

# SUSTAINABLE DATASPHERE

FY2022 ESG PERFORMANCE REPORT

# Contents

## INTRODUCTION

**04** Letter from Our CEO

**06** ESG Highlights

**14** Key Focus Areas for FY2023

**17** About This Report

**21** About Seagate

## PLANET

**26** Environmental Moonshots

**27** Environmental Sustainability

**52** Product Sustainability and Circularity

**61** Restricted Substances

**66** Critical Materials

## PEOPLE

**70** Our Employees

**75** Human Rights and Working Conditions

**80** Diversity, Equity, and Inclusion (DEI)

**92** Employee Development, Engagement, and Retention

## PROSPERITY

**101** Community Engagement

**104** Health and Wellbeing

**115** Supply Chain

**123** Stakeholder Engagement

**126** Business Continuity

## GOVERNANCE

**130** Code of Conduct

**132** Compliance and Ethics

**134** Board of Directors and Board Committees

**139** Shareholder Engagement

**140** Data Governance

**142** Product Security

**144** Ethics Helpline and Reporting

**146** Public Policy Advocacy

## INDICES

**148** Acronym Index

The fiscal year (FY) 2022 Sustainable Datasphere: ESG Performance Annual Report describes Seagate's approach to advancing sustainable and responsible business practices in all aspects of our products, services, employees, and operations. Published on April 24, 2023, this report provides highlights, insight, and context for Seagate's FY2022 performance and goals for FY2023 and beyond.

In FY2022, Seagate reports to the 2021 Global Reporting Initiative (GRI) Universal Standards, which is a change from previous years using the 2016 GRI Universal Standards. Throughout this report, text is electronically linked to other external resources for in-depth review. Seagate now has a separate document for reporting indices available [here](#).

Inquiries regarding this report or its contents should be directed to: [social.response@seagate.com](mailto:social.response@seagate.com)



# Letter from Dave Mosley, CEO

I am honored to share Seagate's Sustainable Datasphere: FY2022 ESG Performance Report, which reflects the progress we continue to make toward our mission of crafting a more sustainable datasphere. At Seagate, we have always believed in data's potential, which is why we are driven to help the world store and protect it. To be successful, however, we must lead the way in addressing the numerous environmental, social, and governance (ESG) impacts and challenges our industry presents. We have renamed this report to Sustainable Datasphere: FY2022 ESG Performance Report to emphasize Seagate's commitment to our people, planet, and prosperity.

**We Are Sustainability Driven.** In FY2022, we strengthened our internal commitment and external transparency regarding sustainability. On Earth Day, Seagate announced ambitious moonshot goals on renewable energy and carbon neutrality.

## On Earth Day 2022, Seagate announced two environmental moonshot goals:

- 1 100% renewable energy by 2030 in our manufacturing and R&D sites.
- 2 Carbon neutrality by 2040.

We also operationalized a comprehensive Sustainable Datasphere portfolio, setting targets and aligning our business processes to increase the sustainability of our operations, products, and our products' use and end of life. Priorities include lowering greenhouse gas emissions in our operations, designing our products to use less of the earth's finite resources, and expanding product take-back programs for drive reuse and materials recycling.

However, Seagate alone cannot achieve these goals and ambitions. We must fully engage our entire ecosystem of technology stakeholders to innovate and elevate the industry's overall sustainability commitment. While challenges exist, I am confident we will reach Seagate's goals through the collective dedication of our worldwide manufacturing operations, global supply chain, customers, and numerous external partners.

**We Are People Driven.** The key to Seagate's success in FY2022 has been the tens of thousands of our employees around the world who exemplify our values of integrity, innovation, and inclusion. Each day, Seagate teams apply innovation to the creation and delivery of Seagate's products and services. Our culture is vibrant and dynamic because our workforce is equipped to succeed professionally within diverse and inclusive teams. Around the world, employees are ensuring that Seagate meets the highest standards of ethical conduct and working conditions. We closely adhere to the Code of Conduct of the Responsible Business Alliance, in which we continue to play a major leadership role, as well as to the United Nations Global Compact.

**We Are Accountability Driven.** To achieve our goals, strong controls are in place that ensure the success of our programs, accountability through performance metrics, and verifications through internal and external audits. Data privacy and protection is paramount for the success of our customers, partners, and employees, and we are leading within the industry in crafting a safe and secure datasphere for all our stakeholders. Our senior leadership team was accountable for achieving our priorities in FY2022, while our Board of Directors provided oversight and corporate governance. We continued to demonstrate Seagate's value of integrity by transparently reporting our ESG progress to prominent standards boards in FY2022, such as the Global Reporting Initiative (GRI).

**We Are Success Driven.** Delivering the best data storage hardware, software, and services is our overriding goal. Together, with our stakeholders, we will also continue to make a measurable difference in minimizing our environmental impact, expanding wellbeing and opportunities for people around the world, and sustaining long-term prosperity. Thank you for partnering with Seagate on our mission to craft a Sustainable Datasphere.



**Dave Mosley**  
CEO



## 01



## ESG Highlights



**INTEGRITY  
INNOVATION  
INCLUSION**

### Seagate Values

Seagate's values—integrity, innovation, and inclusion—serve as our operating foundation and direct our approach to ESG. We recognize that businesses have the power and opportunity to make a difference in our world. At Seagate, we strive to be a leader in sustainable, responsible industry practices that in turn have a positive impact on our customers, industry peers and associations, supply chain partners, governments around the world, and civil society.

We believe our company can be a positive example and force for good throughout the world as we:

- Protect the remarkable planet that we share through our sound environmental policies and best practices.
- Take concrete action to be a catalyst for social good by providing everyone—current and potential members of our team, partners in our supply chain, and people in the communities where we live and work—with equitable opportunities.
- Ensure strong governance and accountability through actively involving our diverse Board of Directors and numerous stakeholders. This includes all levels of our workforce who, through multiple communication channels, share their insights related to equity and other ESG-related principles.

Our ESG management structure and governance is comprised of strategic goal setting, assurance and reporting, stakeholder management, and operationalizing progress. Subject matter experts across Seagate contribute ESG-related recommendations regarding projects, resources, goals, and data to ensure we make progress. A cross-functional executive steering committee provides internal oversight of our ESG program. Our Board of Directors is regularly informed of our ESG goals and progress.





In FY2022, Seagate continued to play a leadership role in the Responsible Business Alliance (RBA). Seagate's Senior Vice President of Sustainability and Transformation served as RBA's Board Chair, transitioned to Immediate Past Chair during the fiscal year, and continued to serve on the Board's Executive Committee. In addition, Seagate employees contributed their expertise by leading and participating in the assessments workgroup as well as other RBA workgroups. Seagate continued partnerships with industry organizations, including the Clean Electronics Production Network (CEPN), the Responsible Minerals Initiative (RMI), IPC International Inc., and International Electrotechnical Commission (IEC). These engagements focus on advancing sustainability efforts across the industry on a global scale.

To achieve our goals, we commit to continuous improvement based on key standards provided by the International Organization for Standardization (ISO) on environmental topics. We also report in accordance with GRI Standards and comply with 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.

### Planet: We Are Sustainability Driven

As a vertically integrated organization that produces data storage technology and infrastructure solutions with seven different manufacturing sites around the world, Seagate recognizes that we must responsibly address the environmental impacts created by our operations. We remain committed to our Science Based Targets and are making meaningful progress towards our Environmental Moonshot Goals. Our values of integrity and innovation drive our priorities: lowering greenhouse gas (GHG) emissions in our operations, designing our products to use less of the earth's finite resources, and expanding product takeback programs for drive reuse and materials recycling. What follows is a snapshot of the advances we have made:

**~21K MWh**

of electricity saved through energy conservation and efficiency initiatives in FY2022, exceeding our initial conservation goal of 10K MWh

**87%**

(~27K metric tons) of non-hazardous waste diverted from landfills in FY2022

**5.8% ↓**

reduction of absolute market-based scope 2 operational emissions in CY2021 vs. CY2020

**82%**

of hazardous waste generated in FY2022 was recycled

**~1M Drives**

returned to service through refurbishment and redeployment in CY2021

**1,352 MWh**

of on-site solar energy generated in FY2022

**17.5% ↑**

increase in water recycling in CY2021 from CY2020

**17.1% ↓**

decrease in water intensity (megaliter per EB) in CY2021 from CY2020



### People: We Are People Driven

Our people make a difference every day enabling Seagate to be a leader in the industry. We are committed to promoting employee engagement and growth, cultivating an equitable, diverse, and inclusive workforce, upholding labor and human rights laws, providing a safe and secure work environment, and fairly compensating our employees. We show the same drive and commitment to excellence in the community as we do in our day-to-day operations.

As an example, Thailand Department of Industrial Works presented Seagate with the Corporate Social Responsibility Award for our commitment to social responsibility in seven key areas: organizational governance, human rights, labor practices, environment, fair operating practices, consumer issues, and community involvement and development. In addition to compliance with standard regulations, the award also focuses on engagement with local communities.

Our value of inclusion underpins policies and practices that support a safe and respectful workplace by addressing the following: diversity, equity, and inclusion; professional development; employee engagement; and employee health, safety, and wellbeing. In addition, Seagate strives to maintain an ethical workplace and uphold human rights while adhering to international standards. These practices allow all employees to engage in and share in Seagate's success.

**~281K**

hours of learning and development completed in FY2022 by our employees<sup>1</sup>

**99%**

of non-manufacturing specialist employees completed their goal setting and year-end review processes in FY2022

**9.1%↑**

increase in inventions with 1+ female inventors in FY2022

**3,600**

global members representing nine employee resource groups (ERGs) and over 27 local chapters across all ERGs in FY2022

**1.4%↑**

increase in women in leadership from FY2020 to FY2022

**352**

mentorship assignments established in FY2022, enabling employees to expand their network and find career or skill-based guidance

<sup>1</sup> Includes training from the Seagate learning platform, LinkedIn Learning, and our other internal training programs. Manufacturing specialist employees have a comprehensive training plan that includes a combination of classroom training and on-the-job training based on job function. On-the-job training hours are not currently captured in our learning platform and are not available for reporting.





## Prosperity: We Are Success Driven

At Seagate, we define prosperity as enhancing value and contributing toward success for all our stakeholder groups, including customers, investors, employees, partners, suppliers, and the communities in which we work and live. We align to stakeholder concerns by seeking input regarding our performance, ESG commitments, and strategic direction.

To achieve prosperity for our diverse stakeholders, we deliver numerous programs that leverage our values of integrity, innovation, and inclusion. These include safety and wellbeing, strict forced-labor controls, employee health and wellness, community engagement, supplier diversity, and supplier education opportunities. Through these efforts, we strive to ensure the long-term success and prosperity of Seagate and our stakeholders.

131

different engagements and partnerships conducted in local communities in FY2022<sup>1</sup>

20%↑

increase in supplier diversity spend from FY2021 to FY2022<sup>2</sup>

0

No cases of child labor<sup>3</sup> or forced labor were found within Seagate's manufacturing operations in the FY2022 RBA Validated Audits

125

direct and packaging suppliers completed the RBA environmental survey in FY2022 (70% have GHG reduction targets and 67% have water reduction targets)

<sup>1</sup> A decrease from previous years as some programs were suspended due to COVID-19.

<sup>2</sup> Supplier diversity references the United States only.

<sup>3</sup> We have established age 18 as a standard minimum age for employment at all sites, which complies with or exceeds local legal requirements.

## Governance: We Are Accountability Driven

Our corporate governance standards and practices bolster 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, compliance, and ethics. Seagate demonstrates our value of integrity by executing our commitments in these areas.



### In FY2022



Implemented industry best practices for the Seagate Ethics Helpline.



Strengthened data governance by implementing encryption-based data protection tools and automating key compliance processes.



Rolled out new, tailored Code of Conduct training and certifications to all non-manufacturing specialists, with a 99.5% completion rate.



Improved Enterprise Security Risk Management (ESRM) controls and processes around technology, tools, and training.



Matured the Global Compliance and Ethics Council (GCEC), enhancing operational effectiveness of Seagate's Compliance and Ethics Program.



# Key Focus Areas for FY2023



## Planet

In FY2023, Seagate will continue efforts to decrease our negative impacts on the planet. With the recent achievement of reaching over 50% of energy used being renewable, Seagate aims to maintain our successful program and expand it in the coming years to reach our moonshot goal of using 100% renewable energy in our manufacturing, research, and development sites by 2030. Enabling a circular economy is a priority and we aim to continue our projects with industry partners to extend opportunities to reuse, refurbish, recover, and reclaim our products and components. In addition, we plan to meet a 2% year-over-year water reduction goal, achieve our 88% solid waste diversion rate, and save 10,000 MWh of energy from our conservation projects.

## People

In FY2023, Seagate will continue to execute our people strategy. We plan to implement a minimum of 40 hours of learning/training as a requirement for all non-manufacturing specialists to build a culture of continuous learning and skill development. In addition, we will continue our commitment to employee safety and wellbeing by addressing risks and successfully meeting all labor and human rights requirements of the RBA. To increase our employee engagement, we plan to grow our employee resource groups by region and chapter, including the three new chapters started in FY2022.

## Prosperity

In FY2023, Seagate will continue working with our suppliers to curtail the risk of forced labor, further their environmental commitments, and mature our business continuity management system (BCMS) practices. Within our supply chain we will continue to conform to the RBA Code of Conduct and ensure responsible sourcing of minerals while advocating for our suppliers to do the same within their own supply chain. By applying our FY2022 learnings, we will continue to mature Seagate's BCMS through an expanded business continuity planning scope, including risk mitigation and targeted action improvements. In FY2023, we plan to add to our supplier risk mitigation database to make sure we have supplier risk mitigation plans to follow for any newly identified risks requiring mitigation. In addition, we plan to continue expanding our supply chain mapping efforts focusing on surveying our tier 2 suppliers (our suppliers' suppliers).



## Governance

In FY2023, Seagate's existing governance programs will continue to mature and innovate. Driven by our value of integrity, we plan to assess the key aspects of our Compliance and Ethics Program, including our Global Compliance and Ethics Council (GCEC), which remains an essential forum for leadership at Seagate to align on compliance and ethics strategies and programs. In addition, we intend to enhance key compliance and ethics training completion rates through engaging learning materials and techniques that will facilitate employee comprehension and retention. We aim to continually improve our processes, tools, and training around effective data protection controls and records management resources, with the focus in FY2023 being to increasingly utilize electronic records rather than hard copies and implement dynamic data loss prevention tools. We seek to be an industry leader in product security and intend to continue innovating and leading in this space through new programs and offerings.



# 03

## About This Report

This report covers activities managed by Seagate Technology Holdings public limited company, an Irish public limited company, during our FY2022, which ran from July 3, 2021 through July 1, 2022, and in select cases, during the 2021 calendar year.

References to "Seagate," "we," "us," "our," and the "Company" within this report refer to Seagate Technology Holdings public limited company and its subsidiaries. References to "\$" are to United States (U.S.) dollars. There were no significant changes to Seagate's size, ownership, or supply chain in FY2022; 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 annual reports can be viewed and downloaded from the Seagate website at [www.seagate.com](http://www.seagate.com), including last year's FY2021 report, which covered Seagate's financial reporting cycle from July 4, 2020 through July 2, 2021, and in select cases the 2020 calendar year. The Seagate website contains supplementary information about our company's history, products, values, management, and financial performance. More information covering our operations in FY2022, 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 1, 2022.

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 anticipated execution on our environmental, social, and governance priorities and goals; anticipated actions relating to our customers, suppliers, and industry; our planned operations and implementation of action items; our estimated ability to meet or exceed targets; and anticipated commitments and strategies.





Forward-looking statements generally can be identified by words such as “expects,” “intends,” “plans,” “anticipates,” “believes,” “estimates,” “seeks,” “targets,” “projects,” “commits,” “should,” “may,” “will,” “continue,” “can,” “could” or the negative of these words, variations of these words, and comparable terminology, intended to refer to future events or circumstances. Forward-looking statements involve uncertainties and risks that could cause our actual results to differ materially from any present expectations or projections expressed or implied by such forward-looking statements. 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 most recently filed periodic reports on Form 10-K and Form 10-Q, and in the Company’s other filings with the 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, and expressly disclaims any duty to update or revise any forward-looking statements, including in response to new or changed information. Readers should not place undue reliance on the forward-looking statements in this report.

In this 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.

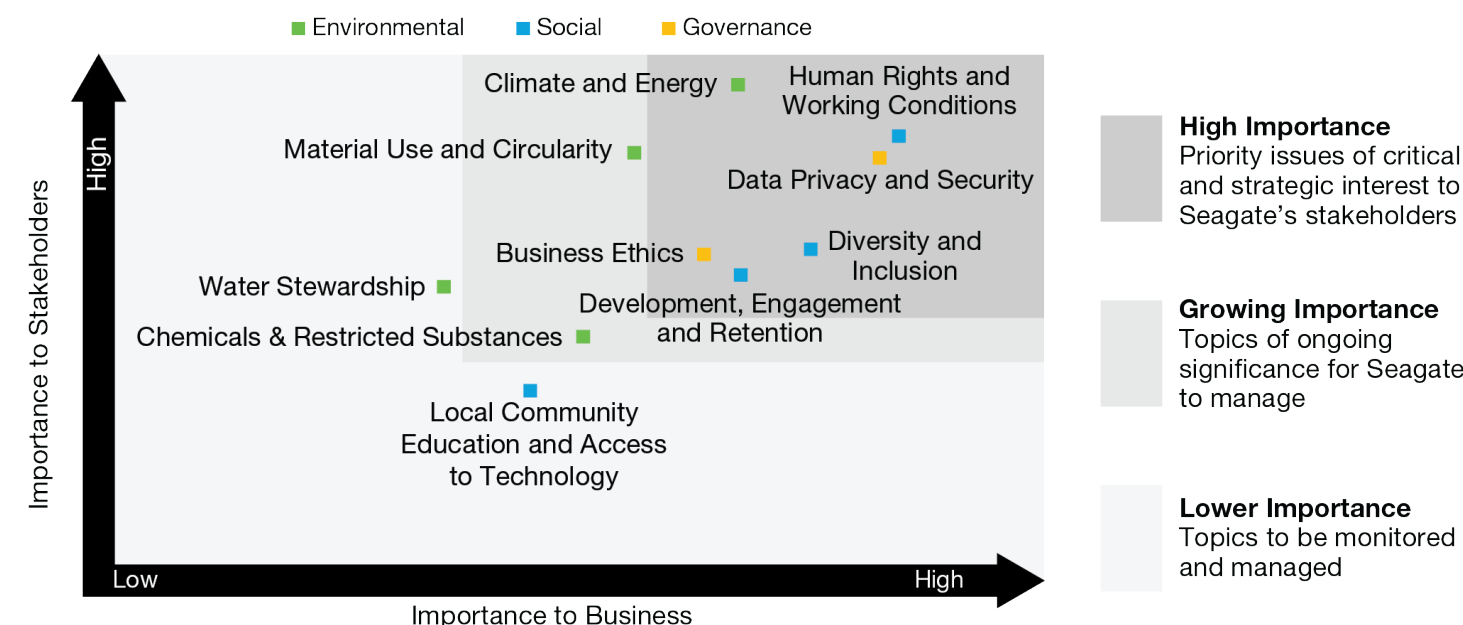
## Defining Report Content

The Sustainable Datasphere: Fiscal Year 2022 ESG Performance 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. 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 Sustainable Datasphere: ESG Performance Indices and are available on [www.seagate.com/esg](http://www.seagate.com/esg).

In FY2020, Seagate engaged a third party to conduct a sustainability materiality assessment to identify, prioritize, and validate the issues most significant to our business and stakeholders. The assessment reviewed industry standards and external trends covering ESG topics. To develop a comprehensive understanding of Seagate’s significant impacts, where impacts occur, and the ways issues may influence the assessments and decisions of stakeholders, Seagate spoke with internal and external stakeholders. No issue was intentionally excluded from the scope of the assessment. The topics identified as material to our business were categorized into governance, planet, people, and prosperity. These topics—along with stakeholder feedback gathered during the materiality assessment—helped shape the content and structure of this report.

We review our materiality assessment annually. After our review in FY2022, we concluded that the assessment from FY2020 remained valid. To ensure continued relevance of our FY2020 materiality assessment, in FY2022, Seagate conducted internal risk assessments. Those concluded that there were no new topics of material value to report. A breakout of material findings and their subtopics, as well as policies that drive our commitment and compliance, can be found in our Sustainable Datasphere: ESG Performance Indices. We will continue to review business operations each year and conduct sustainability materiality assessments as needed.

## 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 International Organization for Standardization (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.



# 04

## About Seagate

**Seagate is a leading provider of data storage technology and solutions.**

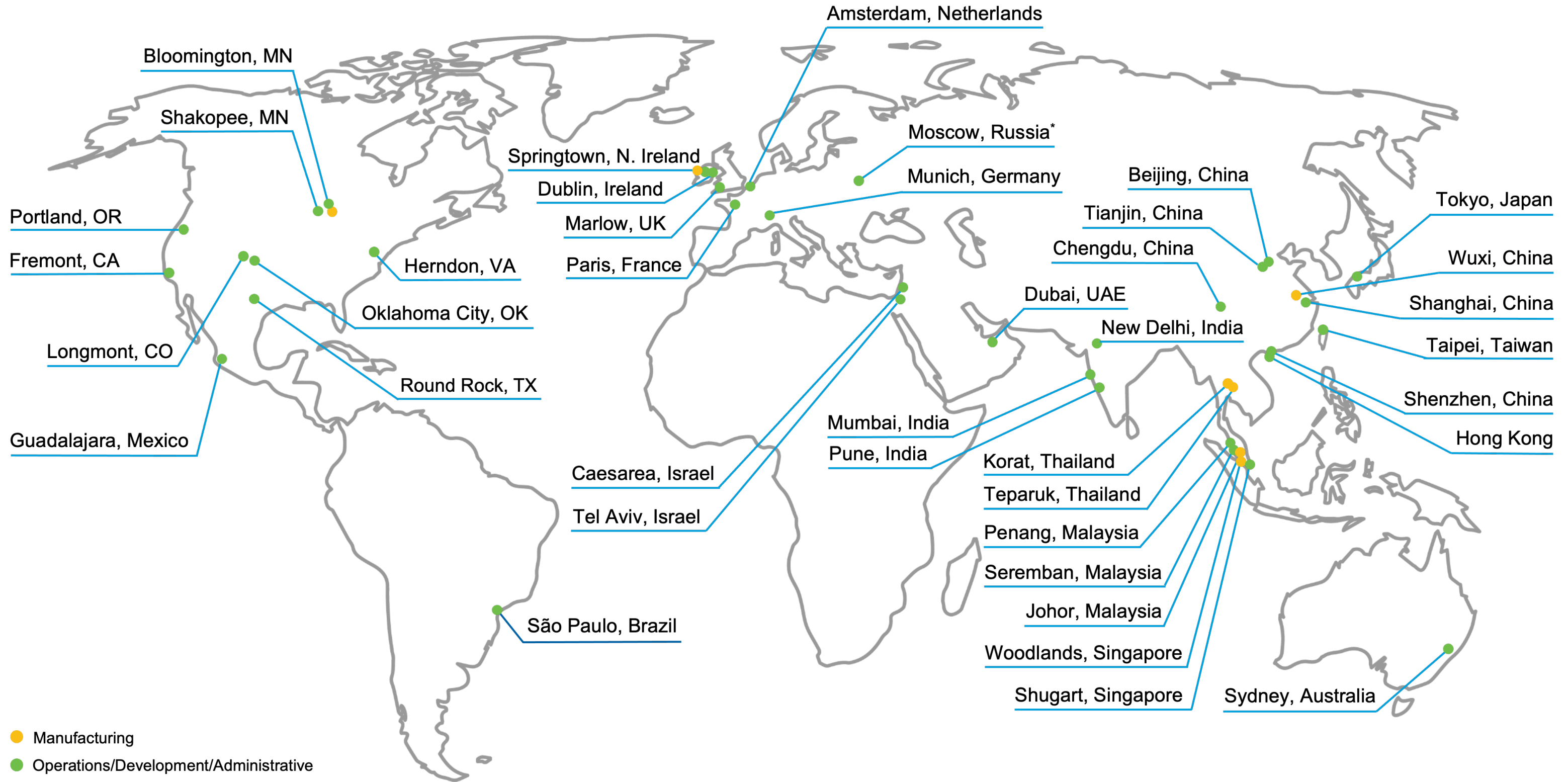
Our principal products are hard disk drives, commonly referred to as disk drives, hard drives, and HDDs. In addition to HDDs, we produce a broad range of data storage products, including solid state drives (SSDs), solid state hybrid drives (SSHDS), and storage subsystems, as well as a scalable edge-to-cloud mass data platform that includes data transfer shuttles and a storage-as-a-service cloud. All products are shipped under the Seagate, LaCie, Lyve, 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. Seagate's HDD products are designed for mass capacity storage and legacy markets. Our HDD and SSD product portfolio includes designs based on serial advanced technology attachment (SATA), serial attached SCSI (SAS), and non-volatile memory express (NVMe) 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. Seagate's 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), Europe, the Middle East, and Africa (EMEA).

