

Supplier Agreements

- Suppliers are required to acknowledge and operate within Code requirements, which prohibit child and forced labor.
- We require direct suppliers to comply with Seagate's Responsible Sourcing of Minerals Policy, which prohibits the use of tin, tungsten, tantalum, gold, or cobalt from any source whose supply chain -- back to the mines of origin of the minerals used to produce these metals -- contributes to human rights abuses in the Democratic Republic of Congo or adjoining countries.

Supplier Capacity Building

Key suppliers* have undergone training in Code requirements, using internally and externally developed materials. These suppliers are required to use the training in their organizations to drive awareness and conformance with the Code. Supplier training programs are organized in high-risk geographies to build supplier knowledge in the area of child and forced labor.

Events

During FY2024, Seagate conducted several supplier education and training courses, ranging from one-on-one sessions to small groups and webinars. Three training sessions were conducted during the year to increase the knowledge of suppliers on key topic areas including responsible sourcing of minerals, and forced labor.

Supplier Risk Assessments and Due diligence processes

Key suppliers* are required to complete the RBA Self-Assessment Questionnaire, which serves as a risk - assessment tool to identify gaps in supplier programs related to Code conformance. Follow-up action is taken with these suppliers to develop corrective action plans to address gaps.

Supplier Audits

It is important that we conduct due diligence within our supply chains to understand whether there is evidence of any breaches of the Code, and to determine whether sufficient controls are in place. To do this, supplier compliance is periodically validated using the RBA's third-party audit Validated Assessment Program (VAP). These announced, prearranged audits review compliance with the Code and local regulations and include an assessment of the risk of child and forced labor. Forty-four supplier VAP audits and sixteen supplier closure VAP audits were conducted during the fiscal year.

Risk Assessment and Mitigation

Seagate remains vigilant to the risk of child labor within our supply chain, as discussed above, as well as the risk of forced labor within our supply chain. The highest risk of forced labor in our supply chain is where foreign migrant labor is utilized; suppliers in Malaysia, and Thailand pose the highest risk. This is why, in addition to carrying out risk assessments and audits as referred to above, our training on forced labor has been focused on suppliers in these countries over the past years. During the fiscal year, we continued to work with our suppliers in mitigating the risk of

forced labor and verifying cases where facilities were identified as utilizing foreign migrant workers who had paid high recruitment fees during the hiring process in past years. Working with our suppliers and the RBA, remediation plans were developed to reimburse the fees paid to the affected workers. Approximately USD 622,000 was reimbursed to 1,559 workers in the supply chain in FY2024. We continue to work with our suppliers to complete the remediation plan and introduce improved controls during the hiring process so that foreign migrant workers do not pay any fees.

Key Performance Indicators

In addition to the staff and supplier education and training described above, our ESG Performance Annual Report provides details of our Supply Chain program activities, and performance and plans for the coming year. In fiscal year 2024, our supplier RBA VAP audit closure rate for priority and major findings was 79.9% for working hour related findings and 84.2% for other findings.

*Key suppliers are defined using an internal matrix. After applying our criteria, the list includes 80% of direct suppliers by spend; suppliers contracted to provide services or material input for Seagate finished goods or services; and other onsite suppliers who utilize foreign and migrant labor.

This statement was approved by,

A handwritten signature in black ink, appearing to read 'G. Romano', with a long horizontal flourish extending to the right.

Gianluca Romano

Date: June 6, 2025