



Human Rights Policy

We respect internationally recognized human rights, including those reflected in the [International Bill of Human Rights](#). Consistent with the [Organization for Economic Co-operation and Development \(OECD\) Guidelines for Multinational Enterprises](#) and the [UN Guiding Principles on Business and Human Rights](#), we are committed to identifying and addressing actual and potential human rights impacts connected to our operations and supply chain.

Seagate has adopted the [Responsible Business Alliance Code of Conduct](#) as its Supplier Code of Conduct.

Our Workplace

We are committed to maintaining a workplace that is free from unlawful discrimination, harassment, and unsafe working conditions.

We uphold the International Labor Organization's Fundamental Principles and Rights at Work, including the prohibition of forced, bonded, trafficked, or child labor and practices that restrict freedom of movement. We recognize employees' rights to freedom of association and collective bargaining and employees' ability to choose to be represented or not. We are also committed to having working hours, wages, and benefits that meet or exceed legal requirements. We comply with applicable labor and employment laws wherever we operate.

Human Rights Due Diligence and Speaking Up

We conduct ongoing, risk-based human rights due diligence to help identify, prevent, mitigate, and address actual or potential human rights impacts in our operations and supply chain.

We are committed to maintaining an open working environment where everyone can freely discuss workplace issues and concerns with all levels of management. If someone has a work-related problem, they should feel free to ask their supervisor or supervisor's manager for help. If the problem remains unresolved, or if the person chooses not to speak to a manager, Human Resources can also help resolve problems. Additionally, Seagate's Ethics Helpline is available to employees, suppliers, and members of the community, with anonymous reporting available where permitted by law.

We prohibit retaliation against anyone who in good faith raises a concern. We review concerns and take appropriate action consistent with our policies and applicable law. Information on how to contact the [Seagate Ethics Helpline](#) is available on our website.

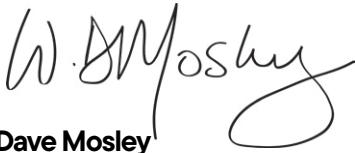
Accountability and Governance

Seagate's senior management provides oversight of this policy and our human rights commitments, with the Board of Directors receiving regular updates on human rights and sustainability matters. Day-to-day implementation is supported by cross-functional teams, including Sustainability, Legal, Human Resources, and Supply Chain.

We integrate respect for human rights into our governance processes, risk management activities, and business decisions.

This policy complements [Seagate's Code of Conduct](#) and related policies and standards, which together guide expectations for our workforce and suppliers.

For additional information, visit [Sustainability at Seagate](#).



Dave Mosley
Chairman and Chief
Executive Officer



Patricia Frost
Executive Vice President and Chief
People and Places Officer