Seagate maintains 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.





\* We have decided to cease our operations in Russia and close the Moscow branch office in FY2022.

Seagate is headquartered in Ireland. At the end of FY2022, we had 52 global sites, excluding surplus and subleased locations. Our seven operations sites are located in China, Malaysia, Singapore, Thailand, the United Kingdom, and the United States.

In FY2022, Seagate reported net revenue of approximately \$11.7 billion USD and shipped approximately 631 exabytes of HDD storage capacity. More information can be found in our annual report on Form 10-K for the fiscal year ended July 1, 2022.





# PLANET



# 05



## Environmental Moonshots

**In FY2022, Seagate pledged to power our manufacturing and R&D sites with 100% renewable energy by 2030, and to achieve carbon neutrality by 2040.**

In FY2022 on Earth Day, Seagate established ambitious, long-range environmental moonshot goals to advance a sustainable datasphere. Our moonshot goals reflect Seagate’s long-standing commitment to environmental sustainability and public accountability, spanning our products, operations, and supply chain. Together with the efforts described in this section, Seagate aims to make a measurable difference in addressing climate change.

Read more about our moonshots [here](#).



## Environmental Sustainability

Seagate recognizes that climate change and environmental damage are real and mainly caused by human activity. We must be responsible to our people, the planet, and our own long-term sustainability while working to reduce our impact. Our global environmental sustainability efforts play a critical role in how we do business. We regularly set goals to track our progress on important indicators with all efforts in reducing our energy consumption, carbon emissions, waste, and water usage being supported by senior management. Seagate works with several outside organizations, such as the RBA, UNGC, and SBTi, to further our efforts. We educate our suppliers and key stakeholders on sustainability and performance measurement best practices. These actions comprise 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.



# 06

## Management Systems

Our environmental management system is shaped by ISO standards, the RBA Code of Conduct, UN Global Compact 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, regulation, and performance against targets. Overall, we believe the system functions effectively and adjustments are made as needed.

At the end of FY2022, all Seagate’s manufacturing sites maintained certification to the ISO 14001 Environmental Management System (EMS). The EMS covers our manufacturing sites and central function, similar to ISO 45001. Seagate had 28 environmental regulatory visits (these include site visits, air monitoring, and wastewater sampling) and received no violations in FY2022.





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 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

Energy use and process chemical use incurred by Seagate are necessary in the manufacturing of our products and in providing our services. We plan to reduce GHG emissions from energy and process chemical use through identifying conservation opportunities, auditing our management systems, setting targets, and reporting our progress to stakeholders. The most significant environmental reduction opportunity is 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. The per exabyte measure is inclusive of energy and carbon emissions internal to the organization with the exception of Scope 3 emissions.

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 is proud to have earned a B from the Carbon Disclosure Project (CDP) in the Water Security Disclosure 2022 and an A- in the Climate Change Disclosure 2022. It highlights our commitment to ensuring we continue to make positive progress and manage our climate change impacts. We are actively working towards reducing our GHG emissions and improving our TCFD disclosures.





## We Remain Committed to Our Science Based Targets

Seagate’s new environmental moonshot goals of reaching 100% renewable energy in our manufacturing and R&D sites by 2030 and reaching carbon neutrality by 2040 have superseded our previous Science Based Targets. These moonshot goals have been built upon our original commitment to our Science Based Targets, which we plan to update in the coming years to reflect our new environmental moonshots.

“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](#).”

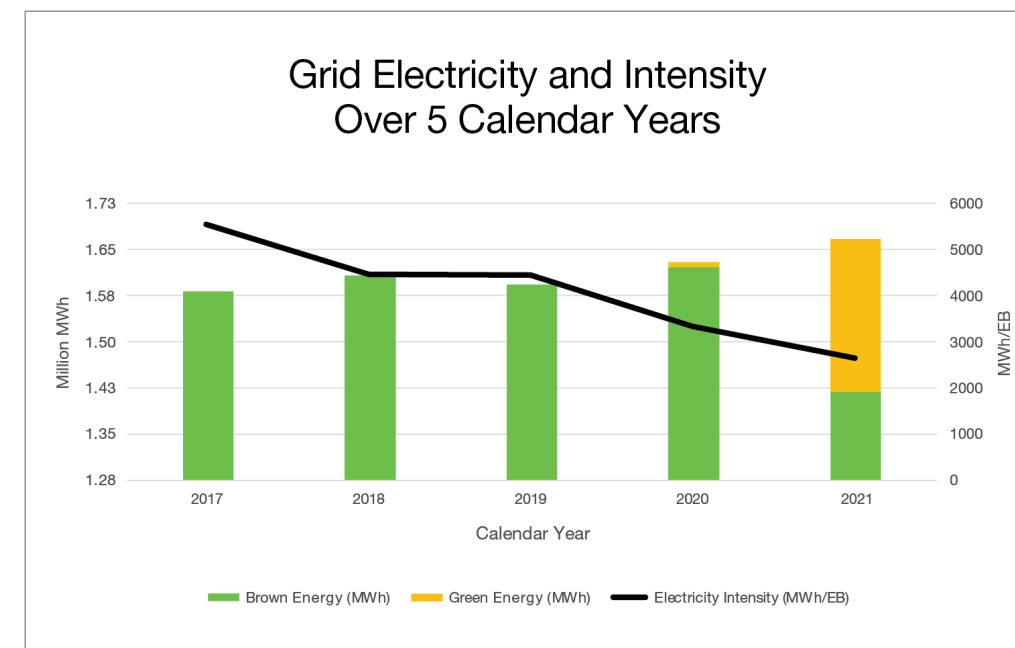
Scope 1 and 2 (market-based) GHG emissions decreased by 2.32% from CY2017 to CY2021. We remain committed to meeting our current Science Based Targets while working towards meeting our new moonshot goals. Our CY2017 baseline was adjusted in CY2020 with the latest emission factors and assumptions to reflect 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 purchased renewable energy starting with our Northern Ireland facility and progressing to renewable energy purchases in Thailand and China to mitigate Scope 2 emissions.



## Energy

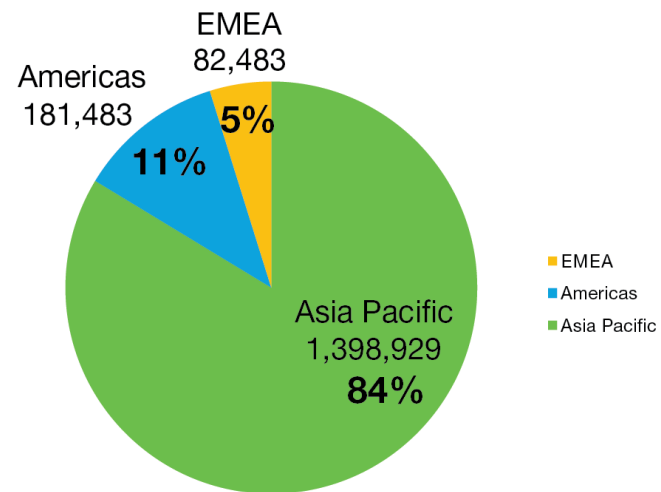
To meet the increasing demand for cloud-based storage solutions, Seagate continues to innovate and produce higher capacity drives. This requires more energy to manufacture our products. Normalizing our energy consumption per EB of shipped storage capacity helps guide our energy efficiency process and provide a standard to measure our progress. In FY2022, Seagate reduced the amount of energy consumed per EB shipped by 20% and the downward trend is expected to continue.



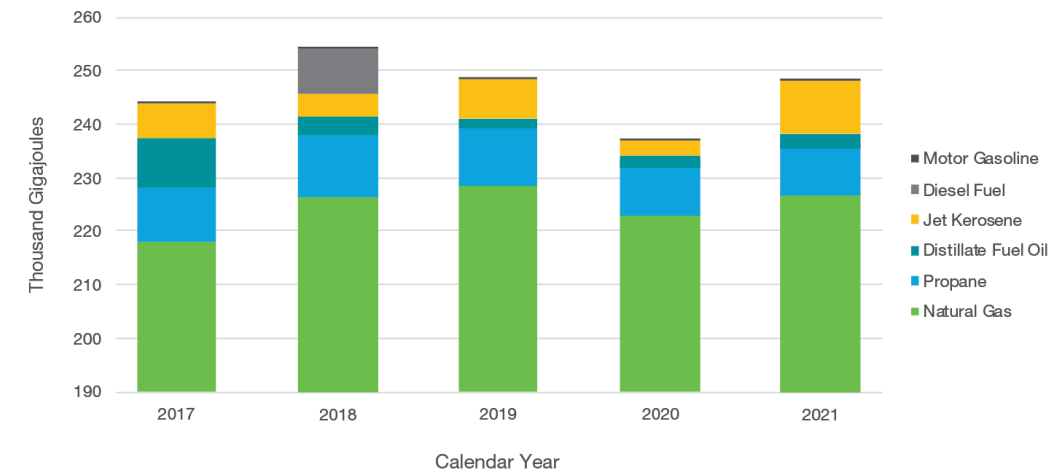
Seagate shipped 614.2 EB of storage capacity in CY2021, resulting in a total of 2,828 MWh per EB of storage capacity shipped, compared to 3,535 MWh in CY2020. The reduction in electricity consumption is 20%.



Electricity Consumed Internally by Region in CY2021 (MWh)



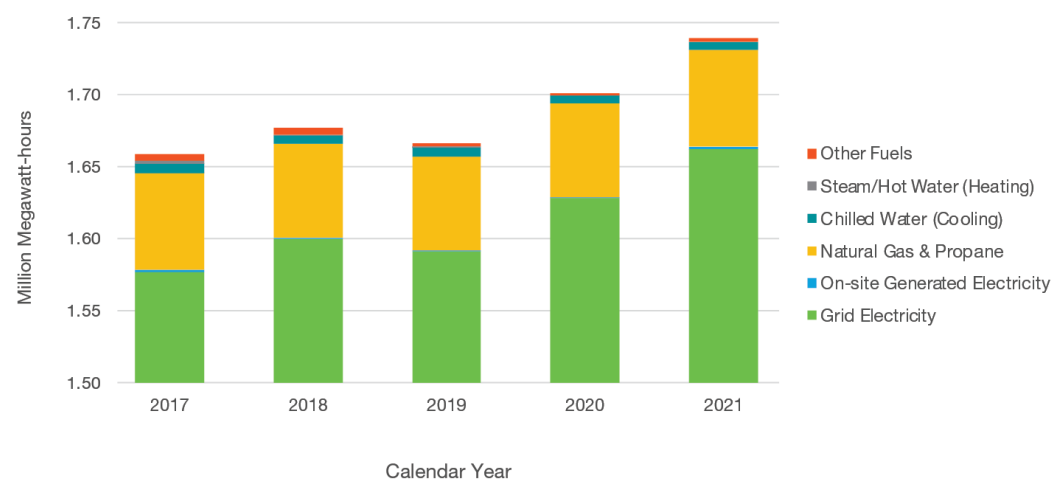
Total Fuel Consumption from Non-Renewable Sources (GJ) Over 5 Calendar Years



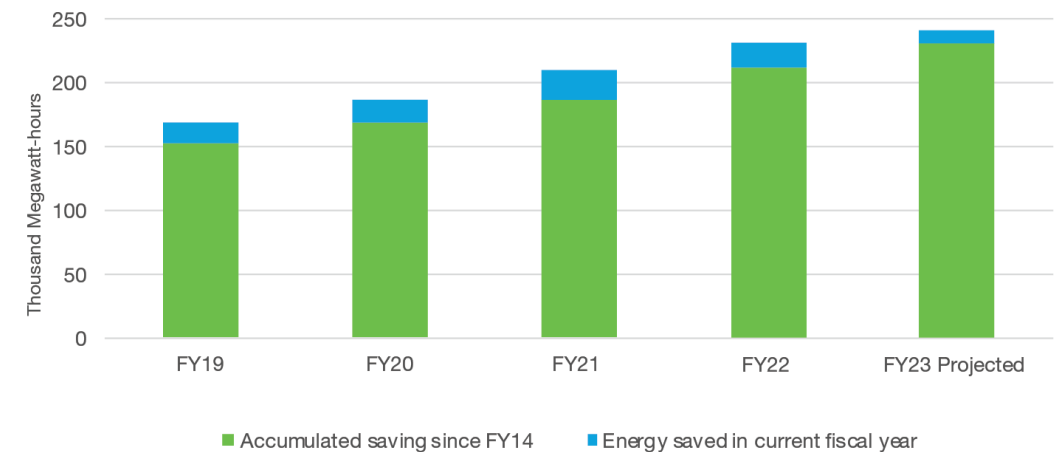
Total fuel consumed from non-renewable sources 248K GJ.

Reduction of Energy Consumption

Total Energy Consumed Internally (MWh) Over 5 Calendar Years



Accumulated Electricity Conserved Over 5 Fiscal Years (MWh)





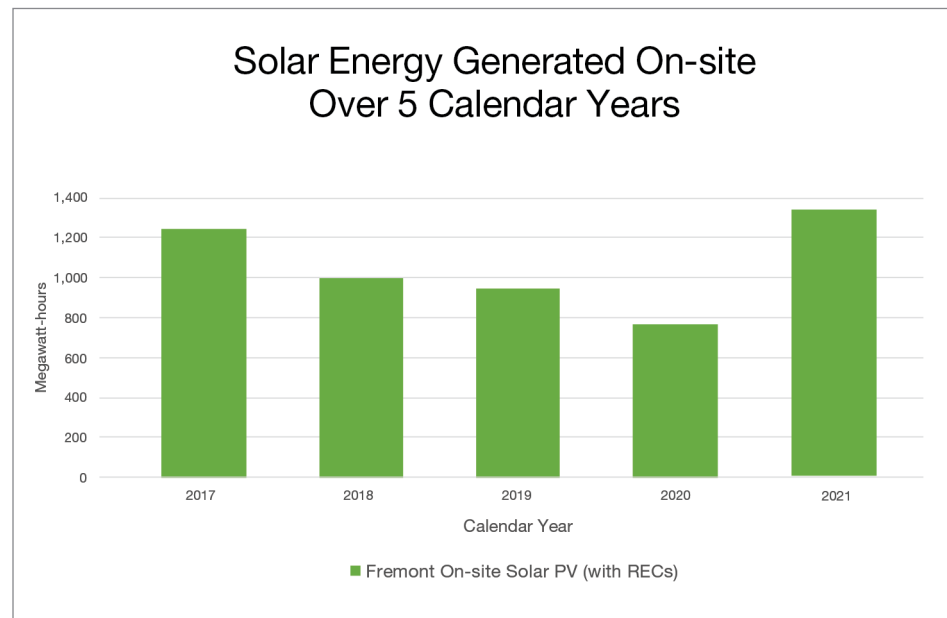
Energy conservation continues to be a priority area of focus for Seagate. In FY2022, we saved approximately 21,000 MWh, amounting to a Scope 2 reduction 11,000 tCO<sub>2</sub>e of electricity through energy conservation and efficiency initiatives. This exceeded our conservation goal of 10,000 MWh for 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 231,000 MWh from FY2014-FY2022. We maintain conservation goals and have set a target of 10,000 MWh for FY2023. For more information on our energy consumption refer to [Seagate's CDP Climate Change Disclosure](#).

### Renewable Energy

In FY2022, Seagate announced our moonshot goal of powering our R&D and manufacturing sites with 100% renewable energy by 2030. We are actively implementing a company-wide renewable energy strategy focused on reducing GHG emissions from electricity use, utilizing both on-site energy generation and renewable energy purchases.

Our Fremont, California design center generated 1,352 MWh of solar energy in CY2021 from a one-megawatt photovoltaic (solar) system. The total amount generated and associated environmental attributes are retained by Seagate. At our Springtown, Northern Ireland site, we maintained a renewable energy-purchasing contract established in FY2020, enabling the site to source 100% of its electricity from renewable sources. This contract accounts for 5% of the electricity Seagate purchases globally. In Teparuk, Thailand, Seagate has implemented a new one-megawatt peak (MWp) photovoltaic (solar) system. In addition, renewable energy purchase has been expanded to cover our sites in Teparuk and Korat, Thailand and Wuxi, China. The renewable energy resulting from our photovoltaic systems and renewable energy purchases account for over 50% of Seagate's total energy consumption.

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. In CY2021, the site team made advancements in understanding the system resulting in improvements and increased energy production.



### Carbon Emissions

Seagate conducts our carbon inventory on a calendar year basis, providing a more accurate representation of our emissions. Seagate's baseline year is CY2017, the first year we had complete Scope 1, 2, and 3 data and when Seagate set Science Based Targets. We share our factory performance results with our stakeholders annually in our Sustainable Datasphere: FY2022 ESG Performance Report, public disclosures, including filings with the SEC, 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](#)
- [FY2022 Proxy Statement](#)

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. In FY2022, Seagate incorporated climate change risk as a part of our enterprise risk management (ERM) process. Through the ERM process, climate change risk mitigation actions are incorporated into our overall business strategy. See our 2022 CDP climate change disclosure for further details on risks and opportunities.





## We Remain Committed to Our Science Based Targets

### Scope 1, 2 and 3 Emissions Results

| SCOPE  | CY2021                           | CY2020*                          | CY2019*                          | CHANGE        | REASONS FOR CHANGE   |
|--|----------------------------------|----------------------------------|----------------------------------|---------------|--|
| <b>Scope 1 Emissions:</b> GHG emissions generated directly at our sites  | 355,206 metric tons of CO2e      | 309,996 metric tons of CO2e      | 281,786 metric tons of CO2e      | 14% increase  | Additional hydrofluorocarbons consumption in the process driven by volume increase   |
| <b>Scope 2 Location-Based Emissions:</b> GHG emissions generated from the electricity that we purchase                           | 871,685 metric tons of CO2e      | 856,969 metric tons of CO2e      | 845,939 metric tons of CO2e      | 1.7% increase | No significant change (<5%)  |
| <b>Scope 2 Market-Based Emissions:</b> GHG emissions generated from the electricity that we purchase                             | 749,492 metric tons of CO2e      | 862,592 metric tons of CO2e      | 858,057 metric tons of CO2e      | 13% decrease  | Offset by REC retired to Seagate   |
| <b>Scope 3 Emissions:</b> Indirect GHG emissions that occur in our value chain, including both upstream and downstream emissions | 11,056,100 metric tons of CO2e   | 10,208,500 metric tons of CO2e   | 9,296,900 metric tons of CO2e    | 8% increase   | More storage capacity utilized during product use phase  |
| <b>Emissions Intensity:</b> Total Scope 1 and 2 market-based emissions per storage capacity shipped                              | 1,799 metric tons of CO2e per EB | 2,439 metric tons of CO2e per EB | 3,111 metric tons of CO2e per EB | 26% decrease  | Storage capacities shipped to market grew over the years. Intensity total vs. 2017: total GHG emissions intensity reduced 54% compared to base year. |

\* Adjusted historical emissions in response to structural and/or methodological changes.

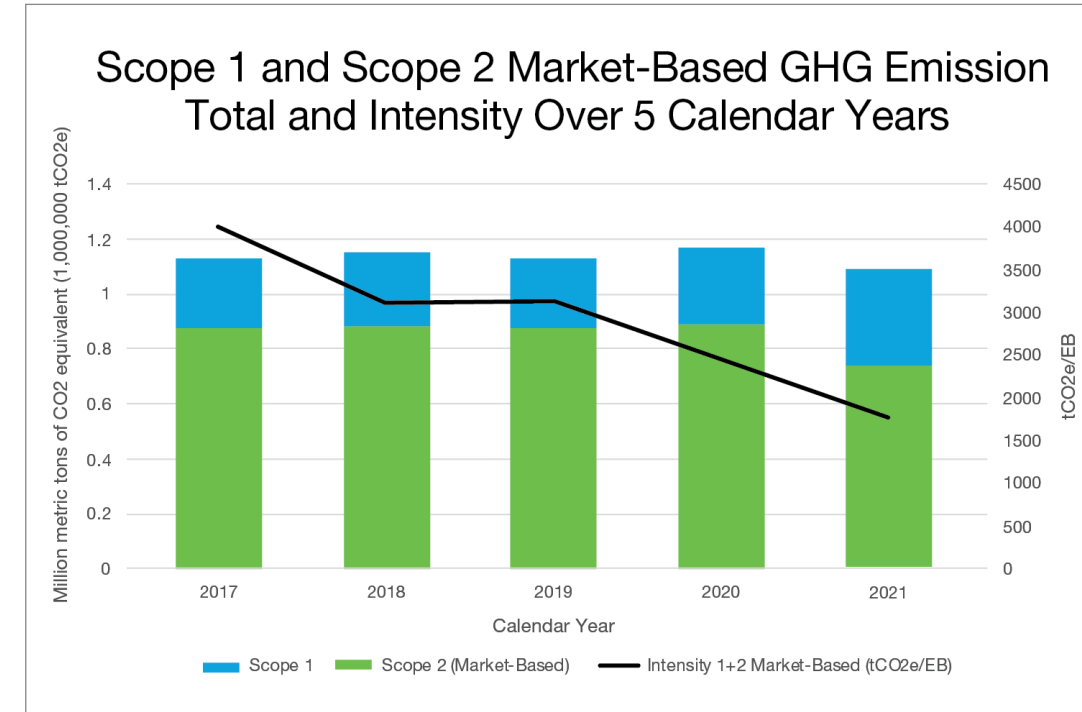
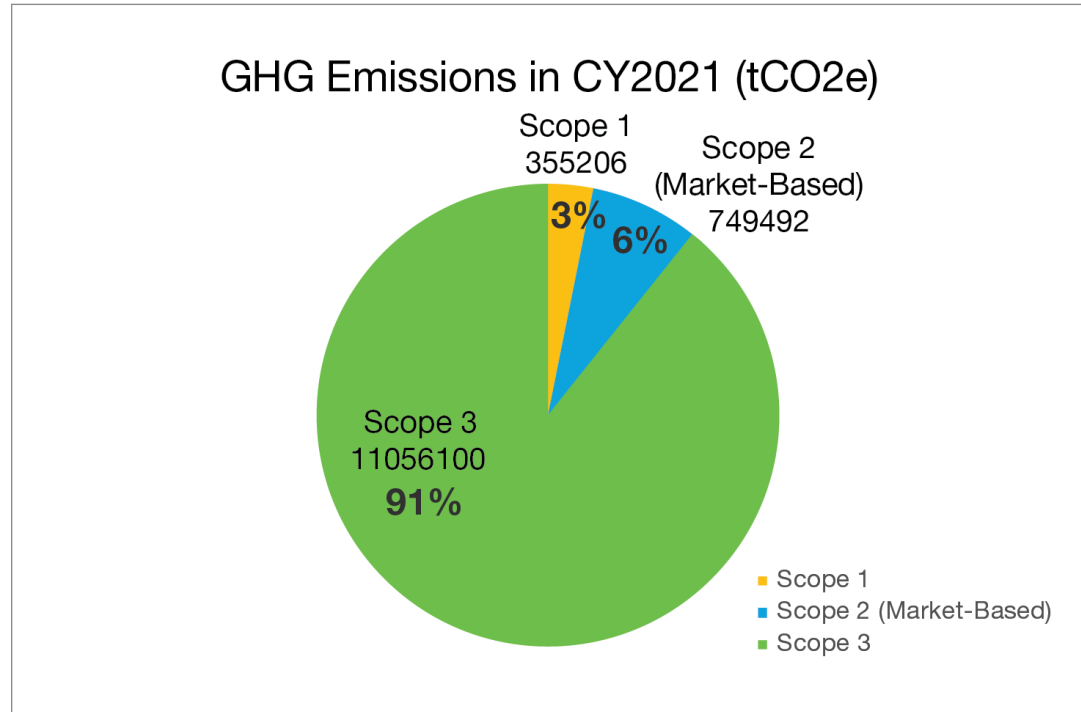
Seagate adopts The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) to collect activity data and calculate emissions using an operational control approach. The emission data are reported for Scope 1 and Scope 2 as per the World Resources Institute (WRI)/World Business 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) and compares amount of heat trapped by a given mass of a GHG to amount of heat trapped by similar mass of CO2. Other emission factors used included U.S. EPA Emission Factor Hub, April 2022 (fuels), U.S. EPA Waste Reduction Model (WARM) Version 15, November 2020 Update, U.S. EPA EEIO Factors, Supply Chain GHG Emission Factors (Categories 1 and 2) UK Defra 2021 (air travel). Emission factors for electricity used are referred to eGRID 2020, February 2022 (US), IEA 2011 (International), AIB (European Residual Mix Factors) and Country- and supplier-specific factors.

