors. The outcomes of the OTR process help leaders determine our "Top Talent" employees and where they can maximize their development resources.

Our leaders and managers are offered opportunities to learn effective models and tools from industry experts, and share insights and reflections with peers to further sharpen their management and leadership skills. Our Management Essentials training provides new and experienced managers with the opportunity to build or refresh leadership skills. This blended learning approach uses self-paced modules in conjunction with live virtual sessions. It focuses on individual and team goal setting, development of effective learning plans, evaluating performance, and how to help increase a team's diversity of thought and engagement.

In FY2021, we launched our Leadership Essentials Program. The three cohorts were comprised of 101 employees from multiple job levels (Professionals, Managers, and Directors) across the globe (41 percent Americas, 52 percent APAC, 7 percent EMEA). The main objective of the program is to equip our leaders with the ability to lead with character, competence, commitment, agility, and a 'Mission First, People Always' approach. The multi-week digital leadership journey is hosted by an external training partner and organized into three phases—Lead Yourself, Lead Teams, and Lead with Purpose. The program creates an engaging, iterative development process that allows

time to translate knowledge into action and explore practical application. Our goal is to expand this program and support all director-level employees in completing the program within the next two years.

Our Career Discovery program is also a component in the development of our employees. Career Discovery helps our employees find internal opportunities to grow their careers. It also gives employees the opportunity to find and work on projects in other functions within the organization, where their skillset and expertise might be well suited, or gives them the opportunity to learn something new. The tool is also a place where employees can find or become a mentor, to allow employees to share career advice, knowledge, networking, and skill development.

Employee Experience and Engagement

A positive employee experience is critical to attract, retain, and engage the talent we need to remain a successful company. Seagate regularly surveys employees to solicit feedback and to understand employee engagement, as well as employee perceptions on topics such as leadership, development, Seagate core values (Integrity, Innovation, and Inclusion), and belonging.

In our FY2021 survey cycle, Seagate expanded into a broader employee experience survey, asking questions that touched on the entire Employee Life Cycle, and additional leadership, diversity, and work-life balance questions. The survey concluded in early 2021, with more than 36,000 global employee respondents (92 percent participation rate). Just as in years past, all responses were confidential so employees can freely respond and share their feedback.

The Three-Step Action Process



In this last survey, we also introduced customized results that revealed key drivers of engagement for each organization. Once the survey concluded, results were analyzed, then shared with management. Managers then followed the new three-step process

to *Understand, Share and Take Action!* Then they reviewed and evaluated their data, shared their data with their teams and discussed results, and then built targeted action plans with their team.

LOOKING FORWARD: EMPLOYEE PERFORMANCE, DEVELOPMENT, AND ENGAGEMENT

In FY2022, Seagate will continue to develop and upskill our employees in leadership skills, technical skills, core people skills, and more. We will continue our Management Essentials program with an intermediate series featuring expanded topics in a blended learning format. We will also launch additional cohorts of our Leadership Essentials Program and expand our Talent Acceleration Program—a strategic global initiative that offers various tracks to increase our employees' capabilities in critical skill sets. To support these activities, our learning system will be added to the SAP SuccessFactors platform to deliver and align with Seagate's standard global employee experience and be a one-stop-shop for learning opportunities to help employees develop their skills. Our annual employee experience survey will continue to be a valuable vehicle in providing employees with an opportunity to give anonymous feedback, encourage manager and employee conversations, provide managers with suggestions to create impactful action plans, and deliver employee engagement metrics and key engagement drivers to track over time.

Benefits and Wellbeing

Seagate's Total Rewards program is a key component of our people strategy and is designed to attract, motivate, and retain employees. Key components of the Total Rewards program are employee health benefits and wellbeing programs. Our benefits are benchmarked to local market practices, industry norms, and cultural requirements, and reflect our standards as a competitive, multi-national organization. Our wellbeing programs provide resources to support employees in living a healthy lifestyle, and promote physical and mental health, as well as financial acumen.

While plans differ geographically, all offer value and flexibility in support of Seagate employees, and, in some cases, their dependents. All regular full-time employees are offered comprehensive benefits coverage, including health care, wellness programs, parental leave, paid time off, retirement savings opportunities, life insurance, and equity ownership opportunities. Specific benefits offered vary by country. Our global Healthy Journeys wellness program seeks to educate, encourage, and support our employees as they work on achieving their health and wellness goals. Because our benefits

programs are managed at a country or site level, the Healthy Journeys program varies from location to location. All employees have equal access to the programs offered through Healthy Journeys. Some of these offerings are in-person and some are virtual. COVID-19 has impacted the way in which we have offered support, with more focus on virtual programs, but it has not changed our commitment to support employee overall wellbeing.

APAC (Asia Pacific)

In Asia in FY2021, we lived our Healthy Journeys vision by supporting a culture of health and wellbeing for our employees. We continued our Self-Care campaign into early FY2021, offering simple and easy self-care tips. This campaign encourages employees to “check in” and learn daily tips on topics such as mindfulness, self-compassion, and nutrition. Overall, the Self-Care campaign attracted 7,300 participants and garnered 28,000 check-ins.





Seagate also launched Wellbeing 365 for the entire region in FY2021. This program offers our employees and their dependents access to qualified providers who can support them with a variety of life issues in order to enhance their emotional, social, financial, and physical wellbeing. Wellbeing 365 includes a hub that provides comprehensive online resources such as articles, tips, and toolkits that can be accessed any time. In China, Singapore, and Thailand we offered health screenings and more than 80 percent of employees at these locations completed their checks either on or offsite. Toward the latter part of FY2021, we hosted an onsite vaccination program for our employees in China and India, which will continue in FY2022.

EMEA and the United States

In EMEA and the United States, a video-based wellness platform was rolled out in FY2021, eliciting positive feedback from employees on this virtual offering. The platform provides access to thousands of video-based programs focused on exercise, nutrition, resilience, and stress management as well as financial education. Seagate encouraged employee participation in these online offerings by providing raffle prizes as incentives for completing various challenges on this portal. In addition, for employees in the United States who wanted personalized health coaching, we added a virtual health coaching option with a licensed coach through our medical plan vendor. To support employees' mental wellbeing, we continued to offer several Employee Assistance Program webinars on the topics of resilience, fitness essentials, stress management, and financial wellbeing.

Legacy Program

In FY2021, Seagate introduced a pilot program in the United States, the United Kingdom, and Singapore called the “**Legacy Program**.” This program aligns with our people strategy, which is designed to enhance the employee life cycle from hiring to retiring. The Legacy Program provides a period of transition available to certain eligible professional and managerial employees who are ready to transition out of their employment with Seagate. The Legacy Program offers a phased approach, where employees will:

- Work a reduced schedule
- Transition their expertise to other employees, or take on a mentor role; and/or
- Undertake a project of fixed duration to see through to completion

The Legacy Program is a voluntary, employee-initiated period of transition from working full-time to part-time, prior to leaving Seagate on an agreed upon date. This program is being reviewed for possible expansion to include additional job levels to support employee desires as well as the needs of the business.

Unleashing Creativity: Celebrating Families with Children’s Drawing Contest

Family is one of the most important facets of our lives—and especially so during the COVID-19 pandemic. To encourage quality family bonding time, Seagate’s Total Rewards team organized a children’s drawing contest that was open to children of Seagate employees across the company’s Asia-Pacific sites. With the theme of “Family” to guide them, participants were asked to show what family meant to them through their drawings.

The contest drew nearly 300 submissions, with an array of impressive artwork. With three categories for children ages 3 to 6, 7 to 12, and 13 to 15, submissions were judged based on theme, creativity, and art proficiency. The top 20 submissions from the 3-to-6 and 7-to-12 age categories each received a set of coloring stationery and a Lego set, respectively. These prizes promote and encourage employees to spend quality time with their children and families.



LOOKING FORWARD: BENEFITS AND WELLBEING

In FY2022, Seagate will continue to operationalize and promote our global health and wellbeing programs with both agility and sustainability through and beyond the pandemic. We will continue to promote digital health activities such as virtual doctor visits, virtual physical therapy (United States only) and virtual counseling appointments for employees in countries where these are available. We will also promote mental wellbeing with country specific programs. Once COVID-19 controls and thresholds permit, we will re-introduce onsite programs and health screenings for our employees.

Health and Safety

The health and safety of Seagate employees, contractors, and visitors is an important aspect of our organization. The pandemic has highlighted the important connection of workplace health and safety, and the role it plays with our visitors, contractors and our communities. Seagate’s tireless efforts and rigorous EHS programs and standards have ensured that we operate to the highest level encompassing all factors that impact the health, safety and wellbeing of our employees.

All Seagate locations and work activities are covered under the health and safety management systems, and all manufacturing sites have their health and safety management systems certified to ISO 45001. Our global health and safety standards, as well as our accompanying management systems, frequently go beyond country or industry-level guidelines.

In FY2021, Seagate remained a safe place to work and continued to perform well under safety and health industry averages, based on calculations determined by the United States Occupational Safety and Health Administration (OSHA). Seagate uses the OSHA definitions for injury types and injury rates.

