

Code of Conduct

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At Seagate, our core values - Integrity, Innovation, and Inclusion - shape everything we do. This Code of Conduct (“Code”) turns these values into practical guidance, helping us make ethical decisions, treat others with respect, and conduct business responsibly across the globe.

This Code applies to Seagate employees, board members, and business partners that work on behalf of Seagate.

Letter from our CEO

Dave Mosley

Chairman and Chief Executive Officer



As the world's demand for data continues to grow, Seagate delivers technologies to unlock its full potential and help create a more connected world. We achieve this through the dedication of our people and by following our core values—Integrity, Innovation, and Inclusion. These values define how we work, how we lead, and how we treat one another.

Our culture is built on doing what's right and empowering everyone to contribute and thrive. We all share the responsibility to uphold the highest standards of ethics and integrity. This is the foundation of maintaining trust with each other, with our customers, and with our partners around the world.

Our Code of Conduct reflects our commitments and serves as a practical resource to support ethical and sound decision-making. Read the Code carefully and use it to guide your words, actions, and choices.

Thank you for your dedication to our values and for playing your part in Seagate's efforts to lead responsibly in a data-driven world.

A handwritten signature in white ink that reads "W. Mosley". The signature is written in a cursive, flowing style.

Accountability

Speak Up

If you have a question or see something that might violate this Code, you should speak up. You can talk with any manager, your HR representative, a [Compliance Officer](#), the Legal Department, or contact the Seagate Ethics Helpline at seagate.ethicspoint.com or by using the QR code. The Ethics Helpline is available 24×7 and, where allowed by law, reports can be made anonymously.



Reviewing and Addressing Concerns

We review all reports and will take action if something needs to be addressed based on what we learn. Reports remain confidential if allowed by law and information will only be shared with people who need to know to investigate or resolve the concern raised.

If an investigation is needed, you are required to fully cooperate, and no related information can be concealed or destroyed.

Anyone who violates this Code or applicable laws may be subject to discipline, up to and including termination of employment or services.

Manager and Supervisor Responsibilities

Managers and supervisors play a key role in promoting Seagate's core values. It is important that managers set clear expectations for ethical behavior and foster a safe environment where concerns can be raised without fear.

No Retaliation

At Seagate, we believe everyone should feel safe speaking up. We will not retaliate — and will not tolerate retaliation — against anyone who in good faith reports a concern, helps with an investigation, or engages in any other legally protected activity.

Waivers

A waiver is an exception to any part of this Code and approval must be received for any action that does not follow this Code. Waivers for executive officers or board members require approval from the Board of Directors or an appropriate committee of the Board of Directors. Waivers for everyone else must be approved by the Chief Legal Officer or Chief Compliance Officer.

Respect Others and Professional Conduct

We are committed to treating everyone with fairness and respect, and we value people for their talent, contributions, and potential. Therefore, everyone is expected to follow the standards outlined below.

Harassment, Discrimination, and Violence

We do not tolerate harassment or discrimination as detailed under our Equal Employment Opportunity and Prohibited Harassment, Discrimination, and Retaliation Policy. This applies to all situations where you represent Seagate.

Violence that happens in the workplace or negatively impacts the workplace is also strictly prohibited under our Violence Free Workplace Policy.

If you are harassed, discriminated against, experience violence or witness such behavior, you should report it.

Human Rights

Seagate is committed to ethical conduct and respect for human rights across our global operations and value chain. We encourage you and everyone we interact with — including suppliers, customers, and community members — to use our [Ethics Helpline](#) to report any concerns regarding human rights violations.

Environment, Health, and Safety

We put the health, safety, and well-being of everyone first by focusing on preventing accidents and creating a safe workplace.

Everyone must follow site safety rules, procedures, and emergency protocols, and report any safety concerns.

Drugs and Alcohol

Everyone is expected to comply with Seagate's policies regarding drugs and alcohol. You must not distribute, possess, or use any illegal drugs at work. You must also use good judgment when consuming alcohol during business entertainment or meals.