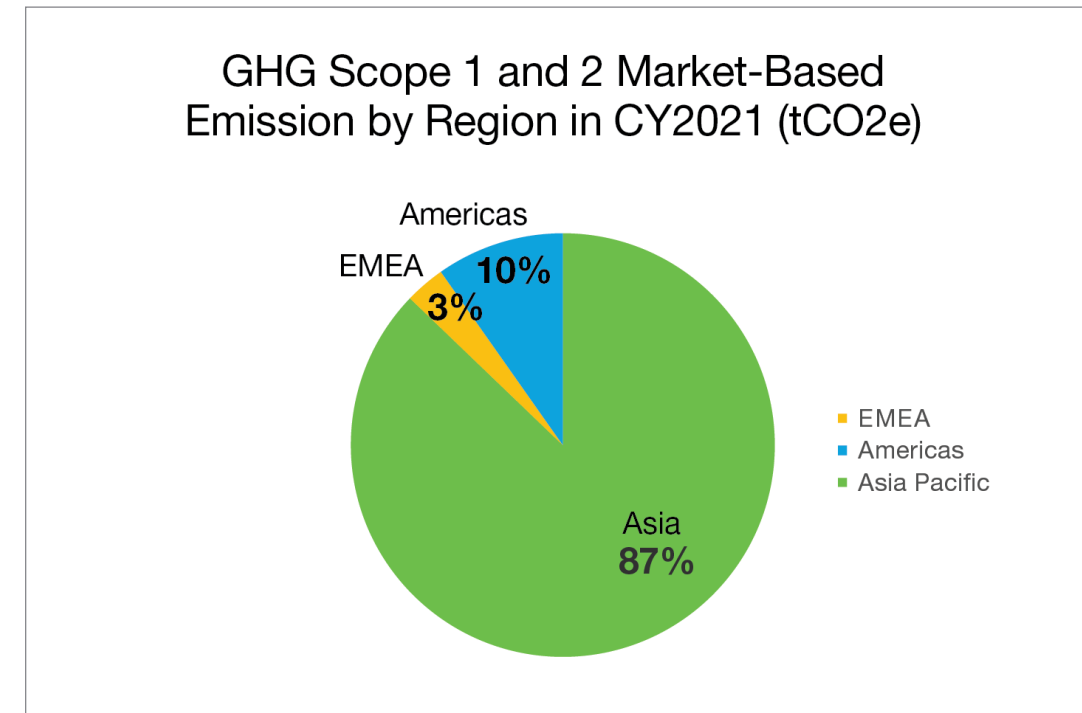
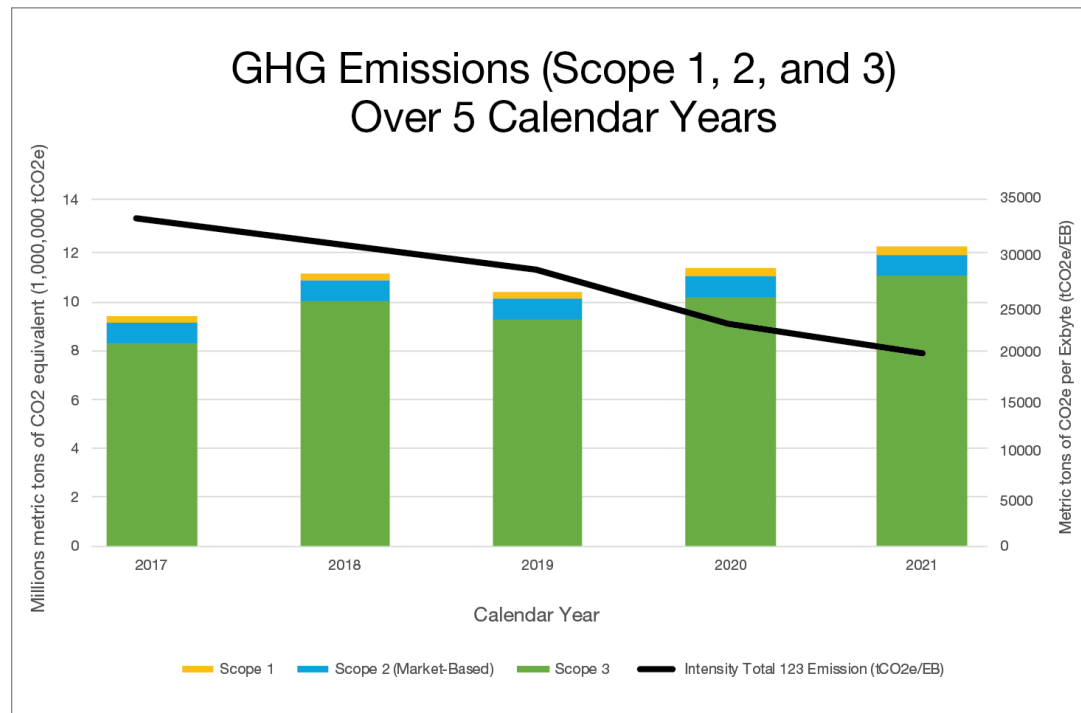
We also conduct third-party verification of our GHG emissions reporting, which is done every calendar year per ISO 14064-3: Greenhouse gases—Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions.



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.

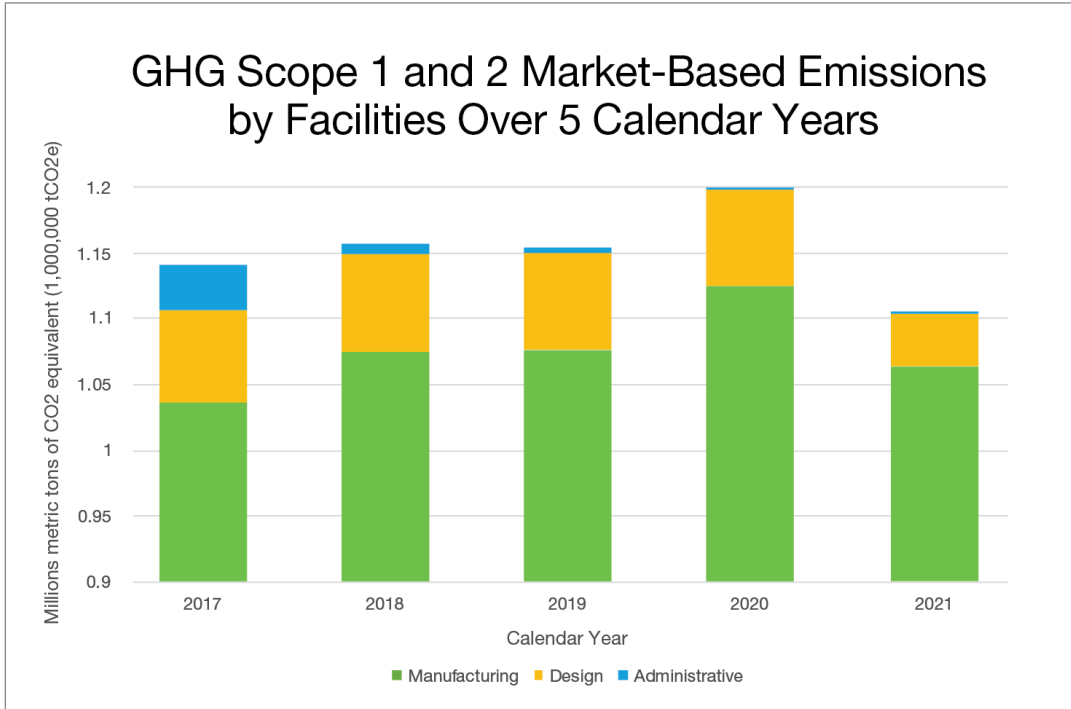


Measuring emissions normalized over EBs shipped is a more accurate representation of the emissions portfolio of our business as compared to data being normalized to number of drives shipped.

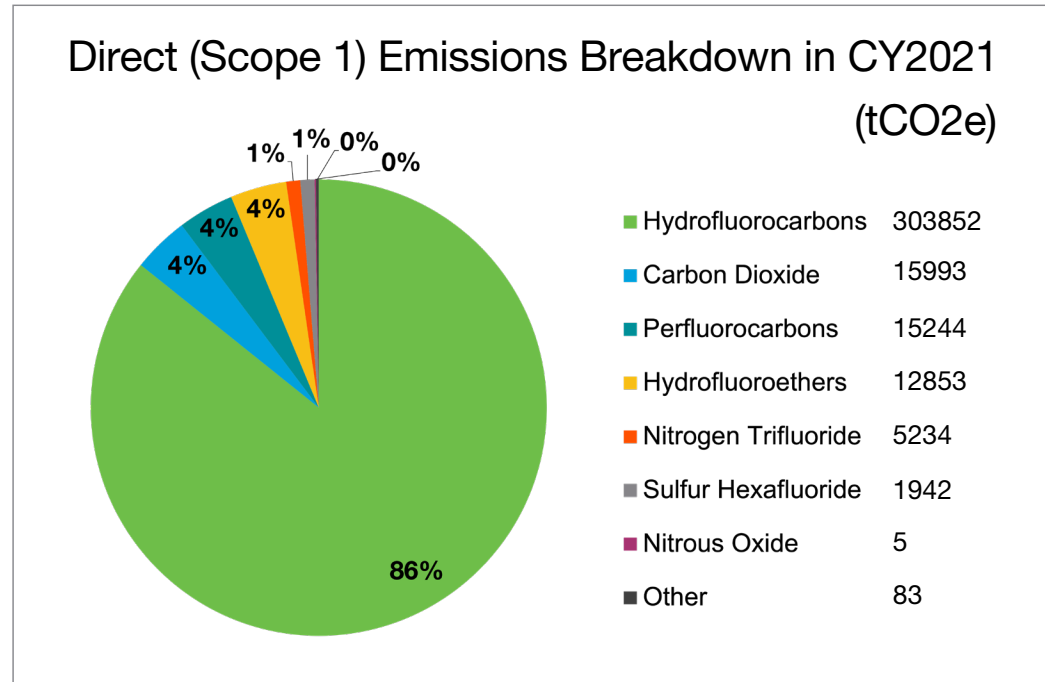




Seagate continues to face fugitive emissions challenges with the use of a hydrofluorocarbon solvent that has high global warming potential. This solvent is a necessary part of our media manufacturing process which we deploy in a closed-loop system with on-site recovery to minimize fugitive emissions.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



The hydrofluorocarbon solvent used in our head and media manufacturing process contributed 86% of the Scope 1 emissions totals in CY2021.



## 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 purchased goods and services. 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.



## CY2021 GHG Total Emissions

Scope 3 Upstream = 2,308

Purchased Goods and Services = 1,900

Capital Goods = 90

Fuel and Energy Related Activities = 200

Upstream Transportation and Distribution = 70

Employee Commuting = 36

Business Travel = 0.5

Waste Generated = 9.3

Upstream Leased Assets = 1.8

Scope 2 Market-Based = 749

Purchased Electricity = 747

Purchased Cooling = 2

On-Site Generation = 0.1

Scope 1 = 355

Process/Fugitive = 342

Stationary Combustion = 12

Mobile Combustion = 0.7

Scope 3 Downstream = 8,749

Use of Sold Products = 8,700

End of Life Treatment for Sold Products = 40

Downstream Transportation and Distribution = 6

Processing of Sold Products = 2.5

CY2021 GHG Total Emissions Scope 1, 2, and 3 Listed in Thousand Metric Tons CO2e



## CY2021 Emissions of Ozone Depleting Substances and Nitrogen Oxides, Sulfur Oxides, and Other Significant Air Emissions

In CY2021, quantity of production, imports, and exports of ozone depleting substances (ODS) was zero metric tons of CFC-11 equivalent. This data is 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 approximately 31 mg/Nm<sup>3</sup> SO<sub>x</sub>, 11,128 mg/Nm<sup>3</sup> volatile organic compounds (VOC), and 320 mg/Nm<sup>3</sup> particulate matter (PM). We estimate 1.4 U.S. tons of combined hazardous air pollutants (HAP) are emitted annually. Emissions factors are sourced from the EPA's ODS page. Air monitoring complied with local regulatory standards and guidelines.

### 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. We use these programs to categorize different waste streams and properly dispose of waste in accordance with regulatory requirements. Our waste reduction initiatives strive to reduce environmental impact by first preventing waste from being produced, and then moving to recycling or reusing waste where possible.

All waste generated by Seagate is disposed of off-site.

### Two Main Types of Waste

#### Non-Hazardous Waste:

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

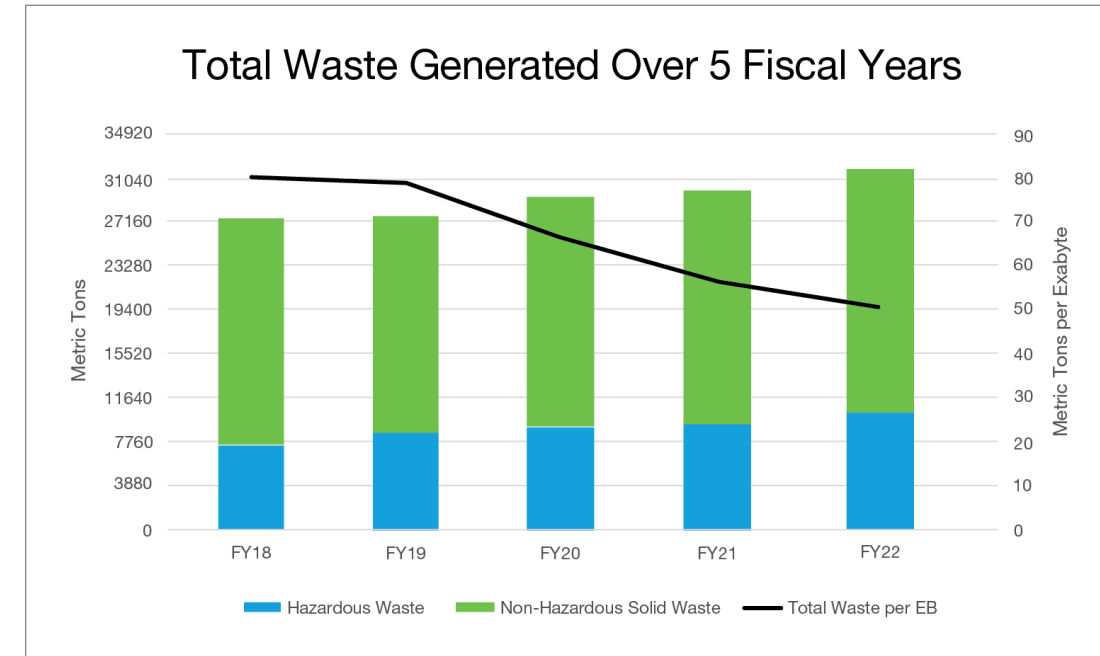


#### Hazardous Waste:

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



Each Seagate site reports data on waste to a central database, which is accessible by relevant site and corporate personnel and reviewed by Seagate's 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 FY2022.

### Non-Hazardous Waste

We measure the performance of our program by tracking the waste types listed in the graph that follows. 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.



#### FY2022 Target

A diversion rate for our non-hazardous waste of 88% or above



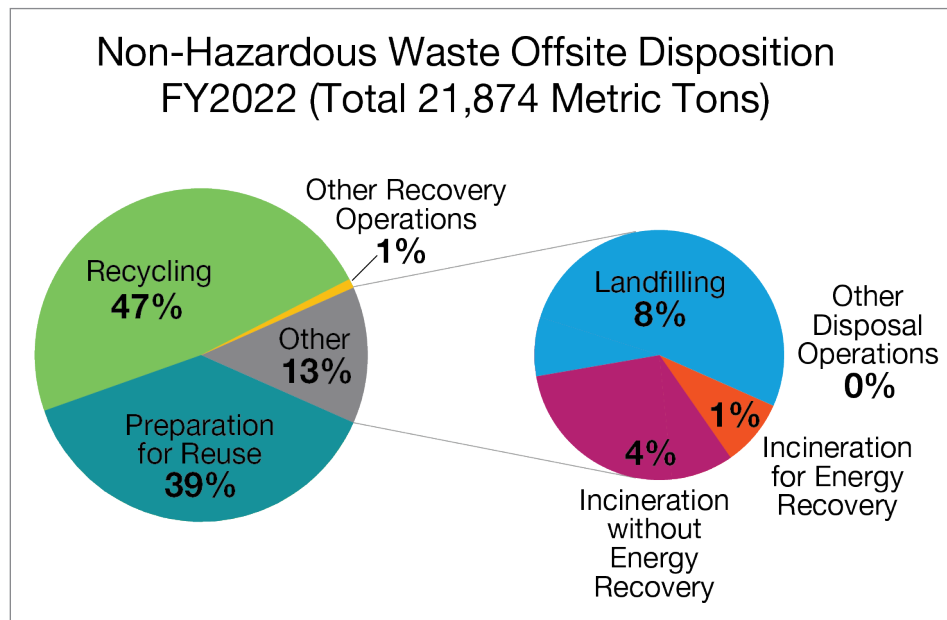
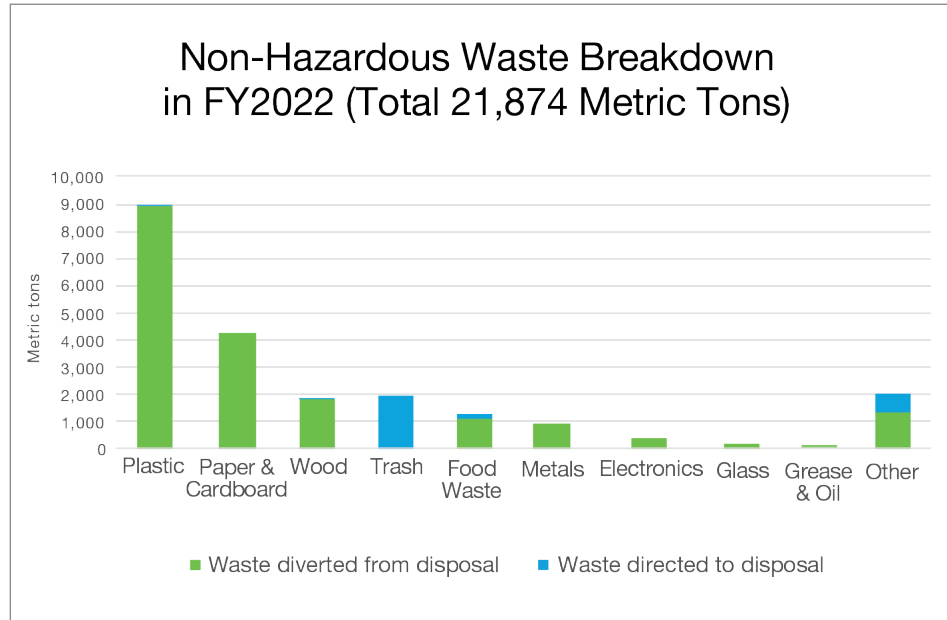
#### FY2022 Results

87% diverted

Generated 6.6% more non-hazardous waste in FY2022 (at 21,874 metric tons), compared to 20,517 metric tons in FY2021.

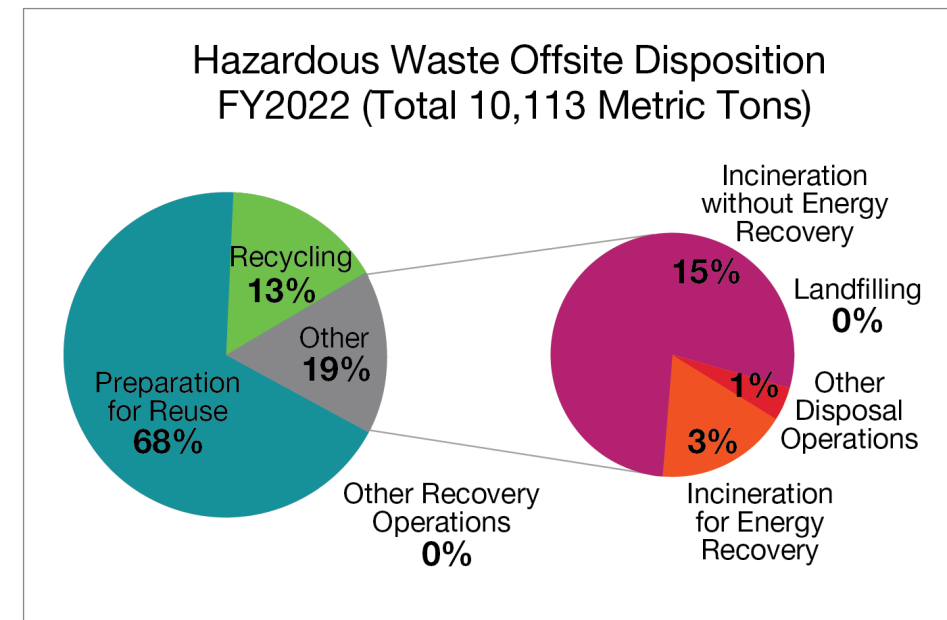
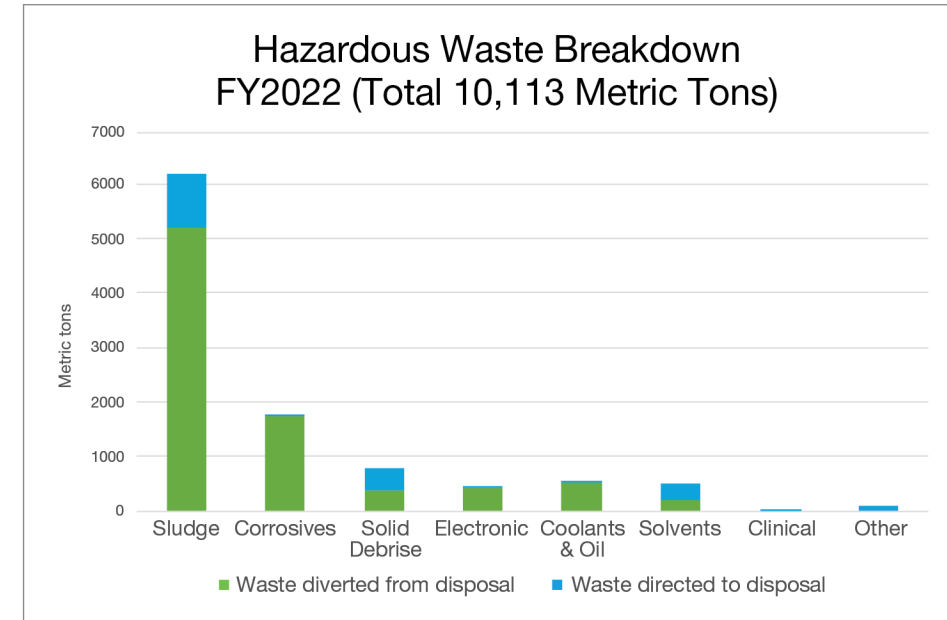


### Non-Hazardous Waste



### Hazardous Waste

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 FY2022, we conducted or reviewed twelve hazardous waste TSDF audit reports to ensure these facilities meet the standards set by Seagate corporate sustainability. A total of 10,113 metric tons of hazardous waste was transported to in-country TSDFs for treatment in FY2022. No waste was imported or exported during the fiscal year. The volume of waste transported is calculated from hazardous waste consignment notes that accompany the shipment for treatment and are validated by the TSDF.