The hazard profile of Seagate is typical of an electronics manufacturer and includes slips, trips, and falls, and ergonomic injuries among others. Our current health and safety management systems support continuous improvement across our risk reduction and mitigation efforts. The strategies we have implemented for reducing risks associated with work-related injuries and illnesses are backed by more than a decade of collecting health and safety performance indicators.



GLOBAL HEALTH AND SAFETY BY THE NUMBERS IN FY2021	AMOUNT
Work-related fatalities	0
Recordable case rate ¹	0.23
Days-away case rate ²	0.12
Health and Safety regulatory visits hosted	67
Notice of violation findings	None
Fines levied	None
Health and Safety eLearning courses held and completed with “satisfied” completion status ³	91,517
Meals served globally per month (average) ⁴	587,680
Foodborne illnesses reported	0
Miles that Seagate bused employees	5,777,601 miles
Vehicle incidents per million miles traveled ⁵	1.7

¹ Total Recordable Case Rate (TRIR) Total Recordable Incidents x 200,000 / Total Hours Worked

² Lost Workday Rate (DART-L) Total Lost Workday Incidents x 200,000 / Total Hours Worked

³ Examples of EHS eLearning courses include: Office Production and Remote Ergonomics, Laser Safety, Confined Space Awareness and Permit Required, Electrical Safety Awareness, Lockout Tagout, Chemical Handling, and General EHS Awareness. These courses are offered to employees and contractors on an as needed basis. Contractors are required to take several Seagate trainings as well, such as our Contractor Safety training.

⁴ Seagate has a formal food safety program at all of our sites; this number was significantly impacted by COVID-19 and site café closures

⁵ All incidents are investigated and actions are taken to prevent reoccurrence. This includes both Seagate contributed and third party contributed accidents.



Over 50 percent of all work-related injuries are caused by two incident types - slip, trips, falls and Ergonomic Musculoskeletal Disorders. Seagate has extensive programs, initiatives, training, and communication dedicated to incident reduction in these two areas both at site and global levels. Company and site scorecards reflect targets dedicated to incident reduction, and hazards and risks are identified through risk assessments to establish the required hierarchy of controls and response to these focus areas of concern.

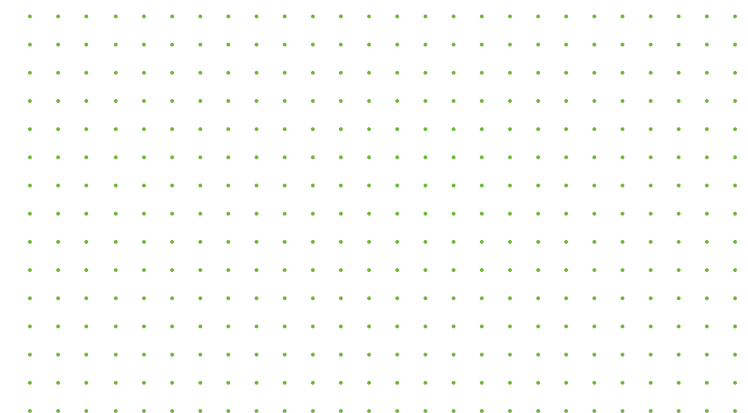
This data is incorporated into our total hours worked and recordable/lost time incident data for employees, contractors, interns and agency temps under Seagate control. No workers have been excluded except for those not within Seagate control whose hours and incidents are reported through their respective organizations.

To mitigate the likelihood of work-related hazardous events or exposures and prevent negative outcomes to employees, contractors, interns, agency temps, assets and other resources, Seagate thoroughly and regularly evaluates the risks and hazards relevant to our operations, services, and sites. Seagate's top identified risks include COVID-19; ergonomics; slip, trip, falls; chemical storage; and handling and struck-by injuries. This risk assessment process is conducted by trained employees and a cross-functional group of subject matter experts to ensure workers at all levels participate in the identification and elimination of hazards and the implementation of hierarchy of controls.

The Environment, Health, Safety and Sustainability (EHS&S) Policy reinforces Seagate's commitment to a safe workplace underpinned by our values of Integrity, Innovation, and Inclusion. This policy, along with site initiatives and training programs, supports the active collaboration, consultation and participation of employees and other stakeholders such as safety representatives, agency temps and contractors. This empowers every worker to actively identify and eliminate hazards, anonymously report concerns, incidents and near misses, and exercise the "stop work authority" without reprisal.

Involvement is enabled through participation in site safety committees, emergency response teams, incident investigation teams, risk assessments and tools such as safety suggestion boxes. Results of risk assessments, incident investigations, drills, and lessons learned are shared with relevant stakeholders for transparent and open communications.

The Cority EHS Enterprise Software platform system provides our EHS team with integrated and centralized data, standardized processes, and the ability to track, trend, and analyze EHS performance and Key Performance Indicators (KPIs). Using this information EHS can proactively mitigate risks, meet compliance requirements, identify problem areas, track and manage incidents, and monitor overall safety performance.



Seagate's Occupational Health services focus on total worker health by utilizing policies, programs and practices that integrate protection from work-related safety and health hazards with the promotion of injury and illness prevention efforts and worker well-being. The onsite Occupational Health clinics see approximately 60,000 clinic visits on average, annually. Occupational Health services include medical surveillance, emergency support, work-related case management, injury and illness visits, pre- and post-employment physicals, fitness for work assessments, and wellness program support. Worker personal health-related information is maintained confidentially by certified and licensed medical/nursing staff in the Cority-Occupational Health module. Seagate's Occupational Health also provides service to onsite contractors and visitors if they have

symptoms onsite; we also provide occupational medical examinations to an onsite contractor who works under Seagate supervision.

Contractors working at Seagate locations are required to comply with Seagate Health and Safety procedures, which utilize the hierarchy of controls in addressing health and safety risks at our locations. Those working to build Seagate products and components at supplier sites are subjected to the RBA Code of Conduct; details are provided in the supply chain section of this report.

Seagate will continue to maintain ISO 45001 Occupational Health and Safety certification. We had 67 health and safety and fire regulatory visits globally in FY2021. There were no violations or citations in FY2021.

Health and Safety: Process Chemistry

Seagate recognizes that our commitment to ensuring that workers are not exposed to hazardous chemicals does not stop at the walls of our factories and extends throughout our supply chain. The first step in this journey is understanding the chemicals used at each of the many steps in the supply chain. We have developed our Enterprise Chemical Management System (ECMS), a single, global platform for selection, ordering, tracking, use, and disposal of all chemicals used in our products/manufacturing to standardize practices, meet customer and regulatory reporting requirements, reduce costs, and support business process management across all Seagate sites.

To enable the effective transfer of chemical usage information between companies, the CEPN developed the Process Chemicals Data Collection (PCDC) Tool as

a unified industry approach to chemical data collection and reporting. Seagate is a member of CEPN and contributed materially to the development of the PCDC Tool.

Seagate will continue to use the PCDC Tool to develop an inventory of the chemicals that are used in our supply chain as well as to gather information on how those chemicals are used and what worker health and safety protections are in place. We use this information to better understand where opportunities exist in our supply chain for interventions to ensure safe conditions for workers. In FY2021, Seagate completed the process chemical documentation for all manufacturing sites, which we plan to continue annually, and also completed training materials for members of our supply chain and other electronics industry companies.



LOOKING FORWARD: BENEFITS AND WELLBEING, HEALTH AND SAFETY

In FY2022, Seagate's EHS and Occupational Health strategy will focus on evolving and expanding our EHS efforts beyond traditional occupational safety. Seagate's efforts, programs, and initiatives will continue looking at safety as it relates to infectious disease, mental health, and remote work in addition to our site operational risk. We will be placing a heavy emphasis on revising our company-wide ergonomic program, along with revising our programs and requirements for chemical management, emergency preparedness and response, and communicable disease. We will continue to focus our efforts on COVID-19 response and long-term COVID-19 resourcing and strategy, paying close attention to science, data, and our health authorities to ensure we are making informed decisions and implementing the best EHS controls for our employees.

08



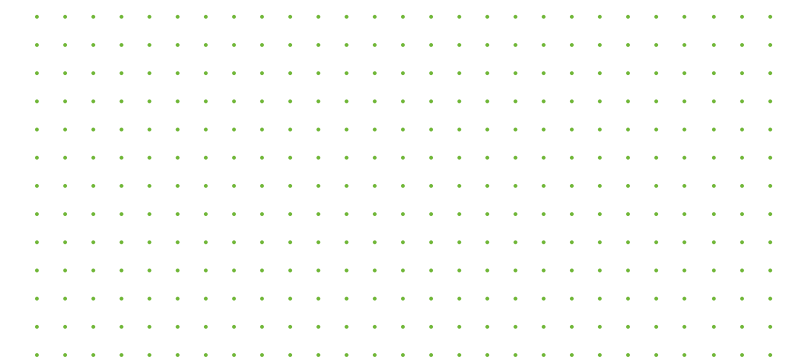
Seagate's community engagement program puts our corporate values into action in support of education and well-being. In FY2021, Seagate continued to offer community engagement opportunities at our major sites (500 or more employees), which covers 96 percent of our workforce. Our community engagement stakeholders include employees, local community members, nonprofit partners, civic and academic institutions, and governments.