For more information, see our Drug and Alcohol Free Workplace Policy.

Gifts and Entertainment

Giving and receiving gifts or entertainment can build strong working relationships. However, providing gifts or entertainment to customers, suppliers, or other business partners, or accepting gifts or entertainment from them, can create an actual or potential conflict of interest or be viewed as a bribe. To avoid this, gifts and entertainment can only be given or received when there is a legitimate business purpose, they are not extravagant under the circumstances, and they follow our policies. You must also not give or receive gifts that are cash or cash equivalents.

For more information on gifts and entertainment, and for specific limits and exceptions, see our Gifts and Entertainment Policy and Travel and Expense Policy. Rules for receiving gifts may differ by Seagate site. Check with your local site management team for site-specific rules.

Gifts or Entertainment to Government or Public Officials

Giving gifts or entertainment to government or public officials — or their family members — may create the appearance of an improper benefit. For this reason, giving gifts or entertainment to government or public officials is not allowed. For any exceptions to this rule, you must get approval from the Chief Legal Officer or Chief Compliance Officer.

Government or public officials include people from any government agency (local, state, or national), state-owned enterprises, public international organizations such as the UN or World Bank, and public schools or universities.

Protect Seagate

Confidential Information and Intellectual Property

OVERVIEW

Confidential information is any non-public information that belongs to Seagate or that has been shared with us by others under a confidentiality obligation. This includes things like business plans, financial data, technical documents, product designs, customer lists, and supplier details.

Intellectual property is also a form of confidential information until it has been made public. It includes inventions, designs, software, trademarks, copyrights, patents, and trade secrets.

MANAGING CONFIDENTIAL INFORMATION

Seagate confidential information and third-party confidential information must be protected and treated with care. You must:

- only share it with people who need to know, both internally and externally
- not share it outside the company unless a legal agreement is in place (like a non-disclosure agreement)

If you are not sure whether something is confidential, talk to your manager or the Legal Department. For more information, see our Data Classification Policy.

OWNERSHIP OF INTELLECTUAL PROPERTY

During your employment at Seagate, any intellectual property relating to Seagate's business that you create, that you assist in creating, or that uses Seagate resources, belongs to Seagate. You are required to disclose any such intellectual property and assist Seagate in documenting it.

Accurate Records

Accurate and complete business records are a foundation for meeting our legal obligations. They help us make sound decisions and give an honest picture of how our business is performing.

All records must be accurate and complete and recorded promptly and clearly. Records must not be falsified, misrepresented, or intentionally omit key information. This is fraud, and will not be tolerated.

Records Retention

For all records we create, receive, or maintain, you must follow our Records Retention Policy and Schedule.

If records are subject to a legal hold, those records must be kept even if they are past their normal retention period. For more information, see our Legal Hold Policy.

Artificial Intelligence (AI)

Seagate embraces innovation and recognizes the potential of AI to improve how we do business. Our approach to using AI in our business is guided by a commitment to ethical principles, safety, compliance with evolving global standards, and our policies.

For more information, see our Artificial Intelligence Use Policy.

Taking Care of Seagate Property

Our facilities, supplies, equipment, and other resources help all of us do our jobs well. Please treat these items with care - keep them safe, use them responsibly, and help prevent loss, damage, or waste.

For more information, see our Acceptable Use of Seagate Electronic Systems, Services, and Equipment.

External Communications and Social Media

Your external communications (including social media posts) must not disclose Seagate confidential information or represent (or otherwise give the impression) that you are speaking on behalf of Seagate unless you are authorized to.

Our Chief Executive Officer, Chief Financial Officer, Senior Vice President of Investor Relations, and Vice President of Investor Relations or other people specifically designated by them, are the only authorized people who can communicate about Seagate with investors, shareholders, and the financial community, including financial analysts.

You may not communicate or engage with the press or other external communications channels on behalf of Seagate unless you are authorized to do so under our External Communications Policy.