### Zero Landfill Disposal of Hazardous Waste

Seagate has committed to zero landfill disposal of hazardous waste unless technically infeasible. In the case of disposal, we work with the disposal facility to identify the most appropriate method for treatment and disposal. Seagate's 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 FY2022, no hazardous waste was sent to landfills.

Seagate continues to use recycling as the main method of disposal for hazardous waste. In FY2022, 81.6% of our hazardous waste was diverted from disposal and 3% of what was directed to disposal was done so with energy recovery.

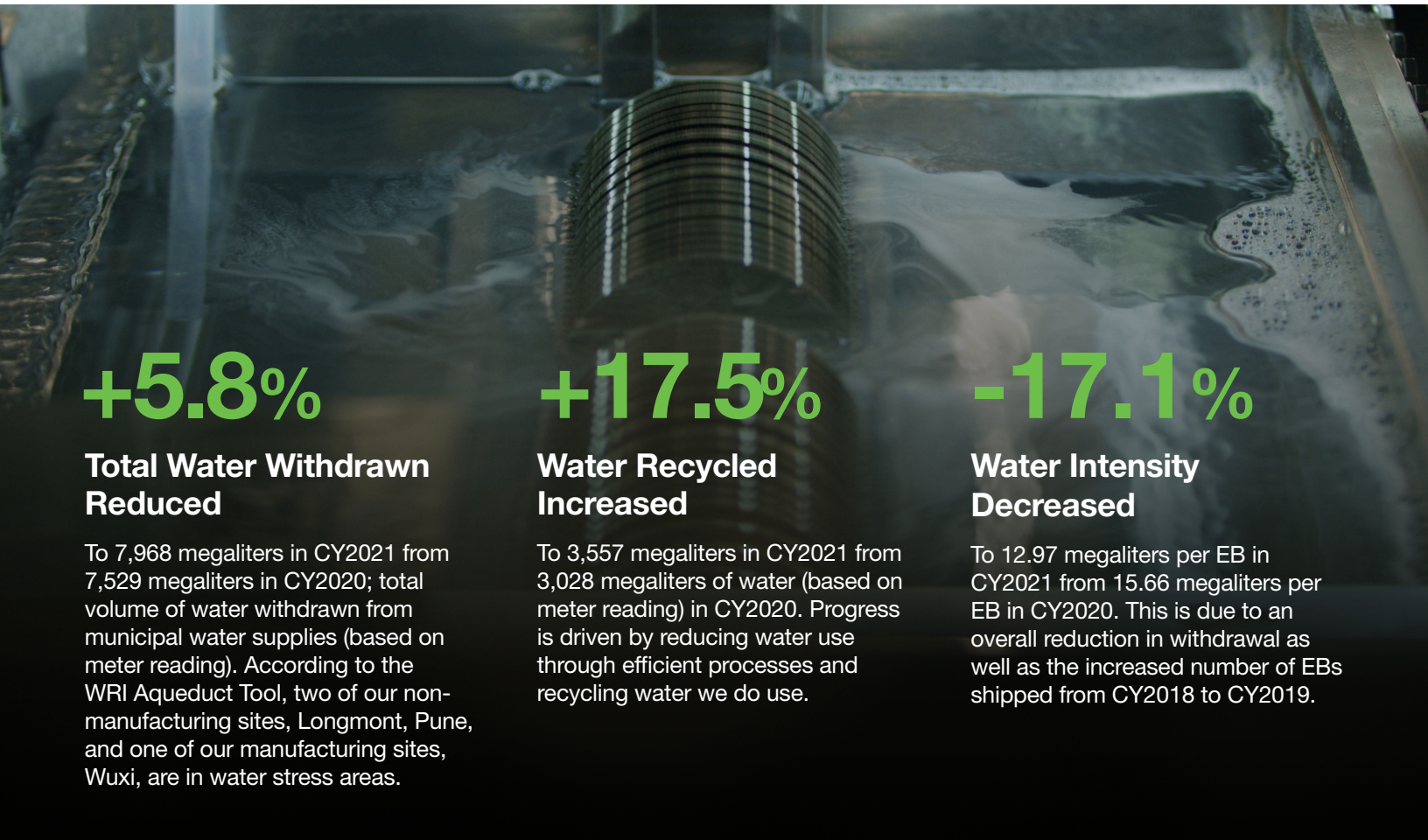


## Water Stewardship

Responsible management of water, a critical natural resource, is crucial to preserve and protect our planet. Our manufacturing processes use freshwater sourced from local watersheds shared with the local community. Freshwater is primarily used in direct operations and 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 and then used for other purposes, such as transportation and irrigation. This makes the proper treatment of water an important aspect of our operations to reduce the impact on 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. Please see our [2022 CDP Water Security Response](#) and [Third Party Water Disclosure Verification](#) for further information.



**+5.8%**

**Total Water Withdrawn Reduced**

To 7,968 megaliters in CY2021 from 7,529 megaliters in CY2020; total volume of water withdrawn from municipal water supplies (based on meter reading). According to the WRI Aqueduct Tool, two of our non-manufacturing sites, Longmont, Pune, and one of our manufacturing sites, Wuxi, are in water stress areas.

**+17.5%**

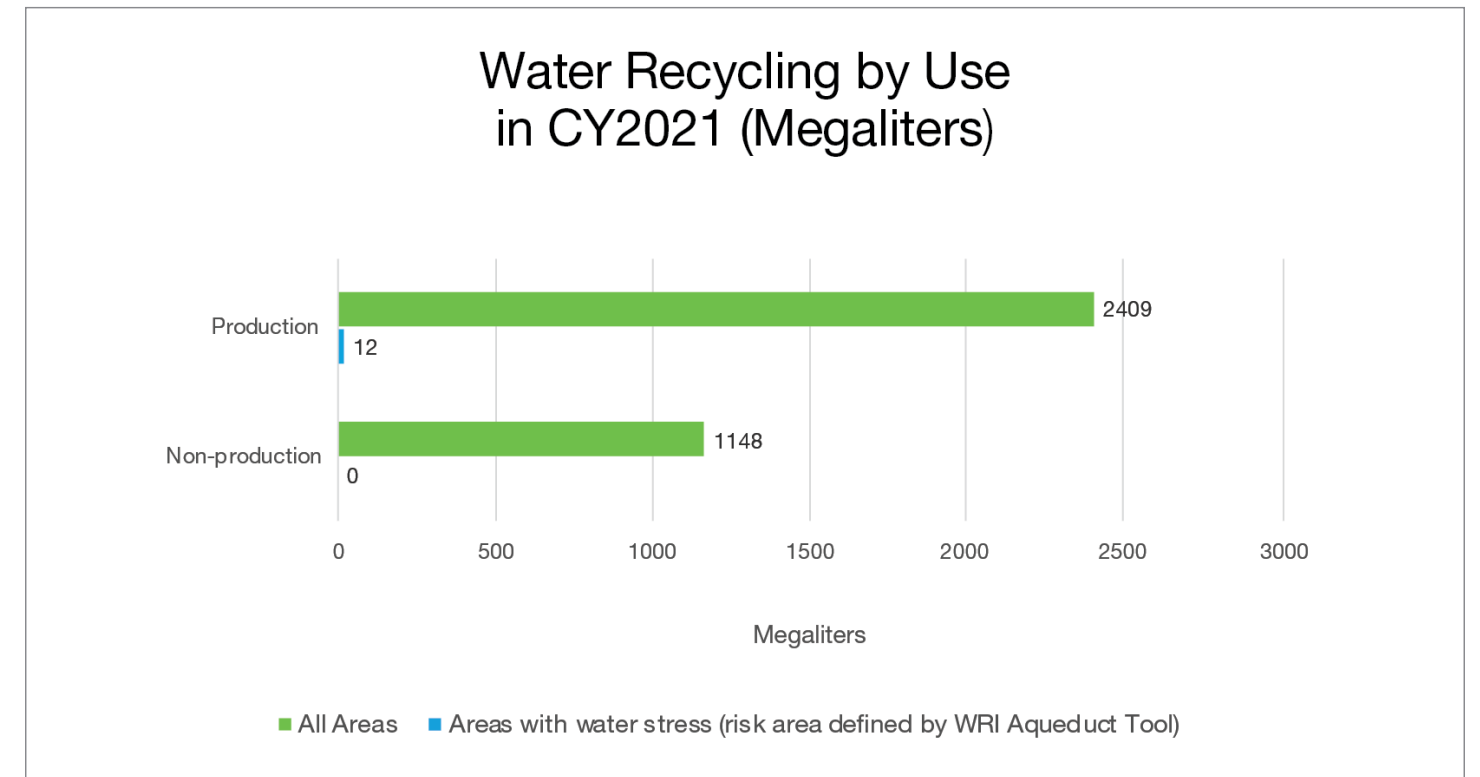
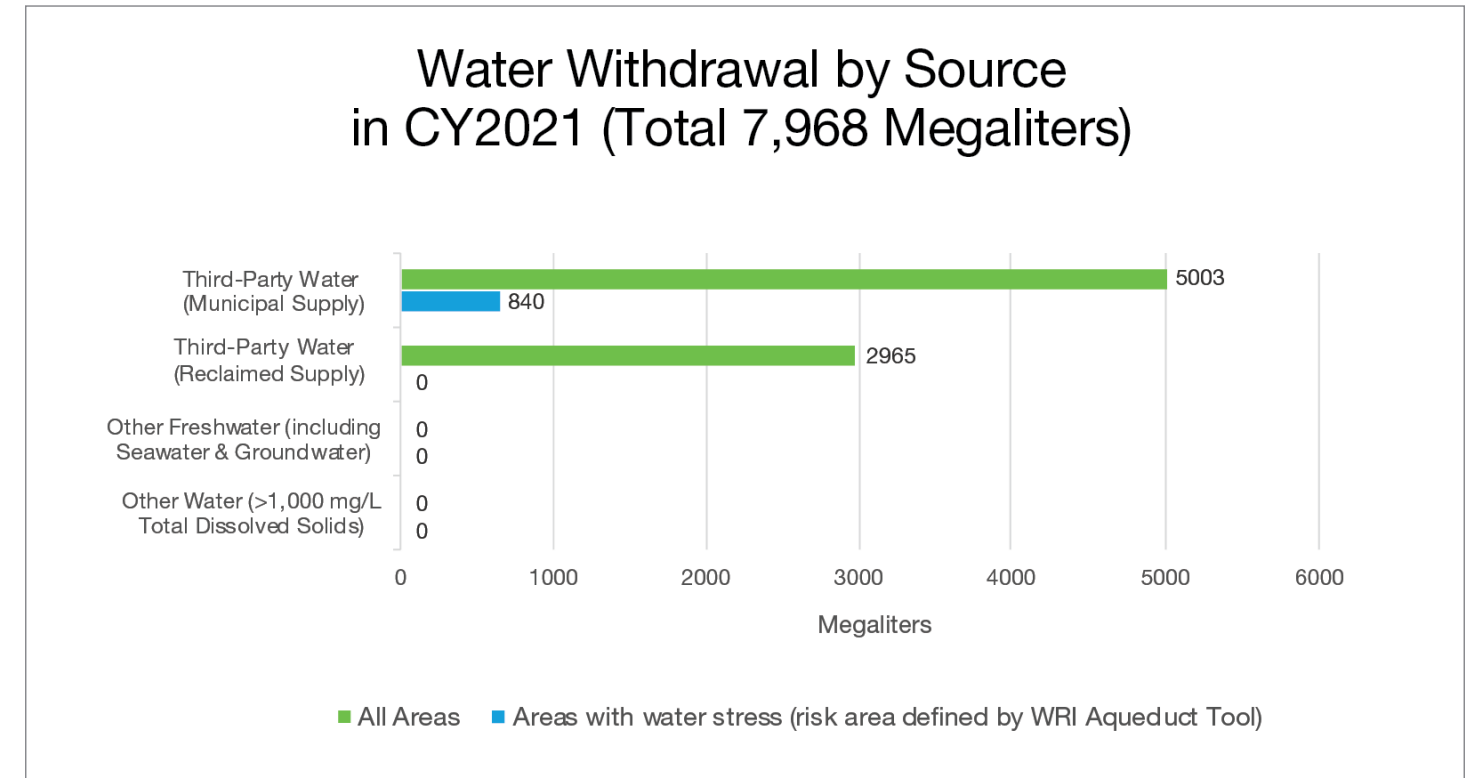
**Water Recycled Increased**

To 3,557 megaliters in CY2021 from 3,028 megaliters of water (based on meter reading) in CY2020. Progress is driven by reducing water use through efficient processes and recycling water we do use.

**-17.1%**

**Water Intensity Decreased**

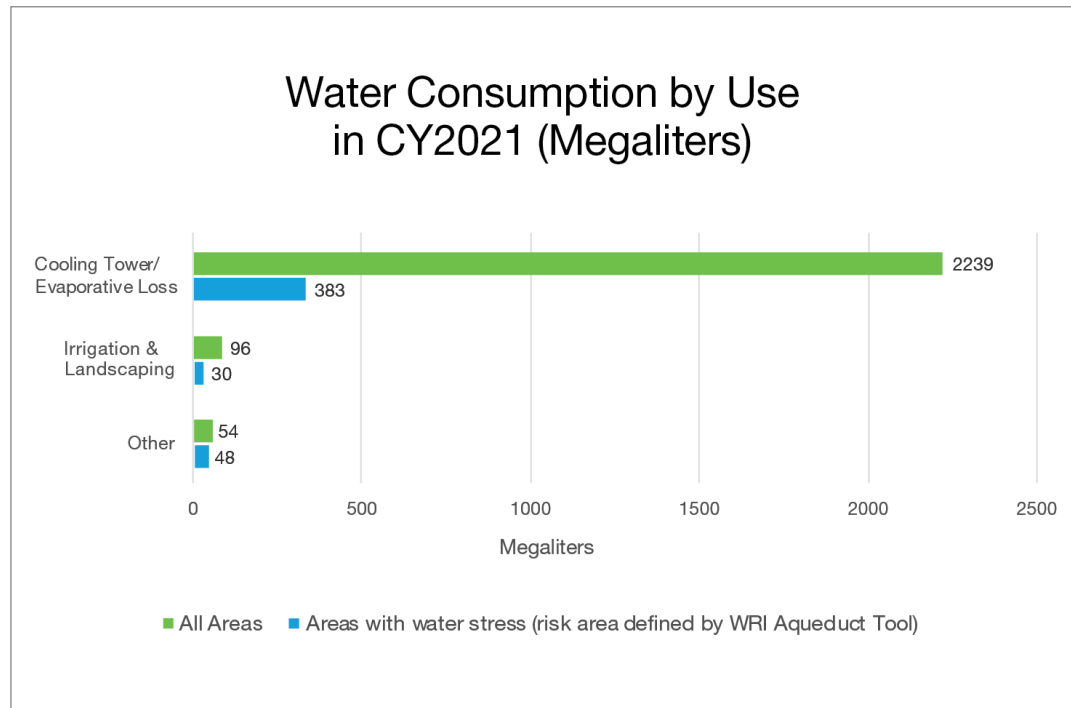
To 12.97 megaliters per EB in CY2021 from 15.66 megaliters per EB in CY2020. This is due to an overall reduction in withdrawal as well as the increased number of EBs shipped from CY2018 to CY2019.



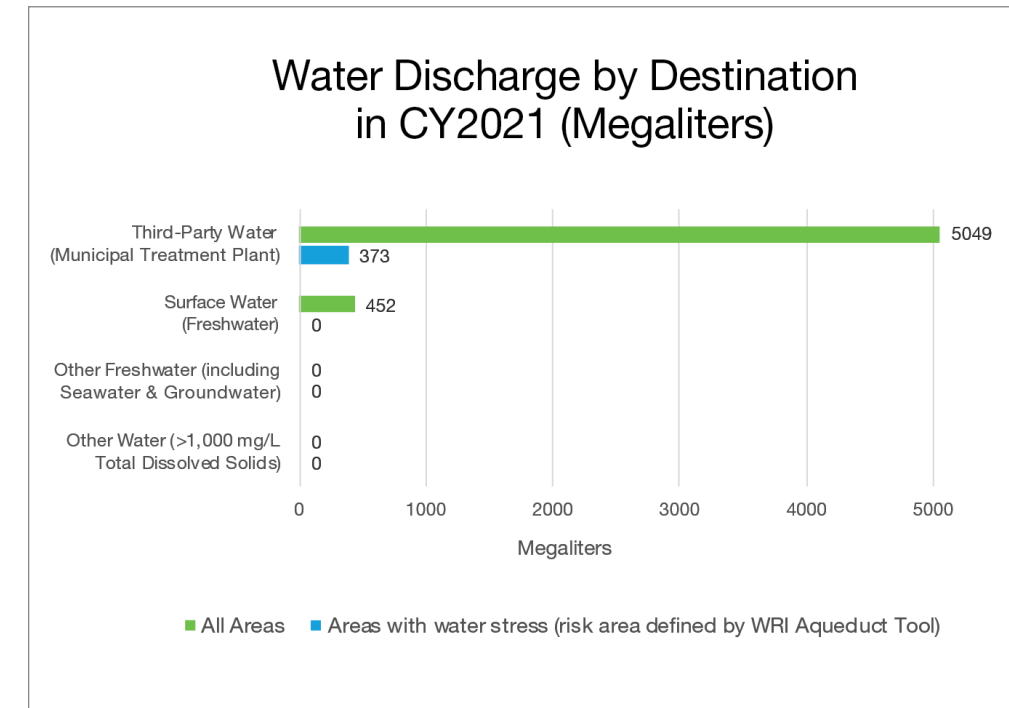




In CY2021, roughly 94% of Seagate’s water was used for cooling sites and critical equipment. The Senior Vice President of Sustainability and Transformation reviews water performance quarterly in alignment with water metrics tracked for water reduction. We monitor use at our sites on an annual basis, and when actual data is not available, estimate use based on available data from other sites. Seagate prioritizes monitoring our sites that consume the most water, which are our manufacturing sites and our largest R&D and administrative sites. 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 disclosed information in our [2022 CDP Water Security Response](#).



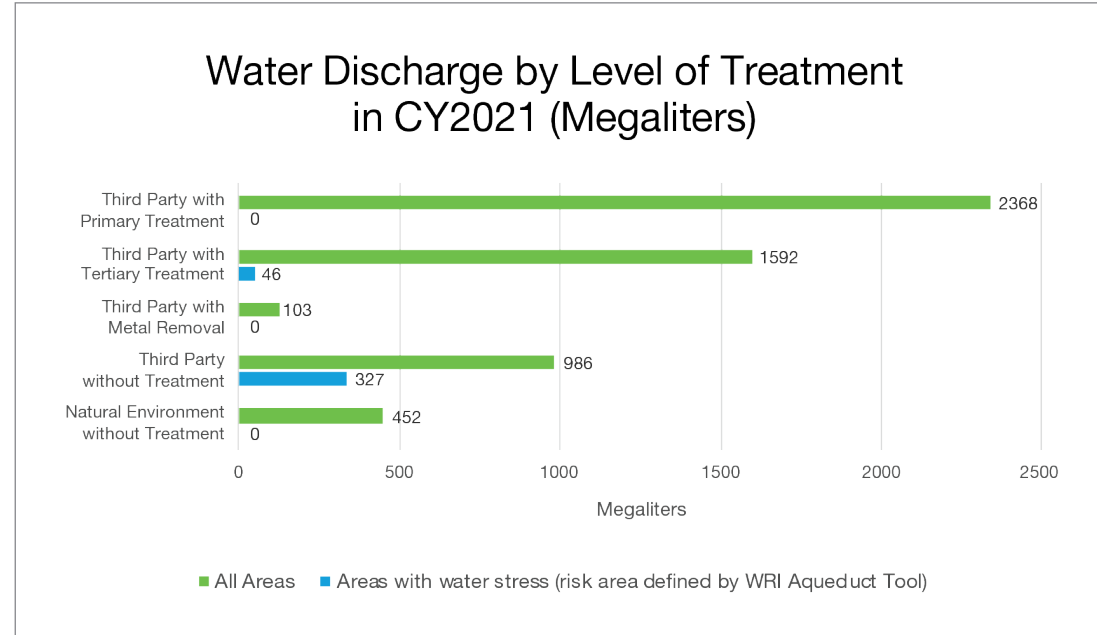
A critical aspect of our operations is the treatment and disposal of wastewater from our manufacturing processes. We follow local authorities’ minimum standards for the quality of effluent discharge in all operations locations. These standards include pH, biological oxygen demand, chemical oxygen demand, 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 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 to ensure a buffer exists to react to unforeseen circumstances while remaining in compliance with our operating permit.



Our water discharge monitoring plan takes into consideration process capabilities and legal requirements for our sites. We prioritize monitoring at 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.



The 452 megaliters 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 plans and set effluent discharge limits, taking into consideration the receiving bodies of water. These bodies of water are managed by the municipality and are connected to municipal water treatment sites. In FY2022, there was no non-conformance to discharge limits. Therefore, no corrective action was needed.





07

## Product Sustainability and Circularity

**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 framework materiality assessment. Our overarching goal for Seagate's product sustainability is to reduce the environmental impact of our products. This also enables Seagate to support our customers and suppliers to meet their own environmental objectives.

The sustainability team, and Seagate as a whole, recognize that we are accountable for the environmental impact of the products we



place on the market. The manufacturing of Seagate's products consumes chemicals and material from natural resources. This results in environmental impacts that our internal policies and procedures—which range from material restrictions to responsible sourcing of materials—are designed to mitigate. Our sustainability team works with internal and external partners to assess and reduce the effect our products have on the environment and conducts life cycle assessments (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, 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 [ESG page](#) of our website. Health and safety considerations are addressed at the design stage to meet regulatory and customer requirements.

One hundred percent of Seagate's products are assessed to meet regulatory requirements for health and safety in jurisdictions where we do business. In FY2022, 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 the Global Market Access Council, is chartered with ensuring all regulatory requirements for placing our products in the markets where we do business.



## Product Impacts

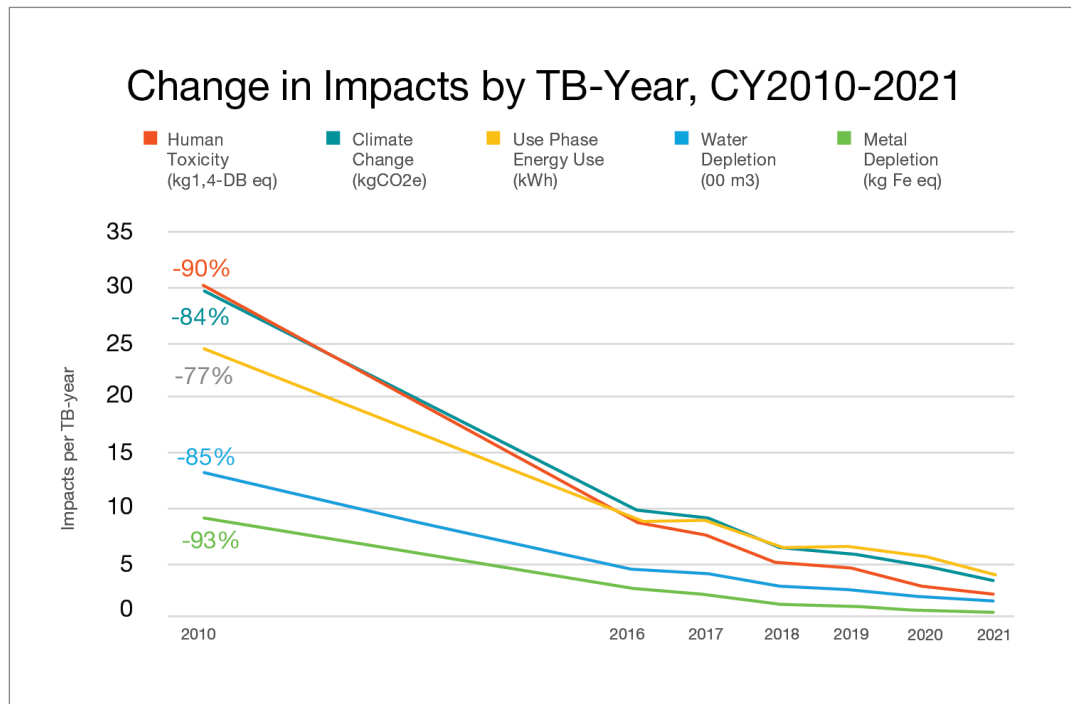
Our corporate sustainability organization maintains full material disclosures (FMD) from our suppliers for each part included in our products and we require our suppliers to refresh this annually. FMDs list the material that is in the component to determine how much energy, water, and material is used to produce the components, as well as 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, and each LCA is reviewed by an independent third party.