Community Engagement

In FY2021, Seagate led and participated in more than 160 different engagements and partnerships around the globe. This was a decrease from previous years, as some programs were suspended due to COVID-19. In this environment, we continued our pivot begun in FY2020 to direct a large portion of our efforts and resources toward pandemic relief in local communities. Seagate nonetheless continued our long-standing tradition of delivering hands-on STEM targeted programming to K-12 students. In many cases, modified/hybrid and virtual footprints were used to deliver STEM efforts in age-appropriate ways that allowed for fun as well as learning.

With an emphasis on STEM, as well as health, wellness, and environmental opportunities, Seagate has built a community engagement program designed to provide support to the communities where we work and live.

With multiple large sites across the globe, our community engagement program reflects Seagate's vertically integrated business model. Accordingly, the program is highly localized, involving a cross-functional process to identify opportunities that are meaningful locally. We involve not only our employees, but also local community members, nonprofit partners, civic and academic institutions, and governments.



Helping the Community During COVID-19

The economy surrounding our Korat, Thailand facility is heavily dependent on agriculture, and COVID-19 constrained the local market, resulting in overproduction of crops. Seagate organized a project to help local farmers manage an oversupply of sweet corn by boosting consumption through subsidizing the purchase of corn directly from farmers. The corn was delivered to the Korat facility, and more than 10,000 employees purchased 65 tons in one week. Seagate also donated six more tons of corn to 46 schools in the area, as well as to the local Sungnoen community to promote corn as a healthy food choice.

In Northern Ireland, Seagate collaborated with Ulster University and Dell Technologies to combine research and data storage capabilities that will enable advanced analyses of COVID-19 patient data. The partnership created infrastructure enabling a petabyte of data, supporting the Ulster University research team’s efforts to examine large volumes of medical data to establish links between COVID-19, genetic make-up, and the severity of the disease. The findings will inform decisions around drug treatments for those with severe symptoms and possibly long-haul COVID-19, as well as providing insights into how genes may influence vaccination efficiency. The partnership has delivered the infrastructure to store patient information for this major research project at the Northern Ireland Centre for Stratified Medicine based at C-TRIC on the Altnagelvin hospital campus.

STEM Ongoing Support, with a Creative Shift due to COVID-19

In California, Seagate employees mentored local students through a pilot partnership with San Jose State University and Santa Clara University. Three virtual panel events were held; mentors shared their experiences and advice with students on kickstarting their careers, interviewing practices, networking, and other helpful career-related topics. Mentor-speakers also answered questions from students and made direct connections through online platforms. The new partnership was a success, with university representatives giving a resounding appreciation for Seagate’s efforts.

Seagate employees in Northern Ireland partnered on virtual volunteer opportunities with Speakers for Schools, a UK-based charity established to provide online opportunities for students 16-17 years of age. The local team developed skills in Google Classroom and created content offering insights into a career at Seagate and the potential pathways into engineering. The result was the delivery of two virtual Google Classroom experiences for students aged 15-18 years, reaching 44 schools and 98 students across NI, Manchester, London, Cardiff, and York.

Minnesota employees provided grants to six local robotics teams to support their work to provide personal protective equipment (PPE) to frontline workers as COVID-19 challenged the supply chain for safety





equipment in the state. The grants helped purchase needed materials for teams to use 3D printers to create the parts needed to make face shields. Additionally, we sponsored virtual robotics tournaments in place of in-person tournaments. Seagate also provided funding to Minnesota STEM Partnership, a nonprofit that is making STEM more accessible to students of color.

In China, Seagate sponsored two sessions of hands-on STEM learning for 100 local primary school students. Due to the pandemic, the participants were separated into two sessions on two different days. Each session lasted for four hours, including a plant tour, HDD introduction, hands-on experiment, a VR technology experience, and robotic gaming.

Continuing support of local Health and Human Services organizations

In Colorado, employees continued their ongoing support of local food banks and social service organizations. Volunteers created care packages for homeless veterans and donated school supplies for children in need.

Seagate volunteers in China picked up paint brushes to help a local community improve living conditions for 150 local senior citizens. Volunteers painted the house walls with beautiful pictures and fences with bright colors.

Our Singapore research and development site collected book vouchers for children from the Singapore Children's Society (SCS) during the Christmas festive season, to help them with their back-to-school needs. Seagate also made a financial donation to support the programs for the children at SCS. Some of these programs include casework and counseling, financial aid, workshops and camps, as well as information and referral services.

In Johor, Malaysia, we collaborated with the Universiti Teknologi Malaysia, a local university that is teaching families to use historical data to improve the yields of farming vegetables with the goal of enabling families to grow their own vegetables for consumption. The farmers who have successful crops sold the extra vegetables within their community to help support their families. This project helped families in need in Johor, especially those affected by the pandemic.

LOOKING FORWARD: COMMUNITY ENGAGEMENT

In FY2022, Seagate will focus on volunteer opportunities to encourage employee engagement and foster positive awareness of Seagate in the communities where we work and live. We know communities are still suffering from the long-term effects of COVID-19. We will continue to pivot our programs to address the changing needs and challenges facing our communities. Our plan is to increase educational outreach and programs that focus on how our technologies, products, and the larger datasphere can benefit the next generation.

Supply Chain

Seagate is a global company with diverse operations; agility is key in meeting customer and market demands. Our supply chain is an extension of our footprint, and stakeholders hold us responsible for the performance and actions of our suppliers. This makes supply chain diligence important to Seagate.

Through education, strategic management, and transparency to and from our manufacturers, and suppliers, Seagate seeks to ensure that people in our supply chain are treated fairly, and resources managed responsibly.

Seagate has two categories of suppliers; direct (those that provide components and parts of our products), and indirect (those that provide products and services that support our operations). Our supply chain responsibility program has four aspects: Code, Capacity Building, Risk Assessment, and Remedy. The objective of the program is to ensure our supply chain acts responsibly and implements remediation when issues are identified. Seagate's Supply Chain organization has full-time staff and dedicated resources to implement and monitor supply chain compliance. The management system's effectiveness is evaluated through various channels including management reviews, internal and external audits, and performance against targets. We believe the management system is functioning effectively, and minor adjustments are made as and when needed.

The RBA Code of Conduct also serves as the code of conduct for our suppliers, and we expect that 100 percent of suppliers will comply. We expect our suppliers to pass the RBA Code of Conduct to their suppliers and hold them to the same standards that we hold them to.

Our supply chain responsibility program aligns with the RBA tools and processes provided. We align with the RBA because we believe an industry wide standard is the most efficient way to set expectations and carry out verification throughout the supply chain.

The RBA Closure Audit is the preferred option for verifying successful closures of audit findings; Seagate's requirements are documented in our CSOP and communicated to our supply chain partners. Supplier audit performance and closure findings are scored in the Quarterly Supplier Scorecard for the affected supplier(s).

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Supplier Engagement and Collaboration

Seagate regularly meets with suppliers to share expectations and evaluate our level of engagement, this proactive approach with suppliers helps to ensure our goals and standards are aligned.

We require onsite service providers, such as canteen and janitorial services, to adhere to Seagate's Standard Operating Procedures to ensure that all onsite service providers are held to the same standards as our own workforce. Seagate does not currently use foreign labor via agents, and we partner with recruitment agents at various locations, including Thailand, China, Singapore, and the United States, who provide local talent.

Our Supply Chain organization has fulltime staff and dedicated resources to monitor RBA compliance and education and ensure adherence to applicable global and local laws.

Seagate conducts multiple Executive Business Reviews to ensure success within our supply chain. These reviews include supplier RBA compliance efforts with supplier leadership. Through collaboration with our suppliers on key projects that focus on issues like RBA Code of Conduct conformance, financial sustainability, and process improvement we are able to innovate and scale for everyone's benefit.

In FY2021, Seagate partnered with third-party providers to deliver supplier training via six webinar sessions with nearly 600 supplier participants. These webinars included topics on responsible sourcing of minerals, RBA Code Version 7.0, emergency preparedness, forced labor. The webinars were designed to include implementation of the RBA Code of Conduct, and how to develop effective corrective action plans for actual audit findings in these topic areas. We also held a session on COVID-19 response to ensure suppliers were managing their operations in

line with RBA Code expectations during the pandemic. We held no face-to-face sessions as COVID-19 restrictions impacted our annual training plans.

Our Anti-Slavery and Human Trafficking statements are posted on our [website](#) in adherence to the California Transparency in Supply Chain Act and United Kingdom Modern Slavery Act to demonstrate our efforts as a company in preventing slavery and human trafficking in our business and supply chain.

