

## **Seagate Technology plc**

### **Information for Shareholders on Irish Dividend Withholding Tax (DWT)**

This information is provided to shareholders of Seagate Technology plc (“Seagate”) as an aid to understanding Irish withholding tax on dividend payments. Dividends paid by Seagate are generally subject to Irish Dividend Withholding Tax (DWT), currently 20%.

Whether Seagate is required to deduct Irish DWT from dividends paid to a shareholder will depend largely on whether that shareholder has provided the appropriate information to Seagate’s transfer agent or to his or her broker and is resident for tax purposes in a “relevant territory.”

A list of the relevant territories is shown in Appendix A. Please note that countries may be added to this list from time to time as Ireland enters into additional taxation treaties; we urge you to consult your tax advisor or the Office of the Revenue Commissioners in Ireland for the most up-to-date list of relevant territories.

### **Shares held by U.S. residents**

If you are a resident of the U.S., dividends paid on your Seagate shares generally will not be subject to Irish DWT, provided that:

- for shares held “beneficially” (i.e., through banks, brokers or other nominees which in turn hold the shares through the Depositary Trust Company (“DTC”)), your address in the broker’s records is in the U.S. and this information is provided by your broker to Seagate’s qualifying intermediary; or
- for shares held “directly” (i.e., directly registered in your own name on Seagate’s shareholder records):
  - you are a holder of record on 2 May 2011, hold a position continuously from that date until the relevant record date, your address in Seagate’s shareholder records is in the U.S. and the dividend payment date falls on or before 30 April 2012; or
  - otherwise, you complete and forward the appropriate Irish Revenue Form V2 to Seagate’s transfer agent (Computershare) at least 7 business days before the record date for the dividend payment.
- PLEASE NOTE THAT FOR ALL DIVIDENDS PAYABLE AFTER 30 APRIL 2012 ALL DIRECTLY REGISTERED U.S. HOLDERS OF RECORD MUST COMPLETE AND FORWARD THE APPROPRIATE IRISH REVENUE FORM V2 TO SEAGATE’S TRANSFER AGENT (COMPUTERSHARE) AT LEAST 7 BUSINESS DAYS BEFORE THE RECORD DATE FOR THE DIVIDEND PAYMENT.

Computershare can be contacted at:

Computershare  
250 Royall Street  
Canton, MA 02021  
Phone: 1-800-962-4284  
Website: [www.computershare.com](http://www.computershare.com)

### **Shares held by residents of relevant territories other than the U.S.**

If you are a shareholder resident as a matter of local law in a “relevant territory” other than the U.S., dividends paid on your Seagate shares generally will not be subject to Irish withholding tax, provided that:

- for shares held beneficially:
  - you are a holder of record on 2 May 2011, hold a position continuously from that date until the relevant record date, your address in the broker’s records is in a relevant territory and this information is provided by your broker to Seagate’s qualifying intermediary and the dividend payment date falls on or before 30 April 2012; or
  - otherwise, you complete and forward the appropriate Irish Revenue Form V2 to your broker before the record date for the dividend payment; or
- for shares held directly:
  - you are a holder of record on 2 May 2011, hold a position continuously from that date until the relevant record date, your address in Seagate’s shareholder records is in a relevant territory and the dividend payment date falls on or before 30 April 2012; or
  - otherwise, you complete and forward the appropriate Irish Revenue Form V2 to Seagate’s transfer agent (Computershare) at least 7 business days before the record date for the dividend payment.

Irish Revenue forms are available at <http://www.revenue.ie/en/tax/dwt/forms/index.html>. Please contact your broker or your tax advisor if you have any questions regarding Irish DWT.

Shareholders who are required to file Irish forms to receive their dividends free of DWT should note that the forms are valid for five years and new forms must be filed before the expiration of that period in order for them to continue to receive dividends without DWT.

### **Shares held by residents of countries that are not relevant territories**

Seagate shareholders who do not reside in relevant territories will be subject to Irish DWT, but there are a number of other exemptions that could apply on a case by case basis. Such shareholders should seek their own advice as to whether and how they may claim such exemptions.

Shareholders who are required to file Irish forms to receive their dividends free of DWT should note that the forms are valid for five years and new forms must be filed before the expiration of that period in order for them to continue to receive dividends without DWT.

### **Important information for all shareholders about Irish withholding tax**

Seagate will rely on information received directly or indirectly from brokers and its transfer agent in determining where shareholders reside, whether they have provided the required U.S. tax information or whether they have provided the required Irish dividend withholding tax forms, as described above. Seagate strongly recommends that shareholders who will need to complete Irish forms as described above do so and provide them to their brokers or Seagate’s transfer agent, as the case may be, as soon as possible. Shareholders who do not need to complete Irish forms should ensure that their residence or required U.S. tax information has been properly recorded by their brokers or provided to Seagate’s transfer agent, as the case may be, as described above.

### **Refunds**

If any shareholder who is exempt from withholding receives a dividend subject to Irish dividend withholding tax, he or she may make an application for a refund from the Irish Revenue Commissioners on the prescribed form.

Irish Revenue forms are available at <http://www.revenue.ie/en/tax/dwt/forms/index.html>

Overall Guidelines are available at:

<http://www.revenue.ie/en/tax/dwt/leaflets/dividend-withholding-tax-guidelines.html>

**APPENDIX A**  
**RELEVANT TERRITORIES**

*(As of April 19, 2011)*

- |                         |                              |
|-------------------------|------------------------------|
| 1. Albania              | 32. Lithuania                |
| 2. Australia            | 33. Luxembourg               |
| 3. Austria              | 34. Macedonia                |
| 4. Bahrain              | 35. Malaysia                 |
| 5. Belarus              | 36. Malta                    |
| 6. Belgium              | 37. Mexico                   |
| 7. Bosnia & Herzegovina | 38. Moldova                  |
| 8. Bulgaria             | 39. Montenegro               |
| 9. Canada               | 40. Morocco                  |
| 10. Chile               | 41. Netherlands              |
| 11. China               | 42. New Zealand              |
| 12. Croatia             | 43. Norway                   |
| 13. Cyprus              | 44. Pakistan                 |
| 14. Czech Republic      | 45. Poland                   |
| 15. Denmark             | 46. Portugal                 |
| 16. Estonia             | 47. Republic of Turkey       |
| 17. Finland             | 48. Romania                  |
| 18. France              | 49. Russia                   |
| 19. Georgia             | 50. Serbia                   |
| 20. Germany             | 51. Singapore                |
| 21. Greece              | 52. Slovak Republic          |
| 22. Hong Kong           | 53. Slovenia                 |
| 23. Hungary             | 54. South Africa             |
| 24. Iceland             | 55. Spain                    |
| 25. India               | 56. Sweden                   |
| 26. Israel              | 57. Switzerland              |
| 27. Italy               | 58. United Arab Emirates     |
| 28. Japan               | 59. United Kingdom           |
| 29. Korea               | 60. United States of America |
| 30. Kuwait              | 61. Vietnam                  |
| 31. Latvia              | 62. Zambia                   |