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 84% to 95% across impact types 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 CY2021

|  |   |
|--|---|
| <p><b>Climate Change (kg CO2e)</b><br/>Assessed across the seven GHGs specified in the GHG Protocol Product Standard</p> <p><b>-8%</b></p> | <p><b>Human Toxicity (kg 1.4-DB eq)</b><br/>Accounts for environmental persistence, accumulation in the human food chain, and human toxicological effects</p> <p><b>-8%</b></p> |
| <p><b>Metal Depletion (kg Fe eq)</b><br/>Indicates the amount of mineral deposits consumed</p> <p><b>-9%</b></p>                           | <p><b>Water Depletion (kg cubic meters)</b><br/>Reflects the amount of water withdrawn in cubic meters from local freshwater systems</p> <p><b>-8%</b></p>                      |

| Annual Product Sustainability Target         |   |                                   |
|--|---|-----------------------------------|
| Sustainability target                        | Reduction achieved across all indicators since CY2010 | Year over year reduction achieved |
| Per year against baseline on four indicators | Average reduction between CY2010 and CY2021           | Between CY2020 and CY2021         |
| <b>-5%</b>                                   | <b>-8% to -9%</b>                                     | <b>-22% to -31%</b>               |



Our reductions are driven by the increase in drive capacity and the increasing average lifespan of our products, demonstrating a move to higher capacity and increased longevity drives.

We prioritize product LCAs based on production volume and customer data requirements. We assess 100% 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, which are accessible to users online.

With our commitment to credibility and transparency, we maintain third-party assurance for the completion and reporting of LCA results. Customers' use of our products is responsible for 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 terabyte of storage capacity shipped on average for our product portfolio. The metal depletion indicator specifies the number 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% of our product is made from minerals; for CY2021, the average metal depletion per TB across Seagate's product portfolio was 1.90 kg Fe-Eq, and the total impact to metal depletion equates to approximately 1.17 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 [website](#), and cover our Enterprise HDD, Enterprise SSD and Consumer HDD products.



## Product Life Cycle Management

| 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 Electronic Product Environmental Assessment Tool (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 FY2022) |
| Weight of end-of-life products and e-waste recovered, percentage recycled   | Seagate launched a pilot take-back program** in Taiwan for our drives, which produced approximately three metric tons of end-of-life products and 57% of the material received was recycled               |

\* 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 continuously work 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 to reduce single-use plastics, we continue to work holistically to reduce packaging and recycle as much of our packing material as possible.

In FY2022, all core Seagate HDD products were shipped using certified sustainably sourced packaging, which constituted approximately 3,285 metric tons of paper material. As of CY2021, all packaging for Seagate's consumer solutions group products is made from 100% recycled plastic, which is also 100% recyclable. All paper boxes (except retail boxes) are manufactured with 100% recycled materials. Currently, the retail box color scheme requirements prevent it from being sourced from recycled materials. In addition, in CY2021, we changed our packaging foam and adhesive usage. Previously, we used electrostatic discharge (ESD) pink foam to protect our products in their packaging. We are now using non-ESD white foam to protect our products because it is more easily recyclable. We have also reduced the use of adhesive in non-necessary contexts to further ease recycling.

## 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 their businesses and global wellbeing. This is driven in part by growing recognition of dwindling finite resources and increasing concerns regarding materials availability and access. Seagate is committed to innovating in materials efficiency and circularity—both internally and with our external stakeholders and peers.

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

The circular economy will affect the evolution of business models as well, shifting from the current 'take-make-waste' model to services that extend 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, Seagate provides information to enable our customers' reclamation efforts and encourage participation in manufacturer take-back programs.

Seagate has several innovative business processes in place to minimize environmental waste caused by our drives and servers. We receive warranty-returned drives, buy back products from customers, and refurbish and resell useful drives, thereby extending their useful life. In FY2022, Seagate extended the life of over 1.16 million HDDs and SSDs. The drives were recovered and placed back into the market, avoiding over 540 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.

\*Assuming each drive is an average weight of 465g

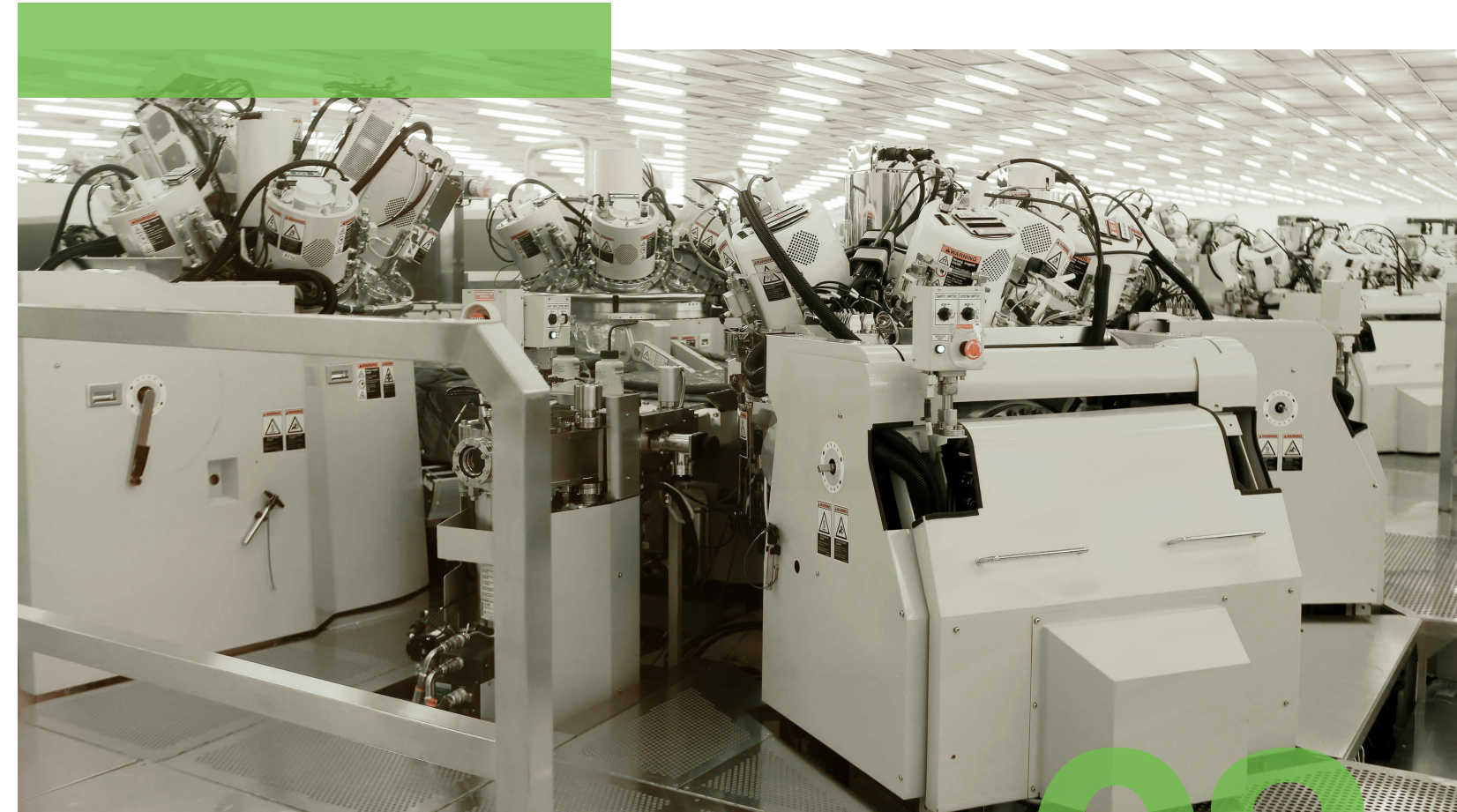
### Circular Drive Initiative

In FY2022, Seagate helped found the Circular Drive Initiative (CDI). This collaboration with global leaders in digital storage, sustainability, and blockchain focuses on reducing e-waste by promoting and enabling the secure reuse of storage hardware. Seagate's self-encrypting drives and instant secure erase (ISE) capabilities are enabling achievement of this mission as well as Seagate's sustainability goals. Once data is digitally wiped through ISE, drives can be redeployed into the market to avoid becoming harmful e-waste.





**Circular Production Model**



# 08

## Restricted Substances

### Chemicals and Restricted Substances

Restricted substances have a negative impact on human health and the environment, especially at the product's 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 meet product environmental requirements.

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 number for each chemical substance present in Seagate components and products is cataloged in the system as well. The information from the CAS database is used to respond to customer product environmental compliance inquiries. In FY2022, we received and responded to approximately 3,300 requests for data and compliance documentation. This is an approximately 25% decrease in quantity of requests compared to FY2021. This decrease in quantity of requests can be compared to an almost 400% increase in average hours required to fulfill a request since FY2020, showing the ever-growing complexity of fulfilling product environmental compliance requirements.

### FY2022 Circularity Program Indicators



**Extending Product Life**

- 1.16 million HDDs and SSDs
- HDDs: 1,092,745  
 SSDs: 70,611  
 Total: 1,163,356



**Material Recycling**

- Scrap Aluminum: 64.8 metric tons
- Scrap Magnets: 0.93 metric tons



## FY2022 CAS Database Updates

(Made with Supplier Full Material Disclosures and Conflict Minerals Data)



Seagate is committed to compliance, and we are subject to the following requirements where we adhere to global restricted substance legislation, including but not limited to:

- 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
- 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)
- United Kingdom Statutory Instruments 2012 No. 3032, The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012

Our restricted list of chemicals and 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 FY2022, ECHA added five new substances to the REACH candidate list of substances of very high concern (SVHCs), bringing the total number to 224 as of June 2022.

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. In FY2022, the five 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 224 SVHCs if present at >0.1 weight by

weight (w/w) in articles. Seagate continues to provide information on articles in our products containing SVHCs at a concentration above 0.1% w/w to ECHA's SCIP database on substances of concern in articles as such or in complex objects (products) established under the waste framework directive (WFD) (2008/98/EC). Unique SCIP notifications are created for all Seagate products that contain SVHCs above 0.1 w/w at the article level, with the information on candidate list substances available throughout the whole life cycle of products, including to businesses, customers, and recyclers at product end of life.

Seagate products use certain RoHS Annex III exemptions and supported the Pack 22 exemption renewal requests submitted by the industry Umbrella Project. The European Commission's consultant published proposed new exemption expiration dates that Seagate will monitor as they progress towards final approval. Seagate continuously works with our suppliers to determine if there are suitable lead-free alternative materials, and where possible, substitutions are made.

## Regulatory Compliance

In FY2022, Seagate worked to successfully comply with new and newly modified regulations, including but not limited to, those listed below. Seagate utilizes exemptions where applicable.



### European Union

EN IEC 63000:2018—  
Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances replaced EN 50581:2012



### Italy

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



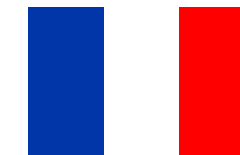
### United Kingdom

UK RoHS included in UKCA Declaration of Conformity



### Saudi Arabia

Technical Regulation for Restriction of Hazardous Substances in Electrical and Electronic Equipment (No. 01-09-21-179)



### France

FY2023 Planned: Anti-waste law for a circular economy 2020-105 (AGEC)



With the goal of exceeding these requirements, we strive 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 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 for their final products.

In FY2022, 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.

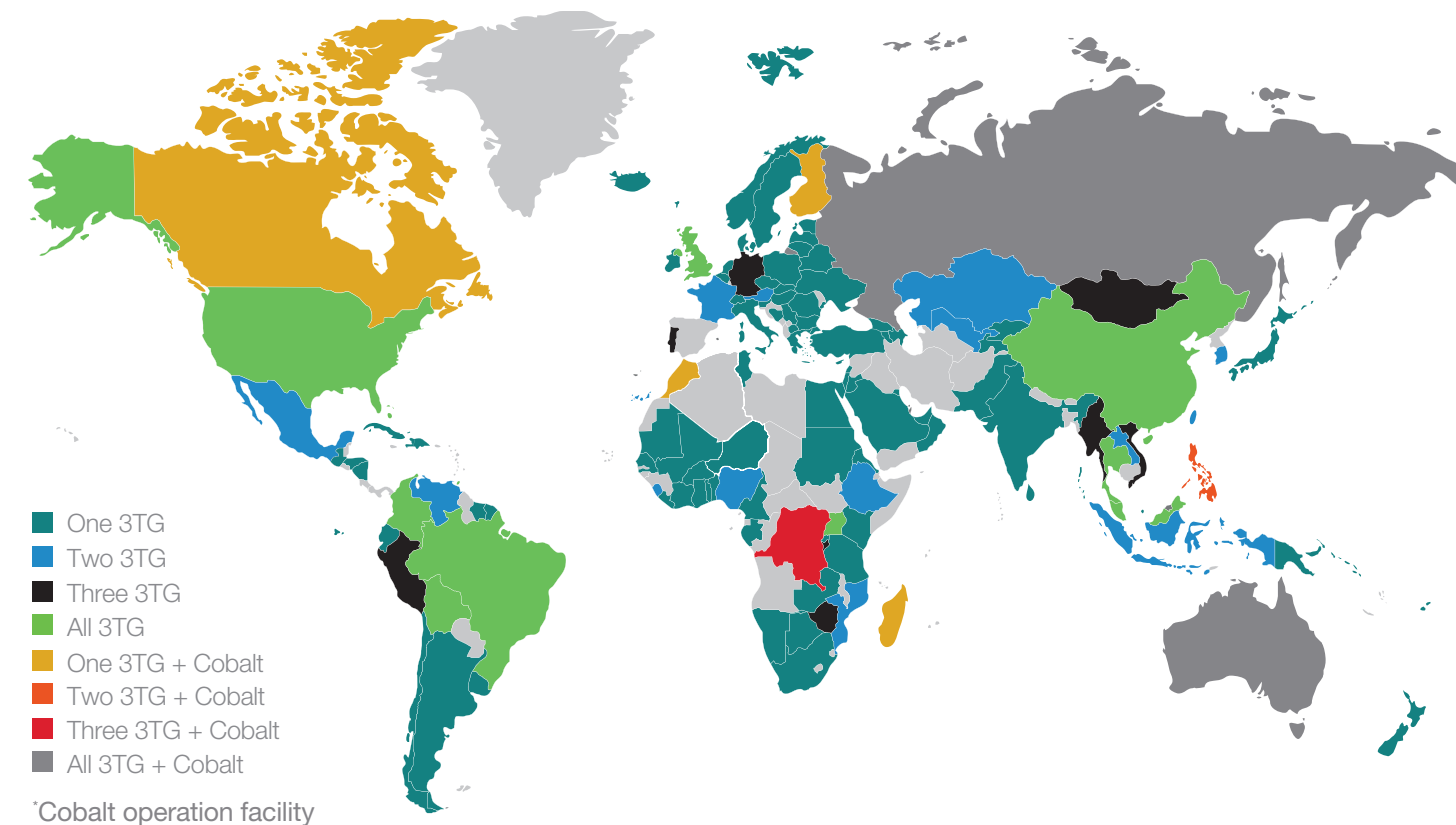
## Responsible Sourcing of Minerals



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 vigilant against human rights violations throughout 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 are sourced 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 adjoining country. 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 Securities and Exchange Commission (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 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).

In FY2022, Seagate's entire product portfolio containing 3TG was validated as "DRC conflict free". For the conflict minerals 2021 calendar year reporting period, CMRTs were collected from 100% 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 CY2021.



Seagate had an Independent Private Sector Audit (IPSA) of our responsible sourcing of minerals program conducted in CY2021. The IPSA concluded that our [Conflict Minerals Report for CY2021](#) filed with the SEC conformed in all material aspects with the Organization for Economic Co-operation and Development (OECD) due diligence guidance. The IPSA also found that Seagate's due diligence practices were consistent with the description provided in our conflict minerals report. The IPSA auditor's report was included in the CY2021 conflict Minerals report.

Throughout FY2022, Seagate continued to manage supplier communications and data via our CAS.



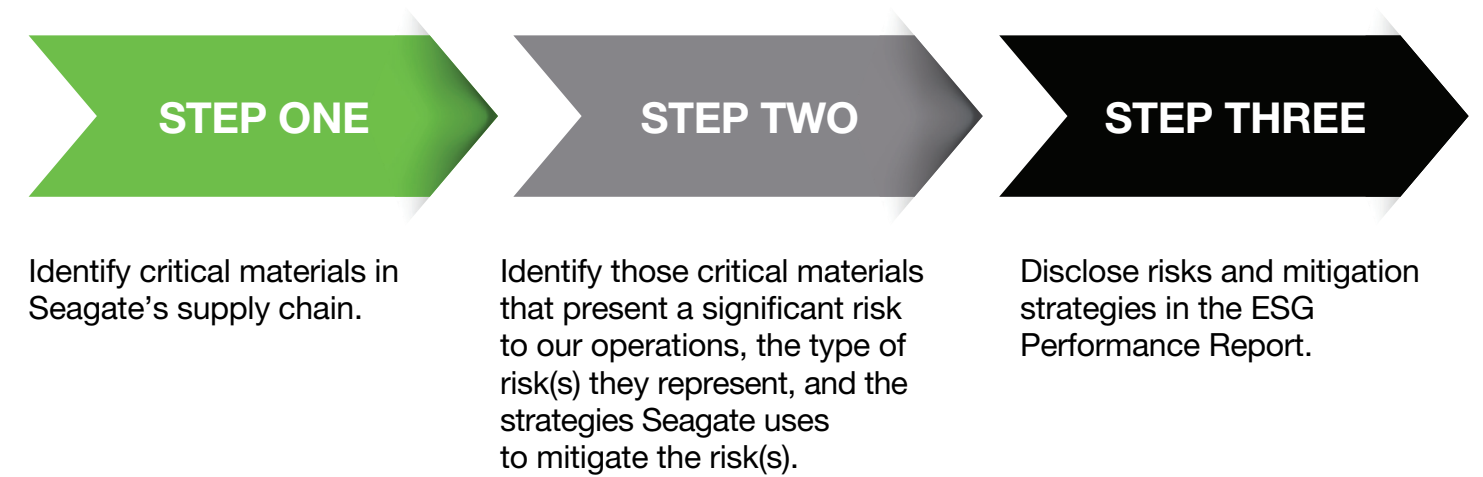
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## Critical Materials

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, 18 are present in our products. In FY2022, two additional minerals were identified as critical to our operations. An internal, interdisciplinary team at Seagate rated these 20 critical materials using a four-tiered risk rating across three risk domains. The risk ratings are specific to Seagate and are by nature temporarily variable; risks are re-rated no less frequently than on an annual basis.

In CY2021, two of the 20 minerals achieved a risk-score meeting or exceeding our internal threshold for reporting: cobalt and the rare earth elements (which we view collectively).

### The Process



### The Management of Risks Associated With the Use of Critical Materials

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 extended our due diligence beyond what is required by law and mapped 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 reuse 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.





# PEOPLE





## Our Employees

**We foster a work environment where employees feel valued, engaged, and committed to sharing their knowledge and ideas.**

Our policies and programs are designed to protect employees from potential work-related hazards, support wellness, and provide opportunities for development. Attracting, retaining, and engaging talented people from many backgrounds and perspectives enables Seagate to deliver products and solutions that address the increasingly complex needs of our customers.

Our people drive Seagate's success. At the end of FY2022, Seagate employed approximately 40,000 colleagues in more than 25 countries around the world. There was no significant fluctuation in the number of employees during the reporting period. That broad range of talent and diversity helps us create a more sustainable, collaborative, and customer-focused business.

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**~40,000**  
Employees

**25**  
Countries

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## FY2022 Global Employees: 40,127\*

### Total Employees by Region\*

| REGION   | Regular Employees | Temporary Employees | Total Employees |
|----------|-------------------|---------------------|-----------------|
| Americas | 11.5%             | 0.5%                | 12.0%           |
| Asia     | 83.0%             | 0.3%                | 83.2%           |
| EMEA     | 4.7%              | 0.1%                | 4.8%            |

### Total Employees by Gender\*

| GENDER | Regular Employees | Temporary Employees | Total Employees |
|--------|-------------------|---------------------|-----------------|
| Female | 58.0%             | 0.2%                | 58.2%           |
| Male   | 41.1%             | 0.6%                | 41.7%           |

| GENDER | Full-Time | Part-Time | Total Employees |
|--------|-----------|-----------|-----------------|
| Female | 58.0%     | 0.2%      | 58.2%           |
| Male   | 41.6%     | 0.2%      | 41.8%           |

\* 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. \*Some categories may not add up to 100% because some employees chose not to disclose.

Customers trust in the quality, performance, and innovation of Seagate’s storage products. We increase that trust by offering development opportunities to our people, providing them with the skills and learning opportunities to enhance their professional growth. A key part of our people strategy was to make FY2022 a year of development and career movement. To do so, our managers and employees were encouraged to work together to set strong goals and understand the various programs available to them for learning, development, and talent movement.

## FY2022 Key Focus Areas

### GROW TALENT

#### Recruitment Standard

Process to simplify, automate, and elevate the recruiting process and candidate experience.

#### Professional Development

Increased learning options for employees and provided targeted, on-demand, and facilitated training and resources to help leaders adapt to the rapidly changing work environment.

### INCLUDE AND ENGAGE

#### Global Wellness Campaign

Launched our first wellness campaign, with a global theme. Its intent is to develop resilience for better mental wellbeing and build awareness of the importance of resilience as part of our overall health, productivity, and happiness.

#### Diversity, Equity, and Inclusion

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.

### EMPLOYEE FEEDBACK

#### People Goal

In alignment with our value of Inclusion, every manager had a “People Goal for Managers” set for their organization. This goal represents each manager’s responsibility to grow and develop our global and diverse workforce, while building a team that values and respects the inclusion of all employees.



## Talent Hub Project

In March 2022, Seagate's talent acquisition team unveiled its Talent Hub project at operations sites in Singapore, Malaysia, China, Thailand, Normandale, Minnesota, and Springtown, Northern Ireland. The project aims to transform the experience for manufacturing specialist candidates by standardizing, automating, and simplifying the recruiting processes.

Gone are the days of completing an employment application with pen and paper. With the launch of Talent Hub, Seagate digitized the process. As candidates arrive, they are provided digital tablets to complete their applications. Recruiting teams have been trained to guide the candidates as needed. The interview room experience and location are another upgrade.

A same-day offer could be very appealing for a qualified and meaningful candidate's experience with Seagate. Elimination of response waiting periods, follow-up messages and call-backs to candidates enables Seagate to streamline the employment offer process and issue offers on a timelier basis.\*

\*These offers are only available for candidates in Singapore.



## 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 standards 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—as well as those of our supply chain (including in geographies that lack the regulatory protection or enforcement to manage concerns such as child labor)—requires specific attention. [Read our Human Rights Policy](#)





**COMMITMENT TO A RESPECTFUL WORKPLACE**

**We do not allow or condone any form of harsh or inhumane treatment.**

Seagate maintains 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.

**OPEN COMMUNICATION**

**Our open door policy and philosophy encourage open dialogue between employees and managers.**

In addition to formal and informal complaint or grievance procedures, employees or other concerned parties have easy access to Seagate's confidential Ethics Helpline to report complaints or concerns of unethical behavior, free from retaliation.

**PROHIBITION OF CHILD LABOR**

**Our policies oppose child labor, and we do not use child labor at any of our sites.**

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 FY2022, and we believe our controls for age verification keep such cases at a low risk.



**PROHIBITION ON FORCED LABOR**

**Our policies prohibit the use of any forced, bonded, indentured, or other compulsory labor.**

Our policies also prohibit our suppliers from using any forced, bonded, indentured, or other compulsory labor. Through RBA VAP audits there have been no cases of forced labor found in our operations in FY2022.