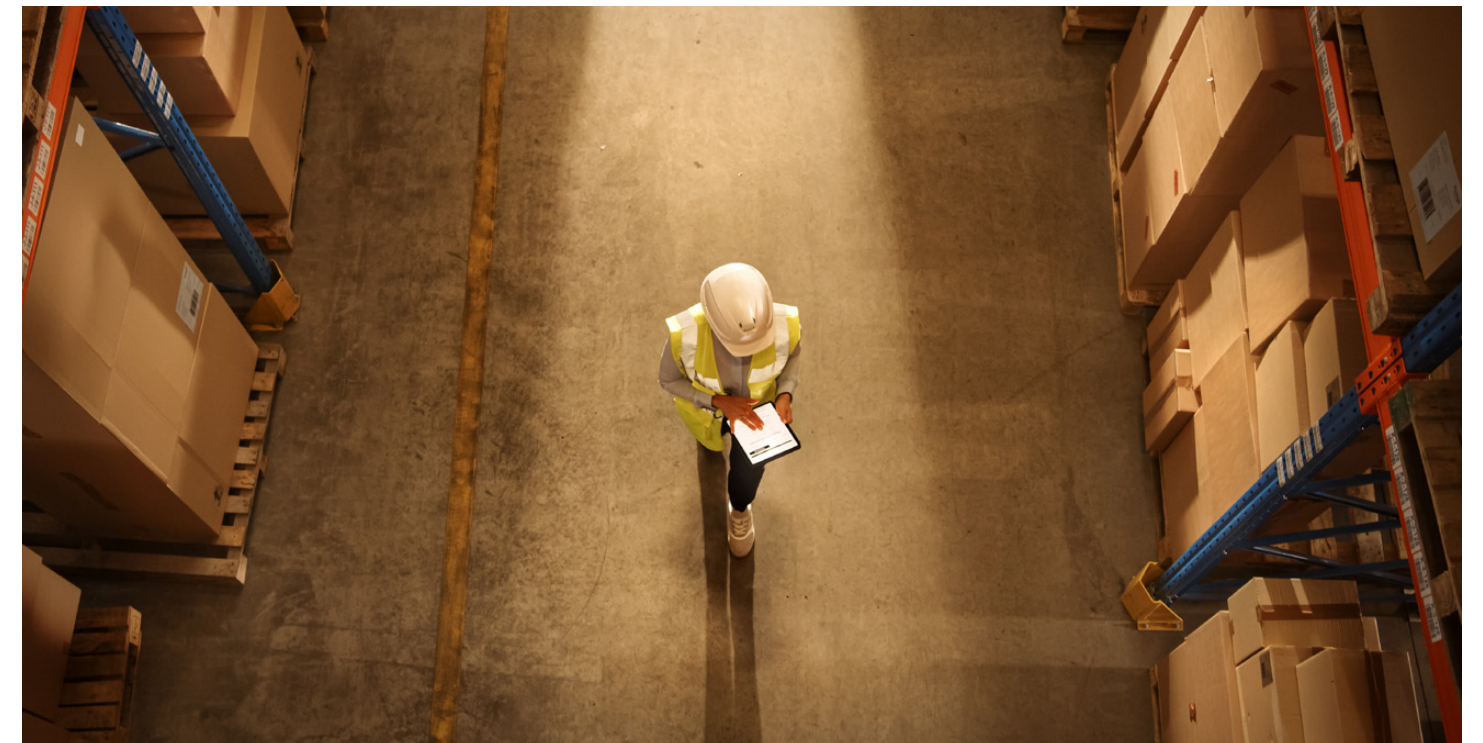
Seagate has an active presence in the RBA. Our involvement helps us be a better global citizen and also provides the opportunity to work with peers to drive improvements in the global supply chain. We are proud to have a continued major role in the RBA, with our Senior Vice President, Business Sustainability and Transformation serving as Board Chair in FY2021, and serving in the Executive Committee and as Board Chair in FY2021.

Through our audits in FY2021, cases of high recruitment fees by our suppliers involving foreign migrant workers in Malaysia and Thailand were identified. During the year, we worked with the RBA and other customers of these suppliers to confirm the allegations and quantify the amount of fees involved. Identification of recruitment fees, especially in a worker's home country, has been extremely challenging, but is very important in protecting workers in our supply chain, and maintaining integrity as a company. We continue to work closely with the RBA and other customers to address this issue. In FY2021, approximately \$1.2M was reimbursed by those suppliers to over 2,000 workers. Six suppliers completed their remediation actions and we are continuing to track the remediation of two other suppliers. We will maintain our engagement with our suppliers to ensure ethical recruitment practices are adhered to while hiring workers.

Supply Chain Due Diligence

Seagate's supplier due diligence process considers a number of factors (such as type of supplier, spend, onsite or offsite) in determining suppliers who fall within the scope of our RBA programs. Seagate uses the Self-Assessment Questionnaire (SAQ) and Validated Audit Program (VAP) as our primary risk assessment tools. The SAQ assesses risk in these four areas: social

impacts, health and safety, environment and ethics. With these tools we are able to determine any instances of non-conformance with the RBA Code of Conduct and obtain root cause and corrective action plans as needed. Training on the RBA Code of Conduct and our expectations is given either directly to suppliers, or through tools provided by the RBA.



Seagate's existing suppliers, and 100 percent of new suppliers identified in the scope of our policy, are screened annually. The SAQ assesses supplier compliance with code requirements. Seagate's expectation is for our suppliers to conform to the latest version of the RBA code of conduct, utilize only certified 3TG smelters and respond to the RBA Environmental survey. In FY2021, 169 suppliers either completed or updated their SAQ and released it via the RBA-Online system.

Seagate requires all of our direct materials suppliers with whom we spend at least \$1 million annually, as well as selected indirect suppliers, to undergo the RBA VAP audit process. Doing so helps to ensure integrity and verify conformance with the RBA Code of Conduct. These audit reports are valid for two years, meaning our suppliers are on a two-year audit cycle.

108
direct and packaging suppliers
 completed the RBA environmental survey

71 percent have GHG reduction targets, 74 percent have water reduction goals

169
targeted suppliers (direct and indirect)
 completed the SAQ

71
full supplier audits completed¹
 during FY2021 through the RBA VAP

44 were completed in FY2020, for a total of 115 active supplier audits

Platinum Level Recognition
12.67%
of audited suppliers
 received a full score in the initial VAP Audit

30%
of audited suppliers
 received a full score in the closure VAP Audit

20
supplier closure audits conducted²
 to ensure suppliers previously found non-compliant have implemented correction measures on any violations found in the initial VAP audit

75.09%
Closure rate
 of nonworking-hour findings

62.63%
Closure rate³
 of working-hour findings

¹ 12 audits postponed due to COVID-19.

² When suppliers are unable to close any findings, we work to reduce the level of severity, and then track closure rates.

³ Seagate tracks “priority” and “major” finding closure rates in addition to SAQ and VAP completion.

SASB TC-HW 430	Quantitative	Percentage / Rate
Percentage of Tier 1 supplier facilities audited in the RBA Validated Audit Process (VAP) or equivalent, by (a) all facilities and (b) high-risk facilities	a) FY2021 64/76 *12 audits postponed due to COVID b) N/A (No high-risk facilities)	a) 84% b) N/A (No high-risk facilities)
Tier 1 suppliers' (1) non-conformance rate with the RBA Validated Audit Process (VAP) or equivalent, and (2) associated corrective action rate for (a) priority non-conformances and (b) other non-conformances	1) Priority non-conformance = 22 Other non-conformance= 389 (Total audits = 64)	a) Priority non-conformance = 0.34 findings per audit b) Other non-conformance = 6 findings per audit Priority non-conformance corrective action rate = (22-12)/22 (45%) Other non-conformance corrective action rate = (389-52)/389 (86%)

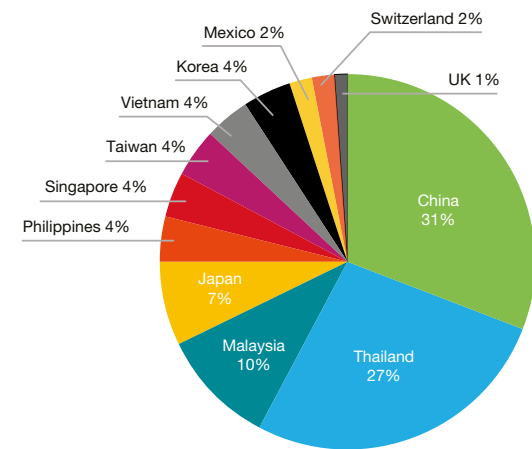
Seagate also conducted environmental compliance screenings of 41 Chinese supplier sites via the Institute of Public and Environmental Affairs (IPE) database. Two of these 41 suppliers (<5%) were found on the database for issues pertaining to effluent/wastewater quality. We are working with the two suppliers to address the non-compliance.

Seagate tracks “priority” and “major” finding closure rates in addition to SAQ and VAP completion. At the end of FY2021, the closure rate of nonworking-hour findings was 75 percent; the closure rate of working-hour findings was 63 percent.