You should use social media in a way that is consistent with this Code and our policies, including not using it to harass or discriminate against others.

For more information, see our External Communications Policy and Social Media Policy.

Sustainability

Seagate is committed to developing and maintaining sustainable and responsible practices in our global operations and value chain, and we comply with all applicable environmental regulations. You should be aware of environmental issues affecting your site and local community and do your part to help prevent pollution, reduce waste, and conserve natural resources.

We encourage you and all stakeholders - including suppliers, customers, and community members - to use our [Ethics Helpline](#) to report any concerns about environmental impacts.

For more information, see our Responsible Sourcing of Minerals Policy, Environment, Health, Safety, and Sustainability Policy, and our Sustainability Site.

Follow the Law

You must follow all applicable laws, rules, and regulations that apply to Seagate, and not engage in illegal activities at work. Where conduct may be legal but violates this Code, you must follow the Code. If a law is stricter than this Code, you must follow the law.

Below is an overview of some of the important laws that apply to Seagate and advice on how to follow them.

If you have any questions or concerns about the laws that apply to Seagate, how to comply with them, or see behavior that might be a violation of law, contact the Legal Department, a [Compliance Officer](#), or the [Ethics Helpline](#).

Competition and Antitrust Laws

Competition and antitrust laws exist to protect consumers, competitors, and a fair marketplace. Seagate will not attempt to eliminate or reduce competition through illegal agreements with anyone. In particular, agreements with competitors or companies we do business with are subject to scrutiny in all locations where we operate.

To stay in compliance with competition and antitrust laws, you must not:

- agree with a competitor to fix prices, fix wages, not hire one another's employees, restrain trade, or allocate markets, or customers
- exchange information with competitors regarding price, costs, inventories, capacity plans, or other competitively significant data
- agree with distributors or resellers on the resale pricing of Seagate products, unless approved by the Chief Legal Officer or Chief Compliance Officer
- violate competitive bidding practices, or rig or fix the outcome of a bid

For more information, see our Antitrust Policy.

Anti-Bribery and Anti-Corruption

At Seagate, we do not tolerate corruption in any form and comply with all applicable laws. Bribery is a form of corruption and means offering or giving anything of value to obtain or retain business or secure an improper advantage. You must not offer, promise, give, request, or accept a bribe under any circumstances from any company, individual, or public authority.

To avoid the appearance of a bribe when giving or receiving legitimate gifts or entertainment, follow the Gifts and Entertainment section of this Code and the requirements of our Gifts and Entertainment Policy and Travel and Expense Policy.

Kickbacks are a form of bribery and happen when someone gives something - money or anything of value - in return for a favor, discount, or benefit. Facilitation payments are also a form of bribery and occur when payments are made to speed up routine, non-discretionary government processes. Both are strictly prohibited.

For more information, see our Anti-Bribery and Anti-Corruption Policy.

Insider Trading

You must not use or share material non-public information to buy or sell securities (such as Seagate stock or debt). Material non-public information is information that is not available to the public and which a reasonable investor would consider important in deciding whether to buy, sell, or hold securities. “Tipping” someone else – such as family, friends, or colleagues – with material non-public information and suggesting when to make trades is also prohibited.

For more information, see our Insider Trading Policy.

Trade Controls and Sanctions

Many countries have laws that limit how products, technology, or services can be shared across borders or with certain parties. These laws can also restrict support of sensitive or controlled end uses, including activities related to supercomputing, the military, or military intelligence.

If your work involves international shipments, cross-border transactions, or other situations where you are providing products, technology, or services to companies or people outside of Seagate, or internally across the company, you can stay compliant with trade rules by following Seagate’s trade control processes and policies. If uncertain, consult International Trade Administration or the Legal Department for guidance.

For more information, see our International Trade Compliance Policy and our management commitment statement on trade compliance.

Data Privacy

Seagate takes its responsibility to protect personal data seriously and follows all applicable privacy laws. Our policies set out principles for how personal data should be collected, processed, stored, shared, and disposed of. Everyone handling personal data is expected to follow these policies.