**FREEDOM OF ASSOCIATION**

**We respect our employees' right to freedom of association in choosing labor organizations to represent them.**

We strive to maintain positive relationships with the unions, works councils and employee associations that represent many of our employees. Worldwide, just over 14% of our employees were covered by collective bargaining agreements as of the end of FY2022. Through RBA VAP audits, there have been no instances of violation of freedom of association found in our operations, and we believe our internal channels for open dialogue and communication with our workforce help to keep such cases at a low risk. Working conditions and terms of employment for employees not covered by a collective bargaining agreement are determined independently.

**CONDITIONS OF EMPLOYMENT**

**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.**

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.



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% of our workforce as of FY2022.

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 FY2022 acknowledgment process, the policy was communicated to over 17,000 employees globally, and over 99% of those reviewed and acknowledged the policy. Annual policy acknowledgment is performed by global non-manufacturing specialist employees and non-manufacturing specialist employees in the U.S. and EMEA. Additionally, 100% of our security personnel who are Seagate employees received human rights training in FY2022.

## Equal Employment Opportunity Statement

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 Employment 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.



Seagate Thailand was honorably awarded with The 2021 Excellent Practices Establishment on Labour Relations and Welfare National for 14th consecutive year. This continuous achievement clearly demonstrates that our manufacturing sites have been carrying out exceptional efforts for compliance with the labor relations and welfare standards.





12

# Diversity, Equity, and Inclusion

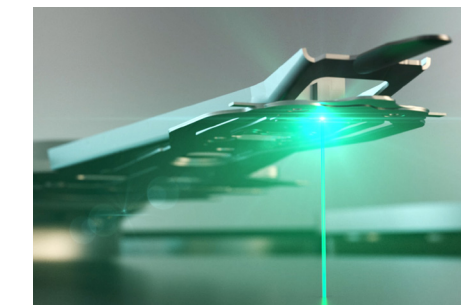
Diversity is one of the key drivers of Seagate’s continued success as a data storage leader. But diversity alone is not enough. To build a thriving culture, we must embrace inclusion and actively pursue solutions that support racial and gender equity, both within our workforce and our communities.

For more details, read our [FY2022 DEI Report](#).



## DEI in Action

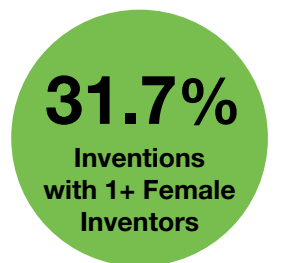
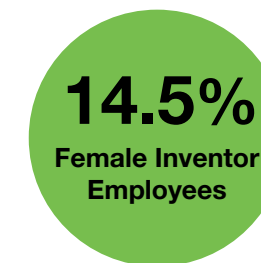
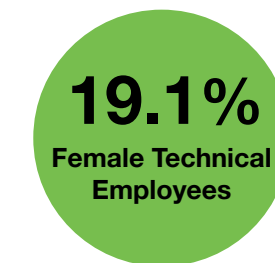
Throughout FY2022, Seagate undertook initiatives and efforts in support of diversity, equity, and inclusion (DEI). Some key highlights include:



### Diversity in Innovation Pledge

Seagate is a founding member of [The Diversity in Innovation Pledge](#), demonstrating our commitment to understanding and addressing the issue of underrepresented inventors. With over 5,500 U.S. patents, we understand the value of diverse experiences, backgrounds, and identities in advancing our innovation.

This past year, we tracked our progress related to female participation in our inventions and have seen an increase over the last fiscal year.



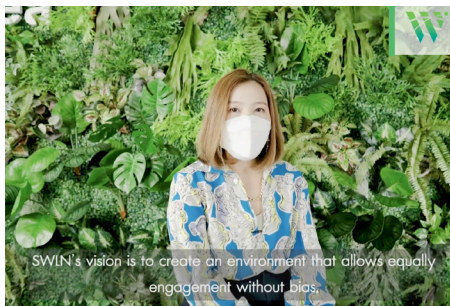




### Fostering LGBTQ+ Inclusion

One of Seagate's priorities is the active inclusion of our LGBTQ+ community. For Pride Month FY2022, we held community-building activities at many global sites, and in the U.S., sponsored Seagate booths at local Pride celebrations. Seagate continued to support and embrace LGBTQ+ awareness and inclusion by creating gender-inclusive templates for email signatures as well as all-inclusive, gender-neutral bathrooms in some locations.

We promoted ally training in FY2022, giving employees an opportunity to deepen their understanding of the LGBTQ+ community and what it means to be an ally. Since the program's launch in 2020, more than 700 employees have completed the learning journey at the conclusion of FY2022.



### Commitment to Gender Equity

Seagate is committed to improving gender equity in leadership positions. We took several measures in FY2022 to invest in gender equity by making it the topic of multiple forums and events involving Seagate women and executives. We have strengthened our leadership development for women across our organization and launched the seventh chapter of the Seagate Women's Leadership Network, with a new chapter in Thailand.



### Spotlighting Neurodiversity Inclusion

Throughout FY2022, we continued to support our neurodiverse community by providing employees with educational and training programs in partnership with Uptimize, a leader in neurodiversity education. By partnering with Mind Shift in the U.S., a nonprofit that focuses on how autism can be a competitive business advantage, we have fostered further equity as we recruit, assess, and train qualified candidates for temporary roles in our wafer (semiconductor) operations.



### Developing Our Employee Resource Group Leaders

In partnership with Thayer Leadership, an organization that builds leaders through principles and processes from the U.S. Army, we have been able to provide our voluntary employee resource group (ERG) leaders around the world with skills to help them in their careers and to further develop our ERGs.

### Supporting ERGs

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

With over 3,600 global members representing nine ERGs and 27 local chapters in FY2022, 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 value of integrity. Seagate analyzes the competitiveness of our programs at least annually to ensure compensation pay ranges and targets are in line with similar companies seeking similar talent. In addition to market analysis, we continually benchmark compensation best practices to provide employees with a competitive total compensation package.

We 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 U.S., we additionally look at race. Seagate bias prevention training is designed to eliminate bias in all employment decisions, including performance and compensation.

### Diverse Representation

Seagate is committed to being a place where all employees feel safe, respected, and welcomed for their unique background and perspective.

#### FY2022 Diversity of Employees

| JOB CATEGORY        | BY GENDER (GLOBAL) |       | BY AGE GROUP (GLOBAL) |       |       | U.S. MINORITY/NON-MINORITY |              |      |
|---------------------|--------------------|-------|-----------------------|-------|-------|----------------------------|--------------|------|
|                     | Female             | Male  | <30                   | 30-50 | >50   | Minority                   | Non-Minority | N/A* |
| Management          | 31.3%              | 68.7% | 2.0%                  | 54.4% | 43.6% | 30.8%                      | 65.7%        | 3.5% |
| Technical Employees | 19.1%              | 80.7% | 14.2%                 | 64.0% | 21.8% | 42.8%                      | 53.3%        | 3.9% |
| All Other Employees | 78.3%              | 21.7% | 23.9%                 | 63.8% | 12.3% | 48.4%                      | 47.5%        | 4.1% |

#### U.S. Only Diversity

| JOB CATEGORY        | Asian | Black or African American | Hispanic or Latino | White | Other** | N/A* |
|---------------------|-------|---------------------------|--------------------|-------|---------|------|
| Management          | 25.0% | 2.0%                      | 2.9%               | 65.7% | 0.9%    | 3.5% |
| Technical Employees | 35.2% | 2.1%                      | 3.2%               | 53.4% | 2.2%    | 3.9% |
| All Other Employees | 31.3% | 9.7%                      | 5.4%               | 47.5% | 2.0%    | 4.1% |

\* N/A is not available or not disclosed.

\*\* Native American or Alaska Native, Native Hawaiian or Pacific Islander, and Two or More Ethnicities.

Undeclared or other gender represent <1.0% of the population.

Data is compiled in accordance with the Sustainable Accounting Standards Board (SASB) and based on information derived from the HR Management System as of the end of FY2022.



## Building a Diverse Workforce

Diversity and inclusion are core components of our talent acquisition strategy. In FY2022, Seagate continued to focus on building a diverse workforce by recruiting talented candidates around the world. Taking steps to ensure hiring is inclusive of diverse candidates, Seagate strives to create a hiring process that is equitable, inclusive, and free from unconscious bias.

## Recruiting/Hiring

FY2022 Global Employee Hires: 7,838 (overall hire rate 19.5%)

| HIRE RATE BY REGION |       | HIRE RATE BY GENDER |       | HIRE RATE BY AGE GROUP |       |
|---------------------|-------|---------------------|-------|------------------------|-------|
| Americas            | 31.1% | Female              | 17.7% | <30                    | 56.3% |
| Asia                | 18.4% | Male                | 21.9% | 30-50                  | 10.6% |
| EMEA                | 10.9% |                     |       | >50                    | 10.4% |

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.

Seagate invests in the future by strategically recruiting on campuses for graduate hires and interns. We focus on hiring technical and non-technical graduates from universities at our global sites and in FY2022, we hired more than 250 graduates and 430 interns. We are creating a pipeline of diverse talent in the U.S. through partnerships with local and national diversity organizations, including the Society of Women Engineers, National Society of Black Engineers, and the Society for Hispanic Professional Engineers. Additionally, we engage in community outreach for LGBTQ+ and U.S. Veterans' organizations.

Seagate engages contingent workers to support Seagate operations for staff augmentation and on a case-by-case basis to perform a variety of functions. Contingent workers are responsible for supporting Seagate operations globally, helping to remain organized and ensure operational continuity.

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 talent through our global offerings. We are also active on key recruitment sites around the world, including JobStreet, LinkedIn, and Glassdoor.

## Colorado Interns



India Interns



EMEA Interns



Minnesota Interns



### Building a Diverse Workforce

In FY2022, we continued to strengthen our talent pipelines in the U.S. military and veteran community through Department of Defense partnership programs, Army PaYS (Partnership for Youth Success), and SkillBridge. Additionally, we formed direct partnerships with many military bases and their Transition Assistance Program (TAP) offices to develop a mutually beneficial collaboration between Seagate and military veterans. These programs focus on helping military members gain valuable corporate experience as they plan their transition to a civilian career.



Montel Williams' ["Military Makeover: Operation Career"](#), a U.S. talk show segment featured Seagate by highlighting the stories of three employee veterans who have transitioned from military to civilian life.



### Military Friendly Employer

Seagate was recognized as a Military Friendly Employer for 2022. Seagate earned this rating, which reflects our commitment to hiring veterans, by exceeding the standard in recruiting, support and retention, culture, and advancement opportunities for veterans. More than 1,500 organizations are rated annually for this military friendly designation.







For the fourth straight year, Seagate is proud to be named one of the Best Technology Companies for Women by Fairygodboss, an online community for women. To be considered for this honor, organizations are ranked based on positive reviews from employees. Reviews include perspectives about the Company’s commitment to gender inclusion, senior leadership support, and workplace culture. We earned the 2022 award in early FY2023.



Seagate has also been recognized as a Best Place to Work for LGBTQ+ Equality by the Human Rights Campaign four years in a row, from 2019 to 2022. Seagate earned this award by establishing and implementing comprehensive policies, benefits and practices that ensure greater equity for LGBTQ+ workers and their families.





# 13

## Employee Development, Engagement, and Retention

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 leaders and our online virtual coach resources.

Ongoing dialogue around these goals helps leaders and employees identify strengths, improve outcomes, and close performance gaps. We provide talent management and learning solutions that enable employees to reach their full personal and professional potential.

## Employee Development

Building talent in-house is an essential part of Seagate’s people strategy. Managers are empowered to influence our workforce by developing our talent through our goal setting and performance review cycles. Managers are trained to guide employees through the process using facilitated office hours, self-paced learning, help and Q&A resources. Seagate’s manufacturing specialist employees receive direct, ongoing feedback and coaching throughout the year from their supervisors.

Our non-manufacturing specialist employees are encouraged to develop two to three clear goals aligned to our overall Company strategy. In FY2022, we set a target of 95% of non-manufacturing specialist employees participating in the performance management process. Of these employees, 99% completed the goal setting and year-end review process in our online system, and 99%\* received a year-end goal review with their manager.

- \* This process does not include:
1. Manufacturing specialist employees
  2. Sales and sales management employees
  3. Employees hired after June 1, 2022

Participation in the performance management process by employee category and gender:

| EMPLOYEE CATEGORY    | FEMALE | MALE   |
|----------------------|--------|--------|
| Executive/Management | 97.03% | 98.35% |
| Professional         | 99.21% | 99.37% |
| Support              | 99.88% | 99.91% |

Data reflects performance evaluation data in our human resources management system during the reporting period. Overall participation rate is calculated using total number of participating non-manufacturing specialist employees divided by total non-manufacturing specialist employee headcount. Table shows participation percentage rates for each employee category by gender.

As part of the performance management process, leaders and employees work together to build personalized development plans. In FY2022, 99% of our non-manufacturing specialist employees created development plans and participated in the performance management process. Whether employees want to develop as a subject matter expert more deeply or expand their skills by trying something new, Seagate provides development programs to enhance career growth and development.



Participation in development plan process by employee category and gender:

| EMPLOYEE CATEGORY    | FEMALE | MALE   |
|----------------------|--------|--------|
| Executive/Management | 99.65% | 99.58% |
| Professional         | 99.56% | 99.58% |
| Support              | 99.64% | 99.80% |

Data reflects development plan participation data in our human resources management system during the reporting period. Overall participation rate is calculated using total number of participating non-manufacturing specialist employees divided by total non-manufacturing specialist employee headcount. Table shows participation percentage rates for each employee category by gender.

Employees can build skills, gain experience, and empower themselves through:

- Face-to-face training
- Seagate e-learning and classroom learning opportunities
- Strategic internal programs, such as: In-depth Leadership Training, Talent Acceleration Program, Core People Skills Program, Management Essentials Training, New Leader Essentials Training, The Delegate Program, Citizen Data Scientist, and Firmware Engineering
- On-the-job training
- LinkedIn Learning self-study courses and programs
- Tuition reimbursement for outside degree programs
- Internal Mobility opportunities through Career Discovery
- International assignments
- Seminar and conference opportunities
- Sponsorship, mentoring, and coaching

### Average Training Hours

| NON-MANUFACTURING SPECIALIST |                | MANUFACTURING SPECIALIST |                |
|------------------------------|----------------|--------------------------|----------------|
| GENDER                       | AVERAGE HOURS* | GENDER                   | AVERAGE HOURS* |
| Female                       | 9.7            | Female                   | 6.1            |
| Male                         | 10.5           | Male                     | 8.3            |

\* Includes training from the Seagate learning platform, LinkedIn learning, and our other internal training programs. Manufacturing specialist employees have a comprehensive training plan that includes a combination of classroom training and on-the-job training based on job function. On-the-job training hours are not currently captured in our learning platform and are not available for reporting.

In FY2022, Seagate launched a new core people skills program development opportunity. This program is a virtually facilitated synchronous program aimed at improving workplace competencies. This curriculum helps all employees communicate, interact, and work together effectively.

Seagate also offers the talent acceleration program (TAP), which supports employees who need specific training for their current roles, want to develop their skills in key knowledge areas, or who wish to transition or redeploy to new areas of the Company. While the initial focus of the TAP program was on technical upskilling, we are expanding it into equally important strategic skills as business needs evolve.

Seagate is also focused on our next generation of leaders. In FY2022, 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.



These opportunities allowed our employees to complete **281,051 hours** of learning and development in FY2022.





### Career Discovery Celebrates First Anniversary

Career Discovery is our internal mobility and career development tool that helps 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 that gives them the opportunity to learn something new. The tool platform is also a place where employees can find or become a mentor, to allow employees to share career advice, knowledge, networking, and skill development. In its first year, 2021, Career Discovery facilitated the filling of 248 jobs, 284 projects, and 168 mentorships.

Career Discovery helps to create positive employee engagement by developing our talent and providing new and exciting possibilities for our workforce, which helps with employee engagement and retention, and reduces the time to hire and onboard. We encourage our employees to check current job postings of interest through our Career Discovery site or sign up to receive a weekly digest of opportunities.

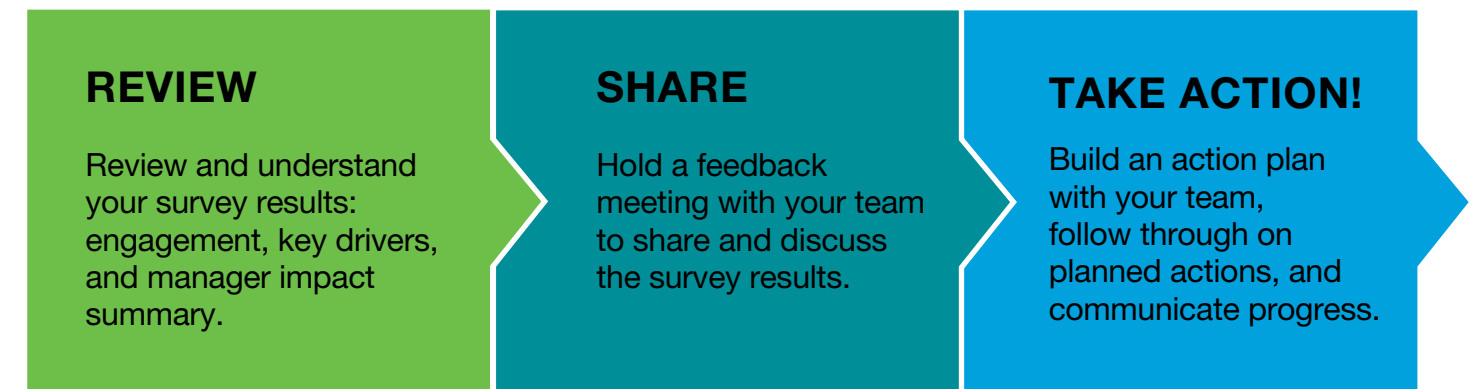
As of year-end FY2022, 352 mentorship assignments were established, enabling employees to expand their network and find career or skill-based guidance. Further, over 58,000 hours went into part time projects, which provided experiential learning for employees.

### Employee Experience and Engagement

A positive employee experience is critical to Seagate attracting, retaining, and engaging 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, wellness, career growth, belonging and Seagate values (integrity, innovation, and inclusion).

The survey concluded in early 2022, with more than 36,000 global employee respondents (a 92% participation rate). As in years past, all responses were confidential to encourage candid feedback.

### The Three-Step Action Model



Once the survey concluded, results were analyzed and then shared with management. Managers then followed a new three-step process to Review, Share, and Take Action! Managers reviewed and evaluated the data, shared it with their teams, discussed results, and built targeted action plans with their teams.

### Retention

Seagate prioritizes retaining and developing our workforce as we believe that reducing turnover helps retain knowledge and deliver deeper, longer-term customer relationships. Our voluntary annual turnover for non-manufacturing specialist employees remained below 10% for FY2022, below 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 the U.S., in situations where reductions in workforce are required, we provide outplacement services; in other countries, we align with legal mandates.





**PROSPERITY**



FY2022 Voluntary Turnover: 3,456 (overall voluntary turnover rate 8.7%)

| VOLUNTARY TURNOVER RATE BY REGION |      | VOLUNTARY TURNOVER RATE BY GENDER |      | VOLUNTARY TURNOVER RATE BY AGE GROUP |       |
|-----------------------------------|------|-----------------------------------|------|--------------------------------------|-------|
| Americas                          | 9.2% | Female                            | 9.0% | <30                                  | 18.9% |
| Asia                              | 8.8% | Male                              | 8.3% | 30-50                                | 6.5%  |
| EMEA                              | 5.4% |                                   |      | >50                                  | 3.9%  |

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.

# Community Engagement

Seagate's community engagement program allows us to live our values of integrity, innovation, and inclusion by supporting education and wellbeing within the communities where we have sites. In FY2022, Seagate continued to offer employees community engagement opportunities at major sites where we have 500 or more employees, covering approximately 96% of our workforce. Our community engagement partners include civic and academic institutions, employees, governments, local community members, and not-for-profit organizations.

# 14







In FY2022, Seagate participated in over 130 engagements and partnerships globally. As the severity of COVID-19 has begun to decline, some programs have remained primarily online while others have returned to in-person commitments. Our focus has pivoted from primarily COVID-19 relief programs to our long-standing focus on STEM programming for students. In many engagements, we used hybrid learning to deliver STEM programs in age-appropriate ways, facilitating learning in a fun, engaging way for students.

With multiple large sites across the globe, Seagate's community engagement program reflects our vertically integrated business model. Accordingly, the program is highly localized, involving a cross-functional process to identify meaningful, local opportunities. We involve our civic and academic institutions, employees, governments, local communities, and not-for-profit organizations to ensure the opportunities are beneficial.

## Widening EMEA Engagement Through Virtual Connections

Colleagues across EMEA kept connected with our education and learning partners through virtual workshops and events. From inspirational role model career insights to virtual engineering placement events for schools, the opportunity to share career experiences, stories and connect was important for both participants and students. Employees shared their individual career journeys and a realistic view of the many pathways into STEM. A virtual placement experience gave insights through group exercises into the many engineering roles at Seagate.

Throughout the 2021-2022 academic year, the education team reached students from across Northern Ireland through nine virtual events, reaching over 900 students from 50 schools supported by 20 STEM volunteers. These virtual experiences continued to support young minds to imagine their future and improve their understanding of the many career choices available.



## Seagate Sponsored STEM Robotics Tournament

The nonprofit organization Minnesota STEM Partnership hosted its first sumo robotics wrestling competition in St. Paul in June 2022. Sponsored by Seagate, 25 middle school and high school students from the Twin Cities competed in the state tournament.

In FY2022, students in the sumo program learned how to design, code, and build autonomous LEGO robots with the help of volunteers and mentors over four practice sessions. To place at the tournament, teams of two to three students needed to successfully flip or push their opponent's robot out of the wrestling ring.

Seagate provided funding that covered robotics equipment such as LEGO Mindstorm NXTs, LEGO kits, training for coaches and mentors, and shirts and transportation for students. Four Seagate volunteers supported the event. Learn more about this engagement [here](#).



15



## Health 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 benefits and wellbeing programs. Our benefits are benchmarked to local market practices, industry norms, and cultural requirements, and reflect our standards as a competitive, multinational 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 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.

Seagate provides paid parental leave benefits to eligible employees who welcome a new child to the family, either through birth or adoption. Although the specifics of parental leave may differ by country, the benefit is available globally to both female and male eligible employees. Seagate believes providing new parents with paid time off to care for newborns or recently adopted children contributes to the children's healthy development, improves maternal health, and supports fathers' involvement in care.

Our global Healthy Journeys wellness program seeks to educate, encourage, and support our employees as they work on achieving their health and wellness goals. All employees have equal access to the programs offered through Healthy Journeys and employee assistance programs globally. These programs offer counselling services and a hub of information on personal/emotional, family, relationship, work, and financial/legal advice.



## Resilience@Seagate

In FY2022, Seagate launched our first wellness campaign with a global theme and intent. The objective of the program was to develop employees' resilience for better mental wellbeing and to build awareness of the importance of resilience as part of our overall health, productivity, and happiness.

The four-week campaign focused on one key message each week to equip employees with simple strategies to help build resilience. More than 2,700 employees participated in a diversity of fun and informative programs and contests in each region.



### The Four Key Messages

**Building Connections:** Building supportive relationships with people around us can help to embrace vulnerability and support one another. This will strengthen our resilience and we can get through the difficult times feeling cared for and much less alone.

**Fostering Wellness:** Building resiliency means starting with our own health and wellbeing first. This includes our physical, mental, and emotional health. Caring for ourselves during challenging times means that we will be better equipped to manage daily life in the future.

**Finding Purpose:** Purpose is essential to resilience. If we live with purpose, we are also apt to live longer, have better health, and make better lifestyle choices.

**Vitamin G, the Secret to Happiness:** When it comes to building your emotional resilience, nothing works better than maintaining a positive outlook and regularly expressing gratitude.

There is no shortage of things causing stress and worry in today's world, such as the COVID-19 pandemic, social restrictions, health fears, increased geopolitical tensions, contentious politics, and a fraying of social norms. These factors have created a perfect storm of anxiety and uncertainty—with a significant impact on global mental health. Our employees work hard for the Company and our customers, and we feel it's important that they take time to build their own resilience and strengthen long-term wellbeing.