Top 10 Supplier VAP Audit Findings

1 Working Hours	2 Emergency Preparedness	3 Supplier Responsibility	4 Freely Chosen Employment	5 Occupational Safety
6 Sanitation, Food, and Housing	7 Hazardous Substances	8 Wages and Benefits	9 Occupational Injury and Illness	10 Legal and Customer Requirements

FY2021 Supplier Audits by Country



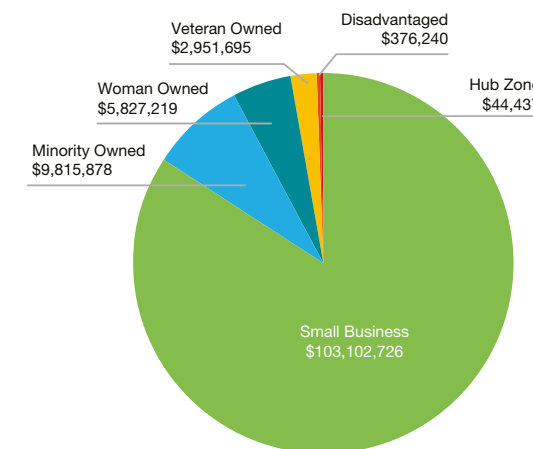
We remain vigilant about child labor, forced labor, and threats to freedom of association within our supply chain. The highest risk of forced labor in our supply chain is where foreign labor is utilized; suppliers in China, Thailand, and Malaysia pose the highest risk. Our training on forced labor has been focused on suppliers in these countries over the past four years. Based on supplier VAP audits, child labor and young workers exposed to hazardous work have not been identified as a serious concern in our supply chain. However, various Non-Governmental Organizations (NGOs) report that student workers in the China supply chain represent an area of possible concern for the region.

Our audit results have not identified any geographies of concern for freedom of association and collective bargaining in FY2021. Most of the findings in this area are related to suppliers not having a policy/procedure on the right of peaceful assembly.

Supplier Diversity

Our global customer base, local communities, employees, and suppliers make up a diverse network that spans the globe. To encourage diversity in our supplier base, Seagate regularly contracts with diverse suppliers who qualify and successfully compete for our business; there is great value in minority-owned businesses. For example, diverse suppliers in the United States are welcome to participate in Seagate’s competitive bidding process, including businesses owned and operated by minorities and those located in historically underutilized business zones. We are proud to play a part in helping diverse suppliers grow, create jobs, and strengthen the communities in which they live and do business.

Supplier Diversity Spend FY2021 (United States only) \$122M



LOOKING FORWARD: SUPPLY CHAIN

In FY2022, Seagate will continue to focus on working with our suppliers to minimize risk of forced labor. We will also begin to engage with key suppliers to better understand their carbon footprint in order to identify opportunities for emissions reduction. Seagate will continue to confirm, including through the use of questionnaires and audits, suppliers’ compliance with the RBA Code of Conduct, responsible sourcing of materials, and adherence to any laws in the countries they conduct business in. We will also continue to advocate that this should be done within each of our suppliers’ own supply chain.

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Business Continuity

Individuals and companies alike face the complexity and unpredictability of the world each day—and Seagate is no different in facing the innumerable risks and threats to our business. We are committed to investing and protecting our operations and supporting the community from any foreseeable threats by aligning our business continuity practices with the ISO 22301 standard. The Seagate Business Continuity Policy captures this commitment.

Such business challenges should not be disruptive to our customers and stakeholders. Accordingly, Seagate continued to mature our Business Continuity Management System (BCMS) throughout FY2021 to manage and mitigate the various known risks and threats to our business. Our BCMS encompasses four pillars of planning—Business Continuity Planning, Incident Management, Crisis Management, and Supply Chain Risk Management with Enterprise Risk Management Program oversight—and complies with the ISO 22301 Management System.

In FY2021, Seagate transitioned our business continuity planning practices from those required in the initial release of the 2012 standard to the requirements in the second edition, ISO 22301:2019. To ensure compliance with the 2019 standard requirements and to enable continuous

improvement, we continued to utilize a Business Continuity Performance Scorecard for both our HDD and component sites, as well as design centers across the enterprise, and expanded our products scope to include our Systems products. Our HDD manufacturing sites in China and Thailand were audited in CY2020 and maintained their ISO 22301:2012 certifications.

In addition, in FY2021 our supply chain risk management program continued to proactively monitor supplier risk by enabling global event alerting and completing assessments of our critical suppliers. Our enterprise business continuity software remains our central repository for all business continuity documents and assessments, with both systems continuing to align with our document management practices and the requirements of ISO 22301:2019.



CASE STUDY

Enabling Effective Supply Chain Risk Management Through Technology

The challenges many organizations experience today in the global supply chain are unprecedented. The dynamic situation that COVID-19 has and continues to present, as well as challenges to those unrelated to COVID-19 contribute to the supply chain disruptions we see today.

At Seagate, our solution to effectively manage supply chain risk and potential supply chain disruptions is two-fold: 1) identify and assess suppliers and their capabilities, then 2) proactively mitigate and monitor any risk associated to our partner network. This approach is aided and enhanced by using carefully selected technology and tools that allow the organization to support transparent, trusting partnerships through an accessible, collaborative platform. This has given

Seagate the ability to address key business risks, execute short and long-term solutions, and achieve end-to-end visibility, enabling a secure, robust global supply chain base and supply chain risk management program.

Utilizing Technology to Enable Trusting Supply Chain Partnerships

In FY2020, Seagate undertook a large effort to assess Seagate’s suppliers’ business continuity capabilities. We took this first step, utilizing a collaborative approach in a single digital supply chain management environment that has allowed us to stay connected to our partners and manage potentially impactful events as they arise and proactively mitigate before they occur. During FY2021, Seagate continued to mature our supply chain management strategies by improving our business

processes that directly affect the way we manage the risks from our suppliers’ business continuity capabilities in our supply chain technology environment.

Increasing Visibility into Our Supply Chain

Assessing our suppliers’ business continuity capabilities is the first prong in our two-pronged approach. In FY2021, we expanded our efforts to gain insight into our diverse supply chain utilizing our Supply Chain Risk Management software, which has allowed Seagate to manage the complexity of our global supply chain by increasing visibility into our extended supply chain ecosystem, enabling the management of risk associated with our supplier network.

Managing Vulnerabilities and Mitigating Risk Within Our Supply Chain

Increasing the visibility into our supply chain using a reliable platform has been a critical step in securing a trusted space between Seagate and suppliers. It has created real-time transparency to effectively manage the risks related to the complexity and potential vulnerabilities within our supply chain base. As a result, Seagate has been able to identify, analyze, and assess the data collected from the Supply Chain Risk Management platform to drive consistency and enable effective decision-making to mitigate risk and make key business decisions.



LOOKING FORWARD: BUSINESS CONTINUITY MANAGEMENT SYSTEM

In FY2022, Seagate will continue to extend and exercise our Business Continuity Management System using the requirements set forth by ISO 22301:2019, recertifying our HDD sites in China and Thailand to ISO 22301:2019 and continuing to mitigate any potential COVID-19 impacts to ensure an effective business continuity response. Additionally, by applying our COVID-19 learnings, we will extend our Seagate BCMS through an expanded business continuity planning scope including risk mitigation and targeted action improvements related to climate change. Build out of our mitigation database will continue to allow for effective management of supplier-related risk mitigation plans. Our supply chain mapping efforts will continue to expand as well, including surveying our Tier 2 suppliers (our suppliers’ suppliers).

	PERFORMANCE INDICATOR	FY2019	FY2020	FY2021
Electricity Use and Carbon Emissions	Electricity Consumption (Million MWh)	1.574	1.625	1.639
	Electricity Consumption per Storage Capacity Shipped (MWh/EB)	4.533	3.674	3.061
	Scope 1 and Location-Based Scope 2 GHG Emissions (Million Metric Tons CO2e) ¹	*1.155	1.150	1.190
	Scope 1 and Market-based Scope 2 GHG Emissions (Million Metric Tons CO2e) ¹	1.158	1.156	1.199
	Scope 1 and Location-Based Scope 2 GHG Emissions per Storage Capacity Shipped (Metric Tons CO2e/EB) ¹	3.159	3.156	2.494
	Scope 3 GHG Emissions (Million Metric Tons CO2e) ^{1,2}	9.117	7.859	8.670
Water Usage	Water Withdrawal (Megaliters) ¹	*8.316	8.029	7.529
	Water Recycled (Percentage) ¹	31%	35%	40%
	Water Intensity (Megaliters/EB of storage capacity shipped) ¹	*22.68	*21.91	15.66
Pollution Prevention	Hazardous Waste Generated (Metric Tons)	8.445	9.455	9.481
	Non-Hazardous Waste Diverted (Percentage)	87%	*88%	87%
Health and Safety	Injury and Illness Recordable Case Rate (Cases/100 employees)	0.19	0.18	0.23
	Injury and Illness Days-Away Case Rate (Cases/100 employees)	0.11	0.10	0.12
Ethics	Code of Conduct Certification (Percentage) ³	Delayed due to program revision	98.5%	99.2%
	Conflict of Interest Policy Certification (Percentage)	Delayed due to program revision	98%	99%
Our Employees	Non-operator Employees Completing Annual Performance Evaluation Process	99%	99%	99%
	Non-operator Employees With Performance Goals	99%	99%	99%
	Non-operator Employees With Learning Plans	97%	97%	99%

¹ Total annual carbon emissions, carbon emissions per storage capacity shipped, and water metrics are measured and reported based on the calendar year. The values provided in this table are for calendar years 2018, 2019, and 2020. Other numbers in the table, for ethics, health and safety, and our employees are all reported in FY.