When handling personal data, you should:

- only collect personal data to support legitimate business activities
- access personal data only where necessary to perform your job
- use appropriate safeguards to protect personal data
- promptly raise concerns or potential security issues involving personal data with the Legal Department

For more information, see our Global Privacy Policies and [Privacy Center](#).

Avoid Conflicts of Interest

A conflict of interest occurs when you have competing loyalties that could negatively impact Seagate's business, financial health, or competitive edge, or that might appear inappropriate or raise questions. It is important to avoid circumstances that create either actual or potential conflicts. If you are unsure whether a situation might be a conflict, ask the Legal Department or a [Compliance Officer](#).

Seagate conducts an annual conflicts of interest certification process for you to disclose any actual or potential conflicts of interest. In addition, Seagate requires you to disclose any actual or potential conflicts of interest when they occur by completing a conflicts of interest form. You must also update your disclosure whenever circumstances change. Disclosures will be assessed for approval on a case-by-case basis.

Guidance for Common Conflicts of Interest

It is difficult to identify all possible conflicts of interest, but below is guidance for certain situations where conflicts of interest may arise.

Personal Relationships

Personal relationships at work can create a conflict of interest. A personal relationship covered by this Code includes any relationship that is romantic, familial, financial, or that could affect your behavior, judgment or decision-making at work. This can include relationships with other employees or business partners. You must not make or influence employment or business decisions related to someone you have this type of personal relationship with.

For more information, see our Relationships at Work Policy.

Personal Investments

You should not invest in companies that compete with Seagate or do business with Seagate when the investment creates a conflict of interest. Personal investments can create a conflict of interest when you are in a position to influence the relationship between Seagate and a business you are invested in, or the investment influences how you perform your job. You also should not invest in a current or potential Seagate business partner if you have non-public information about them.

Holdings in mutual funds, index funds, or Exchange Traded Funds (ETFs) are not considered direct investments and do not have to be disclosed as conflicts of interest.

Prediction Markets and Speculative Activities

You may not participate in any prediction markets (such as Kalshi or Polymarket), betting, or other speculative activities where Seagate is the subject of a bet or prediction. Even if Seagate is not the subject of a bet or prediction, you may not use Seagate confidential information, including confidential information learned through Seagate about a Seagate business partner, to participate in such activities.

Personal betting or speculative activity involving Seagate or Seagate-related confidential information may be illegal, result in improper use of company information, and may also create a conflict of interest, as your personal interests may not align with Seagate's.

Outside Employment or Directorships

A conflict can arise if you are involved in an outside commitment — including owning a business, or serving as an advisor, director, consultant, or employee for another business — that competes with Seagate, uses Seagate resources, or affects your ability to make fair and objective decisions for Seagate. Even the appearance of a conflict can be problematic.

You are also expected to devote your full professional efforts, attention, and time, to your role at Seagate. Taking on an outside commitment like a second job, running a side business unrelated to Seagate (also known as moonlighting), or board membership, can present a conflict of interest if that outside activity interferes with your ability to properly perform your job duties at Seagate.