## APAC

In Asia Pacific (APAC) in FY2022, we lived our Healthy Journeys vision by supporting a culture of health and wellbeing for our employees.

We continued to promote Wellbeing 365 for the entire region. This program offers our employees and their dependents access to qualified providers who can support them with a variety of life issues 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, Thailand, and Malaysia, health and financial awareness talks were organized, and 585 employees attended.

## EMEA

In EMEA, a video-based wellness platform continues to be utilized by employees. The platform provides access to thousands of video-based programs focused on exercise, nutrition, resilience, and stress management as well as financial education. Seagate continues to encourage employee participation in these through online employee newsletters, emails and stands on-site.

## U.S.

In FY2022, in addition to participating in the global mental health initiatives, our U.S. sites focused on financial wellness with ongoing educational webinars. Video-based programs were also heavily utilized by employees through our wellness platform, offering education in physical, emotional, and social wellbeing. We provided continuous emails, webinars, and competitions to encourage employees' participation in our wellbeing programs.



## Health and Safety

The health and safety of Seagate employees, contractors and visitors is a critical 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 environment, health, and safety (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 FY2022, 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.



| GLOBAL HEALTH AND SAFETY BY THE NUMBERS IN FY2022   | AMOUNT          |
|---|-----------------|
| Work-related fatalities   | 0               |
| High consequence work-related injuries  | 0               |
| High consequence work-related injury rate   | 0.00            |
| Recordable case rate <sup>1</sup>   | 0.19            |
| Days-away case rate <sup>2</sup>  | 0.12            |
| Health and safety regulatory visits hosted  | 60              |
| Notice of violation findings  | 2               |
| Fines levied  | None            |
| Health and safety e-learning courses held and completed with "satisfied" completion status <sup>3</sup> | 84,106          |
| Meals served globally per month (average) <sup>4</sup>  | 558,156         |
| Foodborne illnesses reported  | 0               |
| Miles that Seagate bused employees  | 5,418,368 miles |
| Vehicle incidents per million miles traveled <sup>5</sup>   | 0.7             |

<sup>1</sup> Total recordable case rate (TRIR) total recordable incidents x 200,000/total hours worked.

<sup>2</sup> Lost workday rate (DART-L) total lost workday incidents x 200,000/total hours worked.

<sup>3</sup> Examples of EHS e-learning 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.

<sup>4</sup> Seagate has a formal food safety program at all of our sites.

<sup>5</sup> All incidents are investigated and actions are taken to prevent recurrence. This includes accidents contributed by Seagate and third parties.





The hazard profile of Seagate is typical of an electronics manufacturer and includes slips, trips, 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.



Over 45% of all work-related injuries are caused by two incident types: slips, trips, and falls, and ergonomic musculoskeletal disorders. Seagate has extensive programs, initiatives, training, and communication dedicated to incident reduction in these two incident types at the site and global level. Company and site scorecards reflect targets dedicated to incident reduction. 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.



Seagate regularly evaluates the risks and hazards relevant to our operations, services, and sites. These risk assessments typically occur as a baseline to any new or existing operations, activities and products, when an incident occurs or whenever new hazards are introduced, or processes changed. Risk assessments are reviewed at least annually to confirm that no changes have occurred to current risk values. The risk assessment teams are determined on a site-by-site basis and typically consist of cross-functional team members, subject matter experts, EHS personnel, department representatives and other affected stakeholders. This is to mitigate the likelihood of work-related hazardous events or exposures and to prevent negative outcomes to employees, contractors, interns, agency temps, assets and other resources. Seagate's top identified health and safety risks include COVID-19; ergonomics; slips, trips, and 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 to 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 provides Seagate's 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 wellbeing. The on-site occupational health clinics located at the Springtown, Northern Ireland, Wuxi, China, Johor, Malaysia, Korat and Teparuk, Thailand and Woodlands, Singapore sites saw approximately 76,000 clinic visits in FY2022. Occupational health services include medical surveillance, emergency support, work-related case management, injury and illness visits, pre- and post-employment physicals, fitness for work, Seagate's COVID-19 response, and wellness program support. Employees' personal health-related information is maintained confidentially by certified and licensed medical/nursing staff in the Cority occupational health module. Seagate's occupational health clinics, listed above, also provide services to on-site contractors and visitors if they have symptoms on-site; moreover, the clinics also provide occupational medical examinations to an on-site contractor who works under Seagate supervision.

Contractors working at Seagate locations are required to comply with Seagate's 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.



### Wuxi Employees Strike Back Against COVID-19

During FY2022, a movement restriction was imposed in Wuxi, China due to an outbreak of COVID-19. Approximately 1,700 employees, both manufacturing specialists and logistics support personnel, stayed on-site at the Wuxi facility for a full week. Their willingness to stay on-site allowed for operations to continue at a reduced capacity as opposed to halting altogether. During the week spent on-site, employees volunteered their rest time to assist at the antigen testing station on-site. Their tireless efforts ensured that employees were kept healthy and safe from COVID-19 while spending time on-site.



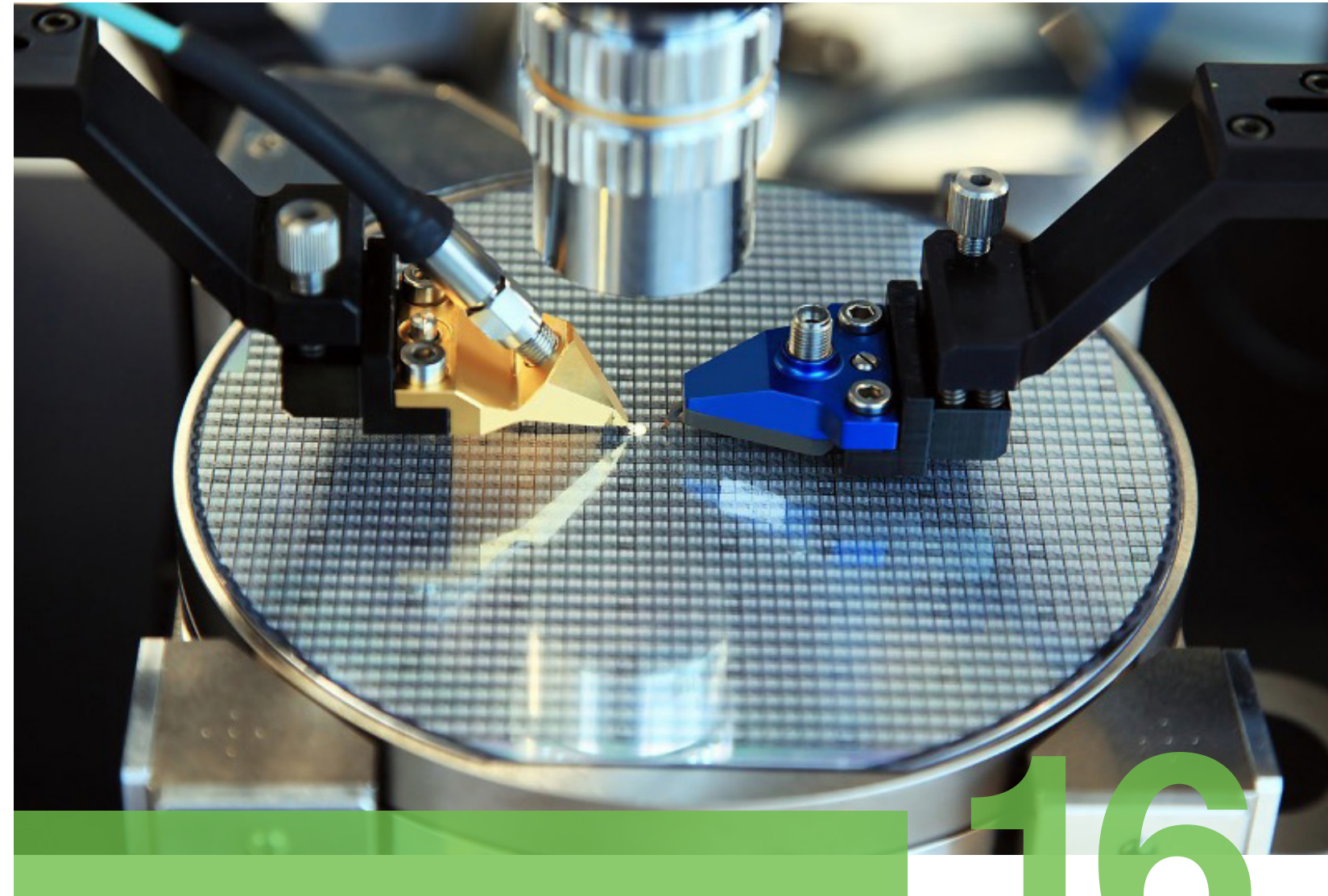
## Health and Safety: Process Chemistry

Seagate recognizes that our commitment to ensuring workers are not exposed to hazardous chemicals does not stop at the walls of our factories but extends throughout our supply chain. The beginning of this journey is understanding the chemicals used at each point of our supply chain. To support this aim, we have developed Seagate's Enterprise Chemical Management System (ECMS). The ECMS is a single, global platform for selecting, ordering, tracking, using, and disposing of all chemicals used in our manufacturing processes. The ECMS helps Seagate standardize practices, meet customer and regulatory reporting requirements, reduce costs, and support business process management across all sites.

To enable the effective transfer of chemical usage information between companies, the Clean Electronics Production Network (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 to the development of the PCDC tool through pilot testing and development of its user training manual.

Seagate plans to continue using the PCDC tool to develop an inventory of the chemicals that are used in our supply chain, and gather information on how those chemicals are used, and identify 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 FY2022, Seagate continued annual process chemical documentation for all manufacturing sites. Going forward, we plan to conduct process chemistry investigations into our downstream suppliers to ensure documentation is obtained.



# 16

## Supply Chain

### Supply Chain Responsibility

Agility is key in meeting Seagate's 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 due diligence critical to Seagate.

Seagate seeks to ensure people are treated fairly in our supply chain while responsibly managing resources through education, strategic management, and transparency to and from our manufacturers.



Seagate has two categories of suppliers:

- Direct - those that provide components and parts of our products
- 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 implementing and monitoring 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.

Our supply chain ESG 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. Seagate uses the RBA Code of Conduct as our suppliers' Code of Conduct to which all suppliers are expected to comply. Seagate firmly expects our suppliers to cascade the RBA Code of Conduct further downstream in the supply chain. Our supply chain due diligence process is documented in an internal CSOP.



Seagate is proud to have earned the CDP's Supplier Engagement Leadership award for our 2021 work in supply chain leadership. This award was given to Seagate for our excellent supplier engagement programs, addressing our Scope 3 emissions, and the percentage of our suppliers collaborating with us on creating GHG and water reduction targets.

### Supplier Engagement and Collaboration

Seagate regularly meets with suppliers to share expectations and evaluate our level of engagement. This proactive approach with suppliers ensures goals and standards are aligned. We require on-site service providers, such as cafeteria and janitorial services, to adhere to Seagate's standard operating procedures. This ensures all on-site 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 providing local talent.

Our supply chain organization has full-time staff and dedicated resources to monitor RBA compliance and education, and applicable local and global 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 such as RBA Code of Conduct conformance, financial sustainability, and process improvement, we innovate and scale for the benefit of our partners and our mutual prosperity.



In FY2022, Seagate delivered training via seven outsourced webinar sessions and two internally sourced webinar sessions, with approximately 600 supplier participants. These webinars included topics on responsible sourcing of minerals, RBA code version 7.0, GHG management, and forced labor. The webinars included implementing the RBA Code of Conduct, and developing 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 in preventing slavery and human trafficking in our business and supply chain.

Seagate has an active presence in the RBA. Our involvement improves our ESG efforts and 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 of Sustainability and Transformation serving as Board Chair for the first half of FY2022 and Immediate Past Chair during the latter half of FY2022 due to term expiration, while also serving on the RBA Executive Committee.



Through our RBA Validated Audits within our supply chain in FY2022, cases of high recruitment fees by our suppliers involving foreign migrant workers in Malaysia and Thailand were identified. During the year, Seagate worked with the RBA and other customers of these suppliers to confirm the allegations and quantify the fees involved. While identifying the recruitment fees, especially in a worker’s home country, has been extremely challenging, it 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 FY2022, over \$500,000 was reimbursed by those suppliers to over 2,500 employees. One supplier completed remediation actions, and we continue to track the remediation of another supplier. We will maintain our engagement with our suppliers to ensure ethical recruitment and hiring practices are maintained.

### Supply Chain Due Diligence

Seagate’s supplier due diligence process considers multiple factors (such as type of supplier, spend, on-site or off-site) in determining suppliers falling within the scope of our RBA programs. Seagate uses the self-assessment questionnaire (SAQ) and 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 determine instances of non-conformance within RBA’s Code of Conduct to identify root causes and implement 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% of new suppliers identified in the scope of our policy, are screened annually. The SAQ assesses supplier compliance with code requirements. We target to align our suppliers with the latest RBA Code of Conduct revision updates, conflict-free mineral development plan, and RBA environmental questionnaire. In FY2022, 234 suppliers either completed or updated their SAQ and released it via the RBA online system.

Seagate requires all 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.

## Responsible Business Alliance FY2022 Update

**125**

**direct and packaging suppliers**

completed the RBA environmental survey.

70% have GHG reduction targets, 67% have water reduction targets.

**234**

**targeted suppliers (direct and indirect)**

completed the SAQ.

**51**

**full supplier audits completed<sup>1</sup>**

during FY2022 through the RBA VAP.

71 were completed in FY2021, for a total of 122 active supplier audits.

**Platinum Level Recognition**

**5.88%**

**of audited suppliers**

received a full score in the initial VAP audit.

**3**

**supplier closure audits conducted<sup>2</sup>**

to ensure suppliers previously found non-compliant have implemented correction measures on any violations found in the initial VAP audit.

**94.1%**

**Closure rate** of nonworking-hour findings.

**95.5%**

**Closure rate<sup>3</sup>** of working-hour findings.

<sup>1</sup> Five audits postponed due to COVID-19.

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

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

The reduction in percentage of suppliers having GHG and water targets is due to an increase in total suppliers.



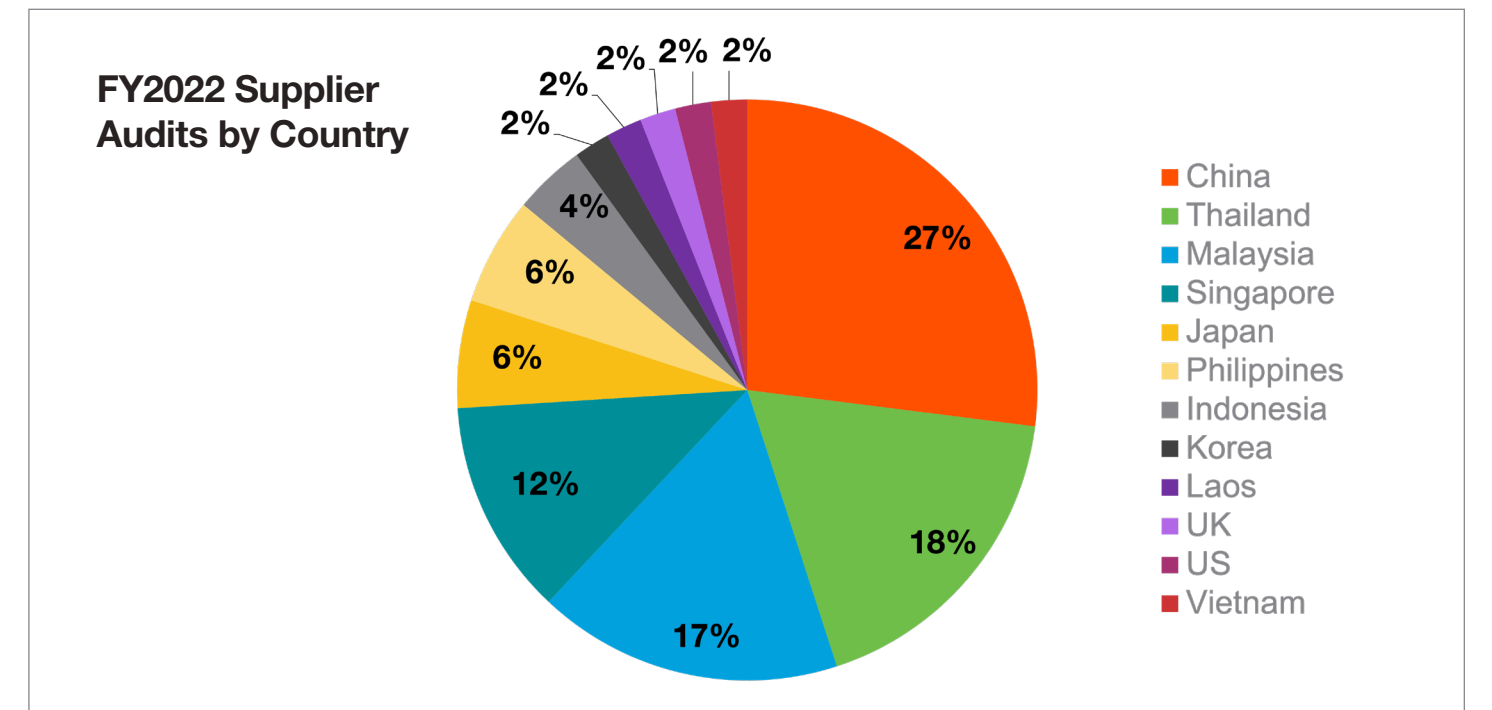
| Indicator  | Quantitative  | Percentage/Rate                            |
|--|---|--|
| Percentage of Tier 1 supplier facilities audited in the RBA Validated Audit Process (VAP) or equivalent, by (a) all sites and (b) high-risk sites. | a) FY2022 41/46<br>(Note: Five audits postponed due to COVID-19.)<br><br>b) N/A (No high-risk sites). | a) 89%<br><br>b) N/A (No high-risk sites). |

|   |  |   |
|---|--|---|
| Tier 1 suppliers (1) non-conformance rate with the RBA VAP or equivalent, and (2) associated corrective action rate for (a) priority non-conformances and (b) other non-conformances. | 1) Priority non-conformance = 24<br><br>Other non-conformance = 236<br><br>(Total audits = 41) | a) Priority non-conformance = 0.58 findings per audit<br><br>b) Other non-conformance = 5.75 findings per audit<br><br>Priority non-conformance corrective action rate = $(24-12)/24 = (50\%)$<br><br>Other non-conformance corrective action rate = $(236-3)/236 = (98.7\%)$ |
|---|--|---|

Seagate tracks “priority” and “major” finding closure rates in addition to SAQ and VAP completion. At the end of FY2022, the closure rate of nonworking-hour findings was 94.1%. The closure rate of working-hour findings was 95.5%.

Top 10 Supplier VAP Audit Findings

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



We remain vigilant regarding 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 Thailand, Malaysia, and Singapore pose the highest risk. For the past five years, our training on forced labor has focused on suppliers in these countries. 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.

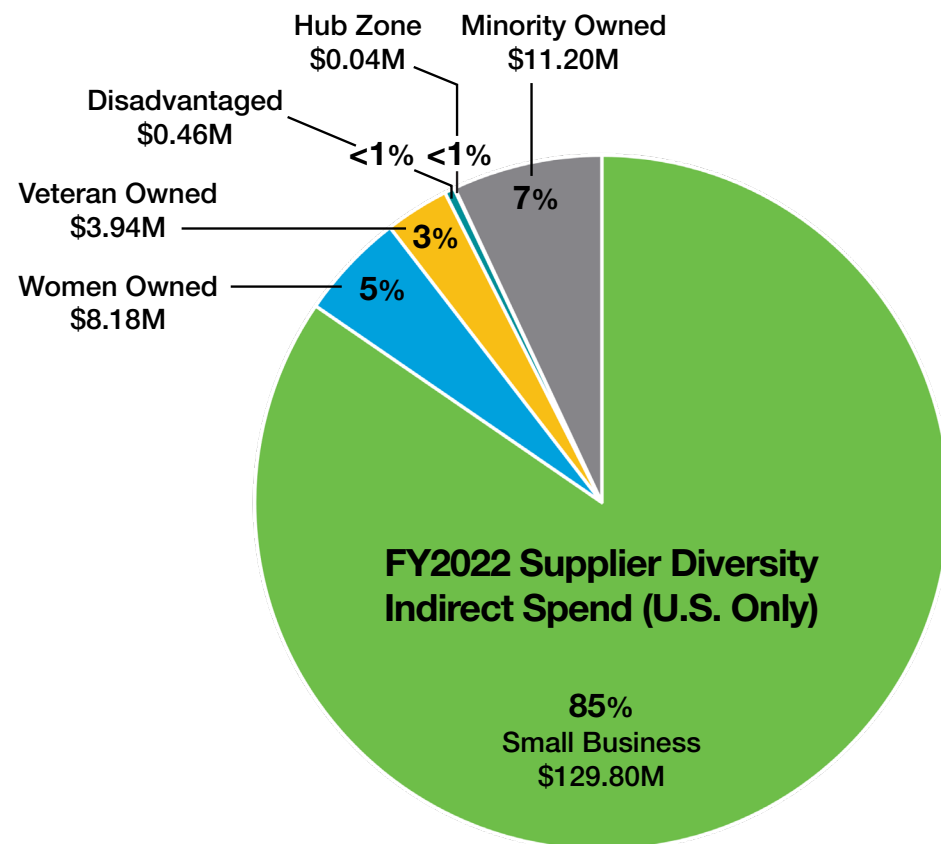


Our audit results have not identified any geographies of concern for freedom of association and collective bargaining in FY2022. Most of the findings in this area are related to suppliers not having a policy/procedure on the right of peaceful assembly.

### Supplier Diversity

Our global customer base, local communities, employees, and suppliers make up a diverse network spanning the globe. To encourage diversity in our supplier base, diverse suppliers in the U.S. are encouraged to participate in Seagate's competitive bidding process. Seagate regularly contracts with diverse suppliers who qualify and successfully compete for our business. Minority businesses in the U.S. include 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.



Hub Zone: A business operating in a designated historically underutilized business zone, and certified by the U.S. Small Business Administration. Indirect spend refers to expenses incurred for materials, services, and maintenance required to operate the business.



17

## Stakeholder Engagement

### Supply Chain Responsibility

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.



**ESG:** Each year, we solicit feedback from customers and business partners to help shape our ESG program. We openly share detailed information about our environmental performance and GHG emissions to help the electronics industry reduce its environmental impact. Input from stakeholders helps ensure we have a best-in-class program.

