SEAGATE

Seagate Technology Holdings Public Limited Company

United Kingdom Tax Strategy for the fiscal year ended 3 July 2026

Seagate Technology Holdings Public Limited Company

United Kingdom Tax Strategy
Fiscal year ended 3 July 2026

Introduction

- This document sets out the policy and approach of Seagate entities and branches in the United Kingdom to conducting their tax affairs and managing tax risk in accordance with paragraph 16(2) of Schedule 19 of the UK Finance Act 2016 in respect of the fiscal year 2026.

- This document covers the following entities and branches (collectively referred to as ‘the Seagate UK entities’):

    - Seagate Systems (UK) Limited;
    - Seagate Technology (Ireland) (1); and
    - Seagate Technology (Netherlands) BV. (2)

- The Seagate UK entities are part of a multinational group of companies (“the Seagate Group”) whose ultimate parent entity is Seagate Technology Holdings Public Limited Company, incorporated in the Republic of Ireland. The Seagate UK entities are committed to the sound management of their tax affairs, including compliance with their tax filing and tax payment obligations.

(1) UK Branch of a Cayman Islands registered company.

(2) UK Branch of a Netherlands registered company.

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Governance and tax risk management

- All of the Seagate UK entities affairs are subject to Seagate's Code of Conduct and Code of Ethics for Senior Financial Officers. Both documents adopt a principles-based approach to Seagate's activities, including our approach to taxation, while promoting ethical conduct and emphasizing that Seagate and all of its employees must comply with all applicable laws and regulations.

- Consistent with this approach, the Seagate Group manages tax risk through established policies and audits covering key tax processes. Seagate Technology Holdings Public Limited Company is a U.S. Securities and Exchange Commission ("SEC") registrant and therefore subject to internal control over financial reporting under Section 404(b) of the Sarbanes-Oxley Act (15 U.S.C. 7262(b)).

- Specifically in relation to the Seagate UK entities, the UK tax function is managed by a global team of professionally qualified Seagate employees, located in the UK and elsewhere, who ultimately report to the Chief Financial Officer ("CFO"). The team reporting to the CFO provides periodic reporting on material global tax matters or risks and provides advice to the business on UK tax related matters, including the tax positions, tax compliance and related risks. The team also manages the relationships with tax authorities and assists in various forms of tax and financial reporting. Where there is uncertainty or complexity, appropriate external professional advisors are engaged to provide specialist advice. Where necessary and relevant, the CFO may discuss tax matters with other members of the executive team. The Audit and Finance Committee of Seagate's Board of Directors provides regular oversight on tax matters, along with the full Board as appropriate.

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Governance and tax risk management (continued)

- Both global and UK level controls are in place to monitor and review tax positions taken by the UK entities. These are reviewed periodically and in line with Seagate's filing requirements. Regular system and control checks are conducted to evaluate Seagate's tax accounting procedures.

Attitude to tax planning

- Seagate considers UK tax laws when structuring the commercial activities of the Seagate UK entities and any tax planning undertaken is based on the substance of these activities and applicable laws and regulations.

- The Seagate Finance and Tax departments work closely with management representatives of Seagate's business operations to understand, inform and explain the tax ramifications of the decisions taken by management.

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Tax risk

- Given the scale of our business and volume of tax obligations, risks will inevitably arise from time to time in relation to the interpretation of tax laws and the nature of our compliance arrangements. We consider tax risk on a case-by-case basis taking into account relevant facts and circumstances and only take tax positions that are reasonable and defensible under UK tax law. The Group does not engage in aggressive or artificial tax planning arrangements. We proactively seek to identify, evaluate, manage, and monitor tax risks. Where uncertainty exists or complexity is significant, Seagate evaluates tax positions based on the strength of the technical analysis, relevant professional advice, and the commercial context. Seagate monitors changes in UK tax legislation and HMRC guidance to assess any impact on its UK tax positions and compliance obligations.

Working with HMRC

- Seagate seeks an open, honest, transparent, and constructive relationship with HMRC. Our dealings with HMRC are conducted in a collaborative, courteous and timely manner. Seagate seeks to resolve issues involving any of its UK entities through early dialogue and engagement, escalating matters appropriately where needed. Seagate believes that a strong relationship with tax authorities is an effective way to manage its UK tax positions.

Management Approval

- This UK Tax Strategy statement has been approved by the Directors of the Seagate UK entities on August 6, 2026.