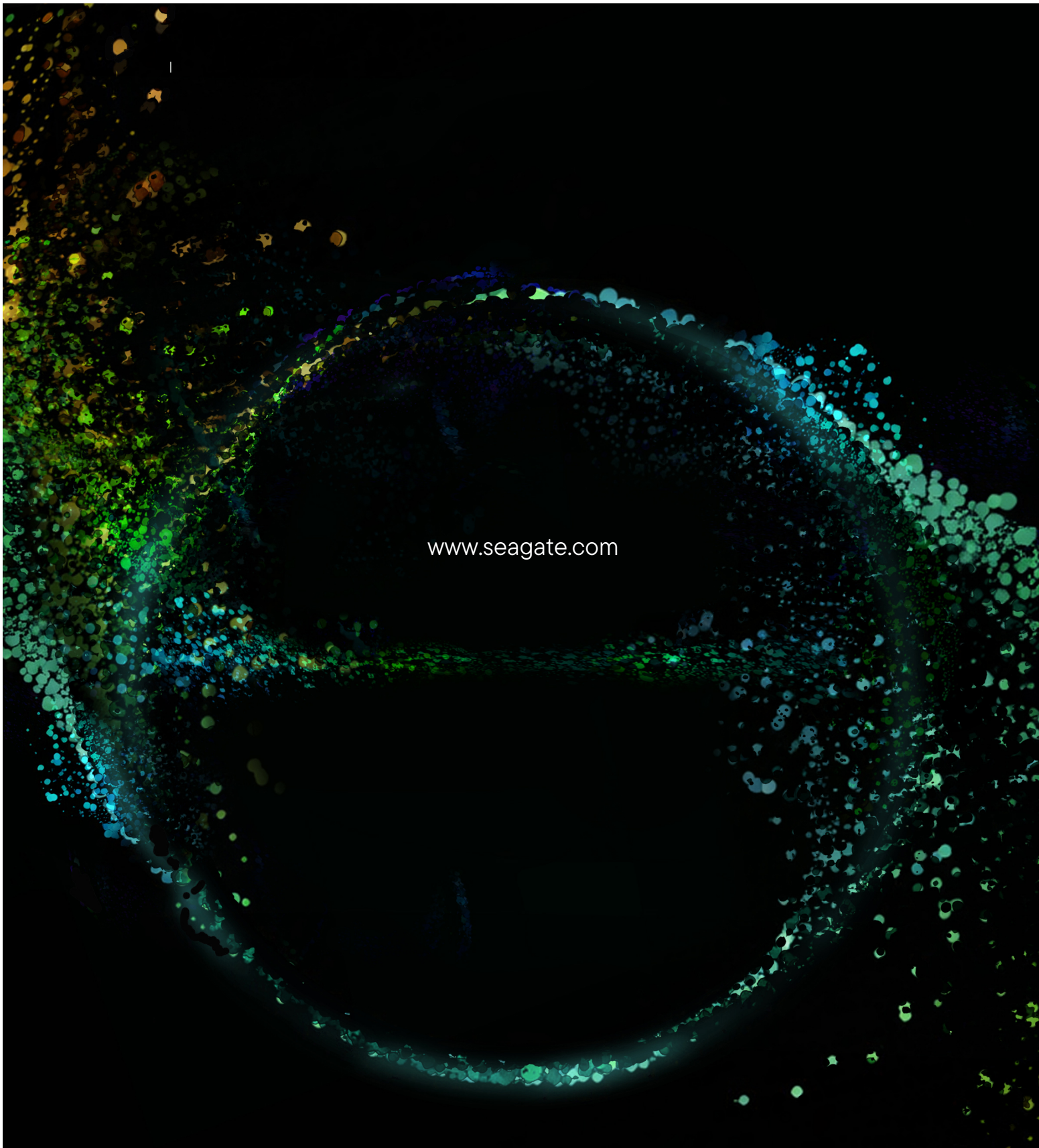
You must follow the conflicts of interest process and obtain approval to take part in outside commitments that could present a conflict of interest. For board memberships, if approved, employees are limited to serving on one board. Board members, our executive officers, and our CEO are also subject to specific rules for board membership as listed in our Corporate Governance Guidelines.

Participating in Trade and Industry Associations and Technical Standards Groups

Participating in trade associations or standards groups may sometimes create conflicts with your Seagate duties and can raise intellectual property or antitrust concerns. You must follow the conflicts of interest process and obtain approval to take part in any trade association or technical standards activities in any personal or professional capacity.

Diverting Business Opportunities

You must not compete with Seagate or use its property, information, or your role for personal benefit. Any business or investment opportunity that could belong to Seagate must first be offered to Seagate before you take advantage of it. Similarly, you must not assist others — including family members — in taking business or investment opportunities that rightfully belong to Seagate for their own benefit.



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