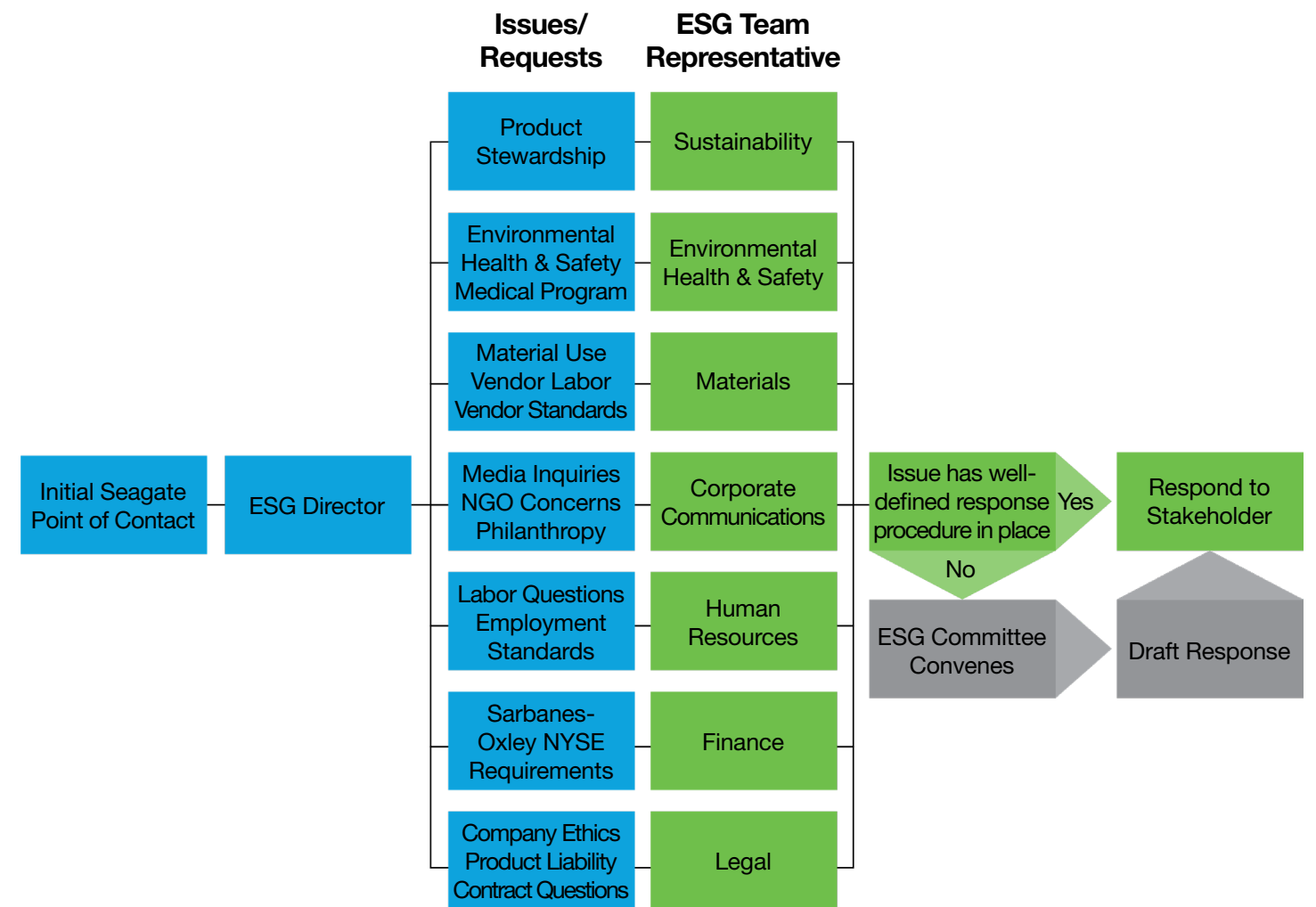
**Quality:** We solicit feedback on our performance, reliability, and product quality through net promoter score surveys and customer scorecards. These reports are produced quarterly and are shared with internal teams to both celebrate successes and focus on areas for improvement.

**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.

### ESG Stakeholder Inquiry Process

Seagate has an established process to address specific stakeholder ESG issues or requests. A cross-functional effort is responsible for the process. The types of information provided range from environmental performance, product stewardship, and product safety to labor standards, fair trade, supply chain, and more. Please see the following chart depicting how requests and inquiries are distributed to relevant parties within Seagate for response.

For any requests and inquiries please reach out to: [social.response@seagate.com](mailto:social.response@seagate.com)





## 18



## Business Continuity

### Business Continuity Management System Overview

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 BCMS throughout FY2022 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.

Since transitioning our business continuity planning practices to comply with the requirements of ISO 22301:2019, Seagate continues to maintain a robust BCMS. Our commitment to continuous improvement of the system is guided by a business continuity performance scorecard, which sets the program framework for our HDD and component sites, as well as design centers across the enterprise. This commitment is also shown through program expansion to include our Lyve products. Our HDD manufacturing sites in China and Thailand were audited in CY2021 and re-certified to the second edition of the ISO 22301 standard, ISO 22301:2019. In addition, in FY2022 our supply chain risk management program continued to proactively monitor supplier risk with global event monitoring and completing assessments of our critical suppliers. We continued to deploy our enterprise business continuity software, which was further enhanced in FY2022 to align with our document management practices and the requirements of ISO 22301: 2019 and remains our central repository for all business continuity documents and assessments.





# GOVERNANCE





## Code of Conduct

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 do business. Our Code of Conduct explains the standards all Seagate team members are expected to embody in meeting our corporate values and complying with Seagate policies and the specific laws and regulations that apply to us. 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 including gifts and entertainment, privacy, confidentiality, anti-harassment and anti-discrimination, and antitrust and fair dealing. Managers have a responsibility for guiding their teams and conducting their functional area in compliance with the Code of Conduct. Incidents and corrective actions are investigated and managed pursuant to the Code of Conduct and the related Global Investigations Policy. Our employees are directed to make ethical decisions and are provided with support by management, human resources, our Chief Compliance Officer, regional compliance officers, and compliance and ethics team if questions arise. In addition, our Chief Compliance Officer meets regularly with our CEO and the Audit Committee of the Board of Directors to review compliance and ethics matters and discuss progress on objectives and key results (OKRs) related to the program. More details about our Code of Conduct are available [here](#).

To promote awareness and understanding of the Code of Conduct, it is available in the following eight languages: Chinese, English, French, Korean, Malay, Portuguese, Spanish, and Thai. All employees other than manufacturing specialists are required to annually certify that they understand and are compliant with the Code of Conduct and are required to complete annual Code of Conduct training and initial training promptly after the first day of employment. The training is available in Chinese, English, French, Korean, Malay, Spanish, and Thai. In FY2022, 99.5% of all non-manufacturing specialists completed these key compliance trainings.

Seagate's Code of Conduct is supplemented by our Code of Ethics for senior financial officers, which is applicable to the CEO, CFO, and principal accounting officer or controller, or persons performing similar functions. Amendments or waivers of the Code of Ethics are disclosed promptly on our website or in a current report on Form 8-K filed with the SEC. In FY2022, no amendments were made, and no waivers were requested or granted. Our FY2022 proxy statement describes our Code of Conduct, Code of Ethics, and other compliance and ethics policies. Our Code of Ethics can be found [here](#).



# Compliance and Ethics



# 20

## We work to continuously improve and strengthen Seagate's Compliance and Ethics Program (C&E Program).

We take a coordinated and cross-functional approach to creating 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 the internationally accepted hallmarks of an effective compliance program, and we take a strategic, risk-based approach relevant to Seagate and our employees.

Seagate's Global Compliance and Ethics Council (GCEC) brings leaders from all key business functions together 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 GCEC's effectiveness is continually assessed, and in FY2022 was matured through the development of additional operational subcommittees to meet Seagate's growing business needs. This created synergies and cross-functional collaboration with key partners such as human resources, sustainability and transformation, finance, sales, operations and technology, and Seagate's Lyve business. Through these partnerships, Seagate continually builds and enables a culture focused on a variety of areas of importance such as sustainability, diversity, equity, and inclusion.

The C&E Program is supported by a global team, including the Chief Compliance Officer, regional compliance officers, the GCEC, and compliance and ethics team, which include subject matter experts and experienced lawyers who are geographically dispersed throughout the organization.

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 require all non-manufacturing specialists to certify themselves to key policies. We also provide training and awareness to employees, key business partners, and customers, on Seagate's expectations in key areas such as anti-bribery, anti-corruption, antitrust, and fair competition.

Seagate conducts regular ethics risk assessments at our manufacturing sites in accordance with the Ethics section of the RBA Code of Conduct, which is consistent with Seagate's Code of Conduct. In FY2022, we conducted ethics risk assessments at four of our seven manufacturing sites. Seagate's Code of Conduct, C&E Program, policies, standards and values of integrity, innovation, and inclusion underpin our strong culture of compliance and ethics. By setting clear expectations about how Seagate conducts business, we empower our employees to act with integrity.





## Board of Directors and Board Committees

**Our corporate governance framework is designed to create and support appropriate oversight and informed decision-making to better serve the long-term interests of our shareholders and other stakeholders.**

Seagate is governed by our Board of Directors (the Board), which is elected annually by our shareholders. The Board directs and oversees the management of the business and affairs of the Company in a manner consistent with the best interests of the Company and its shareholders. In this oversight role, the Board serves as the ultimate decision-making body of the Company, except for those matters reserved for the shareholders. In FY2022, Michael R. Cannon served as our Board Chair. He is an independent director and does not serve as a senior executive of the Company.

**The Board of Directors has three standing committees:**

**Audit and Finance Committee (AFC)**

[AFC Charter](#)

**Compensation Committee (CC)**

[CC Charter](#)

**Nominating and Corporate Governance Committee (NCGC)**

[NCGC Charter](#)

As part of our director identification and selection process, the NCGC considers a variety of factors, including but not limited to diversity, independence, professional experience, competencies, and education, that adequately address the Company's needs in light of its strategy. Shareholders have the right to nominate director candidates pursuant to our Constitution and the NCGC evaluates such candidates on substantially the same basis as it considers other nominees. Following the NCGC's recommendation, all directors are up for election by shareholder vote on a yearly basis at the annual general meeting of shareholders.

In addition, the NCGC oversees the Board, Board Committee, and director self-evaluation process, which seeks to assess the Board's performance, makeup, and diversity. The NCGC would recommend changes to our Board composition and organizational practices in response to the evaluations, if they were to indicate that a change is needed. The Board has decided not to adopt specific term limits for directors because our Board does not have a mandatory retirement age for directors and the NCGC engages in a robust annual evaluation of all director nominees for the following year.

Upon the nomination of a director and then yearly thereafter, the NCGC evaluates whether directors are independent under the NASDAQ Stock Market listing rules. In FY2022, all members of the NCGC and all our non-employee directors met that independence standard. In addition, all non-employee directors receive compensation that is periodically reviewed by the CC, which recommends, for approval by the Board, the amount and form of director compensation.

**For more information on our corporate governance framework, please read:**

[FY2022 Proxy Statement](#)

[Corporate Governance Guidelines](#)





Our Board and management take conflicts of interest seriously and Seagate has established a number of guardrails to prevent and mitigate this risk. Our NCGC is tasked with overseeing issues involving related party transactions and potential conflicts of interest of directors and executive officers. Our Board has also adopted a written policy for approval of transactions in which the Company is or will be a participant and any director or executive officer will have a direct or indirect material interest. This Related Party Transactions Policy helps to prevent and mitigate conflicts of interest for our directors, including risks associated with cross-board membership, cross-shareholding with suppliers and other stakeholders, and third parties' relationships with the Company. Conflicts of interest are disclosed to shareholders as required by law, including but not limited to, in our annual report on Form 10-K and the FY2022 proxy statement under "Certain Relationships and Related Transactions."

The Board oversees the members of senior management who are charged by the Board with conducting the business of Seagate. The Board provides oversight of the formulation of the long-term strategic, financial and organizational goals of the Company and the plans and processes designed to achieve those goals on a regular basis. The Board also assesses management's approach to and tolerance for material risks affecting the business. At least two times per year, the Board reviews the steps the Company's management is taking or has taken to monitor and control risk within risk tolerance guidelines. In addition, through Seagate's internal audit program, the Company ensures that the above management approach, processes, measurements, and controls are operating effectively in managing the risk and opportunities. Based on the performance metrics and internal audit results, the Company takes actions to improve the programs. The Board's oversight is furthered by the direct reporting relationship between the Company's internal audit function and the AC.

The Board is responsible for ensuring that ESG opportunities and oversight of related risks are integrated into our long-term strategy. Rather than concentrating all ESG oversight solely at the Board or into a single Board Committee, given the multi-faceted nature of the Company's approach to ESG and its integration into our overall strategy, the Board believes each of its committees should maintain oversight over the particular ESG matters that fall within its charter.

The Nominating and Corporate Governance Committee annually reviews ESG governance including with respect to company culture, corporate social responsibility, sustainability, diversity and inclusion, and human rights issues. The Audit and Finance Committee annually reviews ESG disclosure controls. The Compensation Committee bi-annually reviews ESG performance metrics in the context of our overall executive compensation programs.

The Board reviews regular reports on the matters covered by this report and oversees the processes established by management to report and monitor ESG matters. Economic, environmental, social, and governance programs are managed by the relevant functional departments, with oversight by senior executives who report directly to the CEO. These include, but are not limited to, the Senior Vice President of Sustainability and Transformation; Senior Vice President and Chief Human Resource Officer; Senior Vice President, Chief Legal Officer, and Company Secretary; and the Executive Vice President of Operations and Technology.

Both the Board and management recognize that we advance the long-term interests of our shareholders by responsibly addressing the concerns of other constituencies, including employees, customers, suppliers, and the communities in which the Company operates. Senior management engages with stakeholders and reports periodically, and as appropriate, to the Board on relevant matters.

Senior executives report to the Board on the management of our impacts on the economy, environment, and people on a regular basis, including on the outcomes of programs and processes we have established to adhere to Responsible Business Alliance Code of Conduct and the United Nations Global Compact principles and standards, on our target and performance towards our sustainability, data protection, compliance and ethics, and women in leadership goals, as well as on other matters, such as diversity of our workforce, employee development, and employee health and safety. Management presents information to the Board through management presentations, financial and operating reports, reports on current issues, and other types of methods that could enhance a director's perspective on a matter. In addition, the Board is offered resources to advance its collective knowledge on sustainable development.



### Board Diversity

At the end of FY2022, our Board consisted of ten directors with a broad range of skills, backgrounds, experience, and knowledge, and of which three directors identified as female and three as ethnically diverse.

We demonstrate our value of integrity by disclosing our Board’s gender, age, and racial/ethnicity diversity metrics. Data is compiled in accordance with the Sustainable Accounting Standards Board and based on information derived from the HR Management System as of the end of FY2022. Diversity of employees information is self-reported. Up-to-date information on the Board of Directors is available on our website [here](#).

| JOB CATEGORY  | BY GENDER |       | BY AGE GROUP |       |       | U.S. MINORITY/NON-MINORITY |              |      |
|---|-----------|-------|--------------|-------|-------|----------------------------|--------------|------|
|   | Female    | Male  | <30          | 30-50 | >50   | Minority                   | Non-Minority | N/A* |
| Board of Directors<br><small>(non-employee; excludes CEO)</small> | 30.0%     | 70.0% | 0.0%         | 10.0% | 90.0% | 30.0%                      | 70.0%        | 0.0% |

| JOB CATEGORY  | Asian | Black or African American | Hispanic or Latino | White | Other** | N/A* |
|---|-------|---------------------------|--------------------|-------|---------|------|
| Board of Directors<br><small>(non-employee; excludes CEO)</small> | 20.0% | 10.0%                     | 0.0%               | 70.0% | 0.0%    | 0.0% |

\* N/A is not available or not disclosed.  
 \*\* Native American or Alaska Native, Native Hawaiian or Pacific Islander, and Two or More Ethnicities.  
 Undeclared or other gender represent <1.0% of the population.  
 Data is compiled in accordance with the Sustainable Accounting Standards Board (SASB) and based on information derived from the HR Management System as of the end of FY2022.

### Executive Compensation

Our long-term executive compensation is aligned with performance targets and metrics, including ESG performance targets. Our CC reviews ESG performance metrics on a yearly basis in designing executive compensation policies, and in FY2022, engaged Semler Brossy, an independent third-party consultant, for advice and counsel on our compensation plans. In FY2022, our CC approved the addition of two modifiers that link the achievement of specific ESG goals to our performance-based equity—a social gender diversity goal and an environmental greenhouse gas reduction goal that align compensation to our broader Company commitment to global citizenship. For more information and details on our compensation plans and policies, please see our [FY2022 proxy statement](#) filed with the SEC on September 1, 2022.



## Shareholder Engagement

# 22

We recognize that the long-term interests of the Company are advanced when our shareholders are engaged. The annual general meeting provides an opportunity each year for the shareholders to ask questions of, or otherwise communicate directly with, members of the Board on specific concerns and other matters relevant to the Company. In addition, our Corporate Governance Guidelines provide an address and email where shareholders and other interested parties may communicate with the Board and raise questions, comments, or grievances. Our FY2022 proxy statement also provides contact information in “Communications with Directors.”

Our shareholders have the right to call a special meeting, pursuant to our Constitution. In addition, our Board has the right to issue preferred share purchase rights on terms advantageous for and for purposes of influencing takeovers. For more information on shareholder rights and takeover defenses, please see our [Constitution](#).





## Data Governance

**We are committed to protecting all data entrusted to Seagate, including the personal and confidential information of our employees, partners, and customers.**

We utilize a cross functional Enterprise Security Risk Management structure that meets quarterly for functional accountability in the areas of information security, data governance, product security and physical security. This group identifies continued areas of improvement for the Company in areas of technology, processes and training with oversight by the Audit Committee of our Board of Directors.

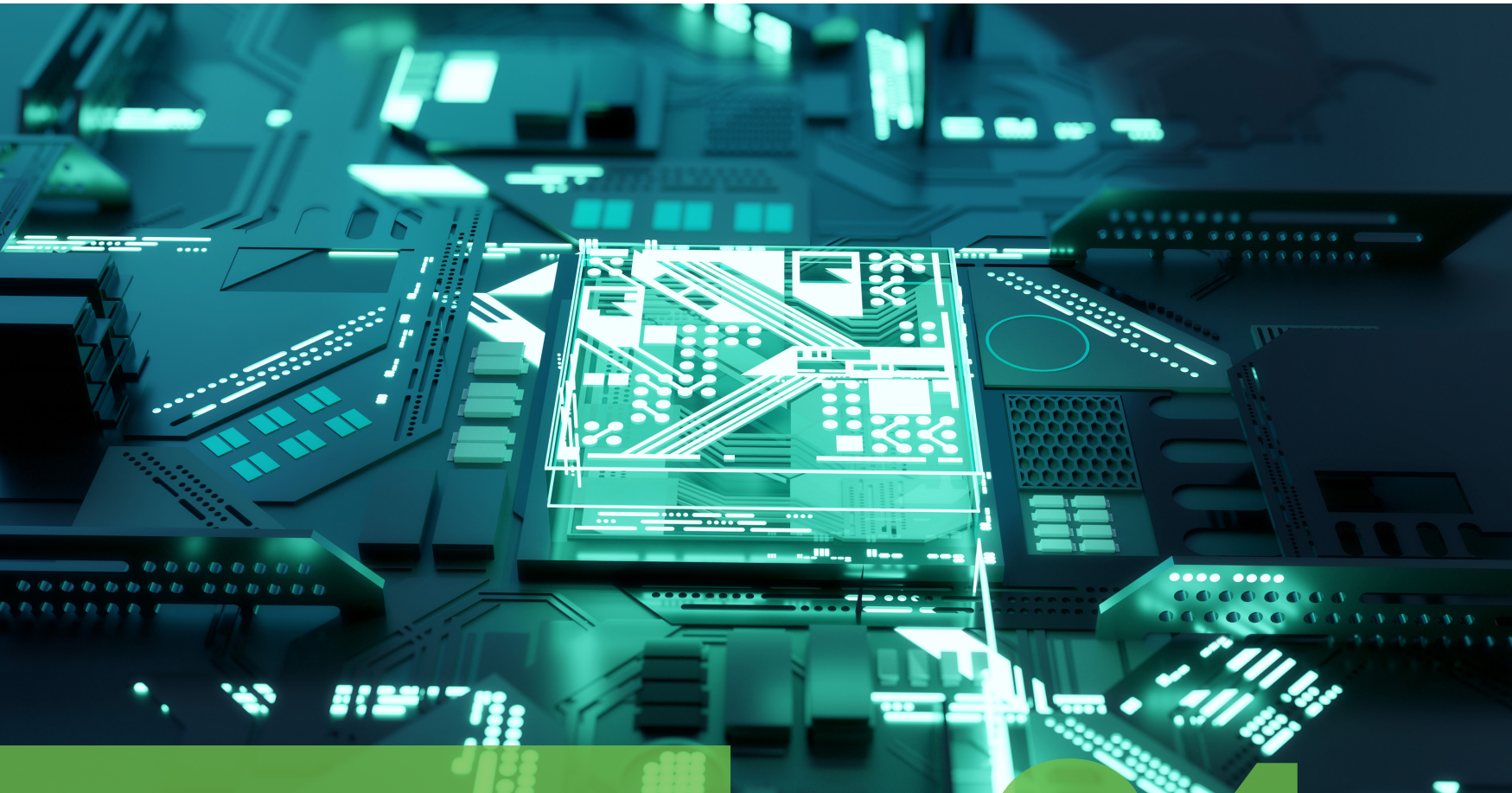
Our global data privacy program has adopted a principles-based approach that incorporates General Data Protection Regulation (GDPR) concepts and Fair Information Practice Principles (FIPPS) including accountability, security, data quality and integrity, use limitation, data minimization, purpose specification, individual participation, and transparency. We utilize industry leading privacy management software to automate certain aspects of our privacy compliance program for a better user experience and to improve efficiency and impact. Through cross-functional collaboration, we

continue to build on this foundation to comply with global data privacy laws applicable to our business such as the GDPR, Singapore Personal Data Protection Act, and the California Consumer Privacy Act. We 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 team that maintains a data classification framework for implementing appropriate protection protocols for all data within Seagate. Through routine evaluation of the full data life cycle—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 unauthorized access, compromise, and loss. We seek to strike the right balance between the productivity required for smooth business operations and security controls necessary for effective data protection.

Seagate's Records Retention Policy and accompanying Records Retention Schedule forms the basis for efficient preservation of Seagate records. The records are retained for a definite retention period as required by law, for business or regulatory reasons. In line with the industry trends, the records and information management team is developing an electronic records management system.





## Product Security

# 24

Product security is at the forefront in our continual commitment to integrity. As data becomes a larger contributor to the world's global economy, both its value and risk grow, increasing the need for data protection. Safeguarding our products and the data they store is achieved through a holistic approach to secure best practices at every phase of the product life cycle.

To further structure and operationalize product security controls, in FY2022, a product security assurance (PSA) framework governance structure scalable across the Seagate enterprise has been developed by the product security office. The PSA consists of 10 domains that encompass the core aspects of product security for Seagate products and services so that data confidentiality, integrity, and availability are maintained. Each domain consists of a set of policies, standards, guidelines, and procedures that must be followed to have product integrity across the design, source, build, deliver, and service phases of the product life cycle. 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 confidentiality and integrity in product development systems using a structured process. Development systems that are critical to the integrity of the product's security are routinely validated for compliance 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 product and data security vulnerabilities and risks using 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.

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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 product life cycle stage, from development and manufacturing to sourcing and delivery. We have implemented comprehensive product life cycle standards and frameworks, including ISO certifications, to create safeguards for our business and our supply chain. Critical component suppliers are in scope for this security review process and are audited by an independent third party using the same requirements Seagate leverages for its own security best practices.

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 secure data sanitization by integrating standards-based security controls on the drive and host software, 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](#).



25



## Ethics Helpline and Reporting

Seagate's Ethics Helpline is available to our employees on the homepage of Seagate's intranet. It is also available to those outside of Seagate on the investor relations website. Contact information is available on the homepage of both Seagate websites. Concerns may be reported by phone or email in English, Spanish, French, Chinese, Korean, Malay, Portuguese, or Thai. Throughout FY2022, we continued to internally and externally promote our Ethics Helpline so that employees are aware that they can report illegal or unethical situations confidentially and anonymously, to the extent anonymity is permitted by local law, without any fear of retaliation. We benchmark our Ethics Helpline to stay current with industry standards for information security, process improvements, reporting, and resolution.

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 compliance officer. In addition, our Chief Compliance Officer provides periodic reports to the Board on all material concerns received through our Ethics Helpline, regardless of whether they were specifically addressed to the Board. Seagate encourages employee consultation and supports the ability of employees to address complaints without the fear of retaliation. Further information on Seagate's Ethics Helpline can be found [here](#).





26

## 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 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 U.S. 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 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 FY2022:**

American Chamber of Commerce, China  
 American Chamber of Commerce, Malaysia  
 American Chamber of Commerce, Singapore  
 American Chamber of Commerce, Thailand  
 Boulder, CO Chamber of Commerce  
 China Association of Enterprises with Foreign Investment  
 Clean Electronics Production Network  
 Confederation of British Industry  
 European Union Chamber of Commerce in China  
 Federation of Thai Industries  
 Fremont, CA Chamber of Commerce  
 IEC  
 Information Technology Industry Council  
 IPC  
 Irish Business and Employers Confederation  
 Londonderry Chamber of Commerce  
 Longmont, CO Area Economic Council  
 Longmont, CO Chamber of Commerce  
 Northern Ireland Chamber of Commerce  
 Responsible Business Alliance  
 SEMI  
 Silicon Valley Leadership Group  
 Singapore Business Federation  
 United for Patent Reform  
 United Nations Global Compact  
 United States Information Technology Office  
 U.S.-ASEAN Business Council  
 U.S.-China Business Council  
 U.S.-India Business Council





## Acronym Index

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





[www.seagate.com](http://www.seagate.com)

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