² All 15 Scope 3 categories were assessed, and 12 of 15 were found relevant.

³ Percentage of non-operator employees who acknowledged the Code of Conduct through the annual training and attestation process. In FY2020, Code of Conduct and Conflict of Interest Policy Certification (Percentage) were broken out into two separate processes, where in previous years they were a singular process.

* Adjustment over past years results with better data availability and improved methodologies

Policies

Environment, Health, Safety, and Sustainability

Energy

Human Rights

Responsible Sourcing of Minerals

Seagate Business Continuity Policy

Code of Conduct

Stakeholder Engagement

Seagate relies on key external stakeholders' input to help inform our decisions regarding certain environmental, social, and governance issues. We identify and select stakeholders through a mapping exercise that indicates the level of engagement appropriate for each stakeholder. Criteria for selection include past engagement with Seagate, collaboration with industry associations such as the RBA, and publishers of industry reports. Below are three examples of stakeholder engagement.

Global Citizenship

Each year, we solicit feedback from customers and business partners to help shape our Global Citizenship program. We openly share detailed information about our environmental performance and greenhouse gas emissions to help the electronics industry reduce its environmental impact. Inputs from stakeholders help ensure we have a best-in-class program.

Quality

We solicit feedback on our performance, reliability, and product quality through Net Promoter Score surveys and Customer Scorecards. These reports are produced quarterly and are shared with internal teams to both celebrate successes and focus on areas for improvement.

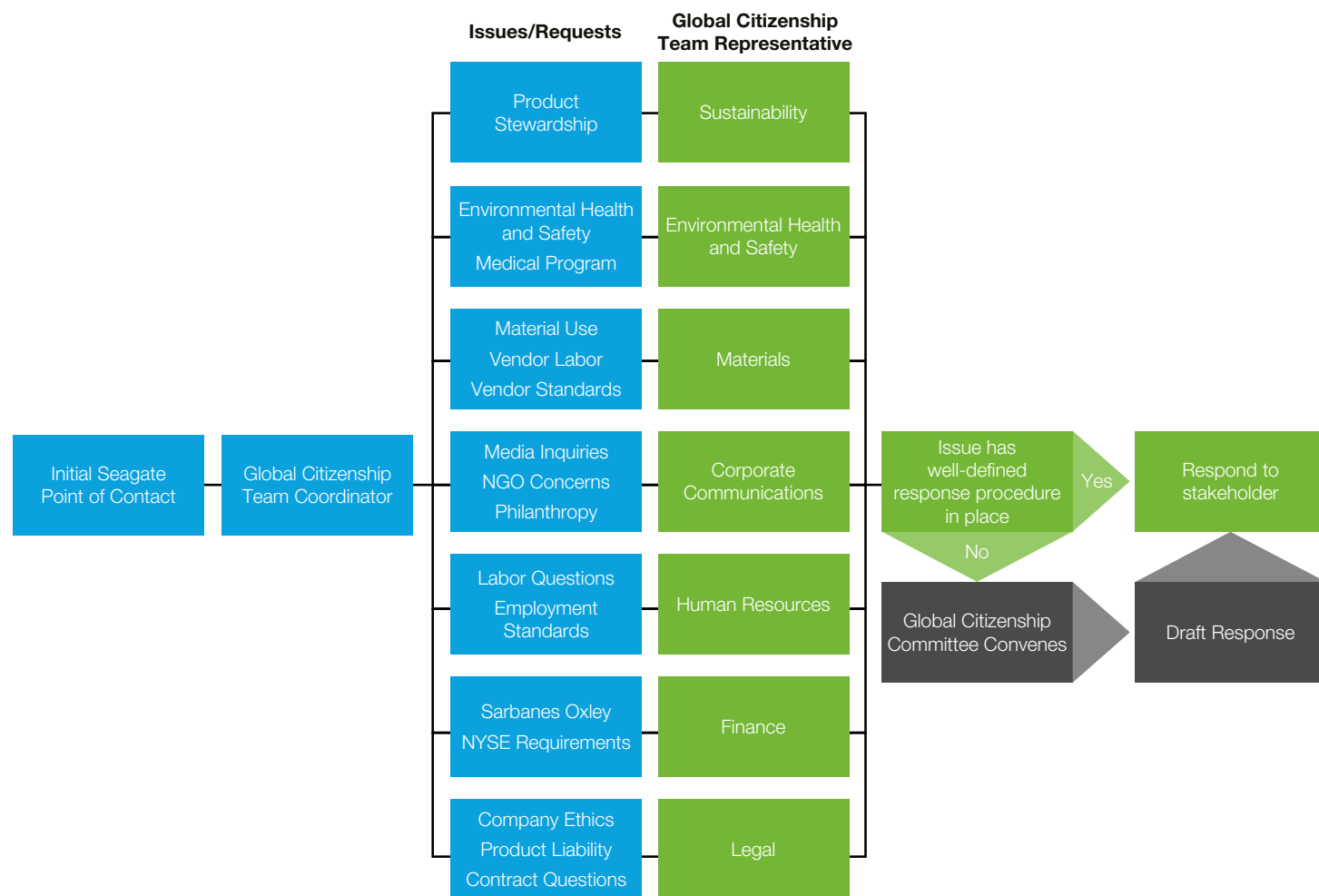
Business and Social Trends

Each year, Seagate meets with investors, governments, NGOs, local communities, and other stakeholder members to gather perspectives that could affect our success as a business and as a sustainable company. Employees at Seagate also provide input through a variety of forums, surveys, and meetings. In addition, Seagate holds a yearly Supplier Day and offers webinars, training, and more. Please see the sections on Supply Chain and Product Sustainability for more information.

In FY2020, Seagate conducted a formal Materiality Assessment with both internal and external stakeholders. The assessment identified key sustainability topics. We review our sustainability framework annually. After our review in FY2021, we concluded that the assessment from FY2020 remained valid.

Global Citizenship Stakeholder Inquiry Process

Seagate has an established process to address specific stakeholder global citizenship issues or requests. A cross-functional effort is responsible for this process. The types of information provided range from environmental performance, product stewardship, and product safety to labor standards, fair trade, supply chain, and more.



ESG DESIGNATION	MATERIAL TOPICS	SUB-TOPICS
Environmental	Climate and Energy	<ul style="list-style-type: none"> Product energy use Operational GHG emissions, efficiency, renewable energy Climate adaptation and resiliency
	Material Use and Circularity	<ul style="list-style-type: none"> Hazardous and e-waste management Use of rare earth metals Reducing solid waste and landfill diversion Circular product design Product takeback and reuse or recovery of materials and components at end of life
	Water Stewardship	<ul style="list-style-type: none"> Water use Wastewater discharges
	Chemicals and Restricted Substances	<ul style="list-style-type: none"> Compliance with chemicals regulations Systems to select safer alternatives Process chemistry Incident prevention
Social	Human Rights and Working Conditions	<ul style="list-style-type: none"> Supply chain standards and audits Forced and child labor Occupational Health & Safety Conflict minerals Fair wages, benefits, and working hours Freedom of association Use of temporary / foreign workers
	Diversity and Inclusion	<ul style="list-style-type: none"> Diversity of governance bodies and employees Inclusive culture Women and minority development and promotion
	Employee Development, Engagement and Retention	<ul style="list-style-type: none"> Employee attraction, engagement, retention Training, development, internal promotion Employee wellness Skills and future work
	Local Community Education and Access to Technology	<ul style="list-style-type: none"> Local community engagement STEM education Digital literacy Access to technology
Governance	Data Privacy and Security	<ul style="list-style-type: none"> Hard drive security for customers Cyber security Data privacy and sovereignty
	Business Ethics	<ul style="list-style-type: none"> Corporate governance Bribery, anti-corruption, anti-competition Intellectual property Third parties and grievance mechanisms

UNGC Content Index

Seagate has been an active participant in the United Nations Global Compact (UNGC) since 2004, and we have aligned our management systems to the 10 universally-accepted principles in the areas of human rights, labor, environment, and anti-corruption. These principles guide us as we develop new programs and strategies in the area of global citizenship. We are committed to the implementation, disclosure, and promotion of the UNGC's Principles throughout our operations. The table below provides a guide to our strategies and actions in support of the 10 principles.

UNGC PRINCIPLE	THE BUSINESS SHOULD SUPPORT AND/OR UPHOLD THE FOLLOWING	SUSTAINABILITY DEVELOPMENT GOAL	PAGES
1	Support and respect the protection of internationally proclaimed human rights.	SDG 17: Partnerships for the goals	Pages 82-119, 126-133, 139
2	Make sure that they are not complicit in human rights abuses.		
3	The freedom of association and the effective recognition of the right to collective bargaining.	SDG 5: Gender equality SDG 8: Decent work and economic growth	Pages 82-119, 126-133, 139
4	The elimination of all forms of forced and compulsory labor.		
5	The effective abolition of child labor.		
6	The elimination of discrimination in respect of employment and occupation.		
7	Support a precautionary approach to environmental challenges.	SDG 6: Clean water and sanitation	Pages 34-81, 126-133, 139
8	Undertake initiatives to promote greater environmental responsibility.	SDG 7: Affordable and Clean Energy	
9	Encourage the development and diffusion of environmentally friendly technologies.	SDG 12: Responsible consumption and production SDG 13: Climate action	
10	Work against corruption in all its forms, including extortion and bribery.	SDG 17: Partnership	Pages 26-33, 126-133, 139

GRI Content Index

This report has been prepared in accordance with the GRI Standards: Core option to promote a more consistent, standardized approach to its sustainability reporting.

Sustainable Datasphere, Seagate's FY2021 global citizenship report, references the GRI Standards listed in the left-hand column of this GRI Content Index. Where the GRI Standard has not been used in full, we have marked the disclosure "partial" and where needed explained reasons for omission. For more information

about the GRI and its Reporting Standards visit www.globalreporting.org.

While Seagate has not received external assurance for the data within this report, we have engaged third parties to help determine the report content (including application of the Materiality principle and the stakeholder engagement process) and ensure that the report has been prepared in accordance with the GRI Standards: Core option.

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 102: General Disclosures 2016	102-1 Name of the organization	Page 18	Full	
	102-2 Activities, brands, products, and services	Page 23	Full	
	102-3 Location of headquarters	Page 24	Full	
	102-4 Location of operations	Page 24-25	Full	
	102-5 Ownership and legal form	Form 10-K	Full	
	102-6 Markets served	Page 23	Full	
	102-7 Scale of the organization	Page 24-25, 83	Full	
	102-8 Information on employees and other workers	Page 84	Full	
	102-9 Supply chain	Page 126-133	Full	
	102-10 Significant changes to the organization and its supply chain	Page 18	Full	
	102-11 Precautionary Principle or approach	Throughout Report	Full	"Our precautionary approach is reflected in our Environment, Health, Safety, and Sustainability Policy."

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 102: General Disclosures 2016	102-12 External initiatives	Pages 5, 151	Full	
	102-13 Membership of associations	Page 33	Full	
	102-14 Statement from senior decision-maker	Pages 4-5	Full	
	102-16 Values, principles, standards, and norms of behavior	Pages 4-5, Governance and Ethics Section	Full	
	102-17 Mechanisms for advice and concerns about ethics	Page 32	Full	
	102-18 Governance structure	Page 21, Form 10-K, Investors Page	Full	
	102-22 Composition of the highest governance body and its committees	Governance Site	Full	
	102-23 Chair of the highest governance body	Governance Site	Full	
	102-24 Nominating and selecting the highest governance body	Governance Site	Full	
	102-25 Conflicts of interest	Governance Site	Full	
	102-40 List of stakeholder groups	Throughout Report	Full	
	102-41 Collective bargaining agreements	Page 91	Full	
	102-42 Identifying and selecting stakeholders	Pages 139-140	Full	
	102-43 Approach to stakeholder engagement	Pages 20, 139-140	Full	
	102-44 Key topics and concerns raised	Throughout Report	Full	
	102-45 Entities included in the consolidated financial statements	Form 10-K	Full	
102-46 Defining report content and topic Boundaries	Page 20	Full		

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 102: General Disclosures 2016	102-47 List of material topics	Pages 20, 141	Full	
	102-48 Restatements of information	Pages 20-21	Full	
	102-49 Changes in reporting	Pages 18-21	Full	
	102-50 Reporting period	Page 18	Full	
	102-51 Date of most recent report	Page 18	Full	
	102-52 Reporting cycle	Pages 18-21	Full	
	102-53 Contact point for questions regarding the report	Page 3	Full	
	102-54 Claims of reporting in accordance with the GRI Standards	Page 20	Full	
	102-55 GRI content index	Page 143	Full	
	102-56 External assurance	N/A	Full	While Seagate has not received external assurance for the data within this report, we have engaged third parties to help determine the report content (including application of the Materiality principle and the stakeholder engagement process) and ensure that the report has been prepared in accordance with the GRI Standards: Core Option, as well as SASB standards.

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Throughout Report	Full	
	103-2 The management approach and its components	Throughout Report	Full	
	103-3 Evaluation of the management approach	Throughout Report	Full	
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	CDP Disclosure, Pages 56-69	Full	
	201-3 Defined benefit plan obligations and other retirement plans	Form 10-K	Full	
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risk related to corruption	Page 28	Full	
GRI 301: Materials 2016	301-1 Materials used by weight or volume	LCA's, Pages 38, 40	Partial	Data not currently available for disclosure.
	301-2 Recycled input materials used	N/A		Information not currently tracked. Seagate plans to benchmark and try to better understand recycled materials used in our products.
	301-3 Reclaimed products and their packaging materials	Pages 40-41	Partial	Data not currently available for disclosure.
GRI 302: Energy 2016	302-1 Energy consumption within the organization	CDP Disclosure, Energy section, Pages 56-69	Full	
	302-3 Energy intensity	Pages 58-59	Full	
	302-4 Reduction of energy consumption	Page 61	Full	

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	CDP Disclosure, Pages 74-75	Full	
	303-2 Management of water discharge related impacts	Pages 76-77	Full	
	303-3 Water withdrawal	Pages 74-75	Full	
	303-4 Water discharge	Pages 77-79	Full	
	303-5 Water consumption	Page 76	Full	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to protected areas and areas of high biodiversity value outside protected areas	Page 55	Full	
	304-3 Habitats protected or restored	Page 55	Full	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Pages 62-63, 67	Full	
	305-2 Energy indirect (Scope 2) GHG emissions	Pages 62-63, 65-66	Full	
	305-3 Other indirect (Scope 3) GHG emissions	Pages 63, 67-68	Full	
	305-4 GHG emission intensity	Pages 64-65	Full	
	305-5 Reduction of GHG emissions	Pages 61, 63, 65	Full	
	305-6 Emissions of ozone-depleting substances (ODS)	Page 69	Full	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Page 68	Full	

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Page 70	Full	
	306-2 Management of significant waste-related impacts	Page 70	Full	
	306-3 Waste generated	Pages 70-72	Full	
	306-4 Waste diverted from disposal	Pages 71-73	Full	
	306-5 Waste directed to disposal	Pages 71-73	Full	
GRI 307: Environmental 2016	307-1 Noncompliance with environmental laws and regulations	Pages 48, 56	Full	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Pages 126-133	Full	
	308-2 Negative environmental impacts in the supply chain and actions taken	Page 131	Full	
GRI 401: Employment 2016 (Containing Standard Interpretation 1)	401-1 New employee hires and employee turnover	Page 98	Full	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Page 110	Full	
	401-3 Parental Leave	Page 110	Partial	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 114	Full	
	403-2 Hazard identification, risk assessment, and incident investigation	Pages 117-118	Full	
	403-3 Occupational Health services	Page 118	Full	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Page 117	Full	

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 403: Occupational Health and Safety 2018	403-5 Worker training on occupational health and safety	Page 115	Full	
	403-6 Promotion of worker health	Pages 110-112	Full	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Pages 38, 117	Full	
	403-9 Work-related injuries	Pages 115, 117	Full	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Page 107	Full	
	404-2 Programs for upgrading employee skills and transition assistance programs	Pages 98, 107	Full	
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 106	Partial	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 104	Full	
	405-2 Ratio of basic salary and remuneration of women to men	Page 103	Partial	
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Pages 90-91, 132	Full	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Pages 90-91, 132	Full	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Pages 90-91, 132	Full	

GRI STANDARD	GRI DISCLOSURE	LOCATION	LEVEL OF DISCLOSURE	REASON FOR OMISSION AND OTHER NOTES
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Page 92	Full	
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	Page 92	Full	
	412-2 Employee training on human rights policies or procedures	Page 92	Partial	
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Pages 120-125	Partial	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Page 129	Full	
	414-2 Negative social impacts in the supply chain and actions taken	Pages 128-132	Partial	
GRI 415: Public Policy 2016	415-1 Political contributions	Pages 32-33	Full	
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Page 38	Full	
	416-2 Incidents of noncompliance concerning the health and safety impacts of products and services	Page 35	Full	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	N/A		Seagate tracks data related to this indicator, but does not disclose details due to the nature of the subject to protect our customers.
GRI 419: Socioeconomic Compliance 2016	419-1 Noncompliance with laws and regulations in the social and economic area	Form 10-K	Full	

Seagate subscribes to or endorses the following economic, environmental and social charters, principles or other initiatives:

1. Business Coalition for the Equality Act
2. Carbon Disclosure Project
3. Global Reporting Initiative
4. International Labor Organization
5. International Organization for Standardization (ISO)
6. Responsible Business Alliance
7. Responsible Minerals Initiative
8. Responsible Labor Initiative
9. Securities and Exchange Commission
10. United Nations Global Compact
11. Science Based Targets

SASB Table with Accounting and Activity Metrics

TOPIC	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	PAGE
Product Security	Description of approach to identifying and addressing data security risks in products	Discussion and Analysis	N/A	TC-HW-230a.1	Pages 30-31
Employee Diversity and Inclusion	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees ²	Quantitative	Percentage (%)	TC-HW-330a.1	Page 104
Product Lifecycle Management	Percentage of products by revenue that contain IEC 62474 declarable substances ³	Quantitative	Percentage (%)	TC-HW-410a.1	Pages 39, 44
	Percentage of eligible products, by revenue, meeting the requirements for EPEAT registration or equivalent ⁴	Quantitative	Percentage (%)	TC-HW-410a.2	Page 39
	Percentage of eligible products, by revenue, meeting ENERGY STAR [®] criteria	Quantitative	Percentage (%)	TC-HW-410a.3	Page 39
	Weight of end-of-life products and e-waste recovered, percentage recycled	Quantitative	Metric tons (t), Percentage (%)	TC-HW-410a.4	Page 39

² The entity shall discuss its policies and programs for fostering equitable employee representation across its global operations.
³ Disclosure shall include a discussion of the approach to managing the use of IEC 62474 declarable substances.
⁴ Disclosure shall include a discussion of efforts to incorporate environmentally focused principles into product design.

TOPIC	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	PAGE
Supply Chain Management	Percentage of Tier 1 supplier facilities audited in the RBA Validated Audit Process (VAP) or equivalent, by (a) all facilities and (b) high-risk facilities	Quantitative	Percentage (%)	TC-HW-430a.1	Page 131
	Tier 1 suppliers' (1) non-conformance rate with the RBA Validated Audit Process (VAP) or equivalent, and (2) associated corrective action rate for (a) priority non-conformances and (b) other non-conformances	Quantitative	Rate	TC-HW-430a.2	Page 131
Materials Sourcing	Description of the management of risks associated with the use of critical materials	Discussion and Analysis	N/A	TC-HW-440a.1	Pages 52-53

TOPIC	ACTIVITY METRIC	CATEGORY	UNIT OF MEASURE	CODE	
	Number of units produced by product category	Quantitative	Number	TC-HW-000.A ⁵	Form 10-K
	Area of manufacturing facilities	Quantitative	Square Feet	TC-HW-000.B	Form 10-K
	Percentage of production from owned facilities	Quantitative	Percentage (%)	TC-HW-000.C	Form 10-K

⁵The entity shall indicate the number of units produced during the reporting period whether they were manufactured in its own facilities or they were produced by contract manufacturers or suppliers. Disclosure shall be according to the following product categories: Communications Equipment, Components, Computer Hardware, Computer Peripherals, Computer Storage, Consumer Electronics, Other Hardware, Printing & Imaging, and Transaction Management Systems.

TCFD Reporting

In FY2021, Seagate began efforts toward TCFD standards compliance and we expect full compliance in FY2022. Details of our progress are listed below.

1

The responsibility of managing climate related risk and opportunities rest with the Senior Vice President of Business Sustainability and Transformation who reports directly to the Chief Executive Officer. The incorporation of climate change into the business strategy is overseen by the Senior Vice President of Business Sustainability and Transformation. Details of our program can be found in our [CDP Climate Change Disclosure](#).

2

Scope 1, 2 & 3 emissions are disclosed in the [Environmental Sustainability section](#) of this report.

3

Seagate has set Science Based Targets for the reduction of Scope 1,2 & 3 emissions which has been approved by the SBTi. Seagate's reduction targets can be found [here](#).

Acronym Index

3TG	("Conflict Minerals") Tungsten, Tin, Tantalum, and Gold	EMEA	Europe, Middle East, Africa	LGBTQ+	(Lesbian, Gay, Bisexual, Transgender, Queer)	SCS	Singapore Children's Society
AI	Artificial Intelligence	EMS	Environmental Management System	MBM	Metered Baseline Method	SCIP	Substances of Very High Concern in Products
APAC	Asia Pacific	EPA	Environmental Protection Agency	MCI	Material Circularity Indicator	SEC	Securities and Exchange Commission
BCMS	Business Continuity Management System	EPEAT	Electronic Product Environmental Assessment Tool	MIIT	Ministry of Industry and Information Technology	SHPE	Society for Hispanic Engineers
BCRI	Business Continuity Readiness Index	EPP	Expanded Polypropylene	MWh	Megawatt Hour	SSD	Solid State Drives
BPM	Business Process Management	ERG	Employee Resource Group	NAS	Network-Attached Storage	SSHs	Solid State Hybrid Drives
CAS	Chemical Abstract Service	ESG	Environmental, Social, and Governance	NGO	Non-Governmental Organization	STEM	Science, Technology, Engineering, Math
CAEFI	China Association of Enterprises with Foreign Investment	EU	European Union	NSBE	National Society of Black Engineers	SVHCs	Substances of Very High Concern
CAHRAs	Conflict-Affected and High-Risk Areas	FIPPS	Fair Information Practice Principles	NVMe	Non-Volatile Memory Express	SWE	Society of Women Engineers
CCPA	California Consumer Privacy Act	FMD	Full Material Disclosure	OECD	Organization of Economic Cooperation and Development	TA	Talent Acquisition
CEO	Chief Executive Officer	FSC	Forest Stewardship Council	OEM	Original Equipment Manufacturer	TAP	Transition Assistance Program
CEI	Corporate Equality Index	FY	Fiscal Year	ODS	Ozone Depleting Substances	TB	Terabyte
CEPN	Clean Electronics Production Network	GCEC	Global Compliance and Ethics Council	OSHA	Occupational Safety and Health Administration	TCFD	Task Force on Climate-Related Disclosures
CMRT	Conflict Minerals Reporting Templates	GCAR	Global Citizenship Annual Report	OTR	Organizational Talent Reviews	tCO ₂ e	Tons of Carbon Dioxide Equivalent
CO ₂	Carbon Dioxide	GDPR	General Data Protection Regulation	PaYs	Partnership for Youth Success	tCO ₂ e/EB	Tons of Carbon Dioxide Equivalent per Exabyte
CO ₂ e	Carbon Dioxide Equivalent	GHG	Greenhouse Gas	PCDC	Process Chemicals Data Collection	TCO	Total Cost of Ownership
CRT	Cobalt Reporting Template	GRI	Global Reporting Initiative	PLC	Public Limited Company	TCSA	Toxic Substances Control act
CSOP	Corporate Standard Operating Procedures	GWP	Global Warming Potential	PPE	Personal Protective Equipment	TRIR	Total Recordable Case Rate
CY	Calendar Year	HDD	Hard Disk Drive	PUB	Public Utilities Board	TSDF	Treatment, Storage, and Disposal Facility
C&E	Compliance and Ethics Program	HFC	Hydrofluorocarbon	RBA	Responsible Business Alliance	U.S.	United States (of America)
DRC	Democratic Republic of the Congo	IBEC	Irish Business and Employers Confederation	REACH	Registration, Evaluation, Authorization and Restriction of Chemicals	UK	United Kingdom
EB	Exabyte	ICT	Information and Communication Technology	RMI	Responsible Minerals Initiative	UNGC	United Nations Global Compact
EC	European Regulation	IEC	International Electrotechnical Commission	RMO	Recording Media Operations	USITO	United States Information Technology Office
ECHA	European Chemical Agency	ILO	International Labor Organization	RoHS	Restriction of Hazardous Substances	VAP	Validated Audit Program
ECMS	Enterprise Chemical Management System	IPE	Institute of Public and Environmental Affairs	SAQ	Self-Assessment Questionnaire	VCMAAs	Voice Coil Magnet Assemblies
EEO	Equal Employment Opportunity	ISE	Instant Secure Erase	SAS	Serial Attached SCSI	VOC	Volatile Organic Compounds
EHS	Environment, Health and Safety	ISO	International Organization for Standardization	SASB	Sustainability Accounting Standards Board	w/w	Weight by Weight
EHS&S	Environmental, Health, Safety, and Sustainability	ITI	Information Technology Industry Council	SATA	Serial Advanced Technology Attachment	WBCSD	World Business Council for Sustainable Development
ELC	Employee Life Cycle	KPI	Key Performance Indicators	SBTi	Science-Based Target Initiative	WEEE	Waste Electrical and Electronic Equipment
		LCA	Life Cycle Assessment			WRI	World Resources Institute



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