



Human Rights Policy

As a global industry leader, Seagate welcomes the responsibility to also be a "Global Citizen." In partnership with employees, community members, customers, suppliers, and other stakeholders, our commitment to Global Citizenship includes support of the United Nations Guiding Principles on Business and Human Rights and the Ten Principles of the United Nations Global Compact within our sphere of influence. These Principles address responsibility for the environment and other matters; however, most address the international human rights and labor standards that must be upheld to ensure the well-being and dignity of each person.

We have developed policies to reinforce our commitment to uphold these human rights and labor standards. We will abide by these policies or the local law in the countries where we operate, whichever sets a higher standard. Managers are responsible for upholding these Principles and for ensuring adherence to all company policies and guidelines in their support.

The following are some of Seagate's basic standards with regard to International Human Rights and Labor Standards (including the International Labor Organization (ILO) core labor conventions*):

Respectful treatment. Employees must respect and value each other and we hold everyone accountable for this. Violations, such as physical abuse and/or harassment or the threat of either, are not tolerated. All employees will be allowed access to basic liberties while on Company premises.

We respect religious diversity and employees may be provided with reasonable accommodations for religious practices, upon request. Any requests for reasonable accommodation should be directed to Site Human Resources.

Employment based on achievements. Decisions about employees are based on achievements against job goals and/or standards and required competencies; decisions about applicants are made on qualifications against job requirements. In all employment actions, we prohibit discrimination 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 identity, gender expression, 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.

Free to express opinions. Every employee has a right to openly express their opinion. In fact, we welcome and encourage ideas and input, including notification of issues and concerns.

Fair compensation. We assess performance against job requirements and consider business conditions and appropriate market comparisons to deliver compensation. We will compensate employees with wages and benefits that meet or exceed the legally required minimum without delay and will clearly communicate to all employees their compensation earned.

Due process. We understand that an employee may not meet performance or conduct expectations. In such circumstances, the employee has a right to a fair process of review. Any resulting disciplinary actions will be humane. Deductions from wages as a disciplinary measure will not be permitted.

Reasonable limitation of working hours. The hours worked by employees should not exceed 60 hours per work week or be in excess of the maximum hours of daily labor set by local laws in the countries in which we operate. We will also provide employees with at least one day off per every seven days. Overtime will be voluntary and comply with all applicable overtime pay requirements. No unreasonable restrictions of movement will be placed upon employees during non-work hours.

Free to associate. We respect and adhere to all applicable laws concerning the right of workers to organize in labor unions and engage in collective bargaining and peaceful assembly, and Seagate will not prohibit or impede employees exercising such rights. However, we believe maintaining an open, unencumbered relationship between Seagate employees and their managers is the most effective means of addressing work environment questions and concerns.

Free to choose employment. We will ensure that the overall terms of employment are voluntary. We will not require employees to pay the Company any remuneration or withhold an employee's government-issued identification upon hire. We firmly prohibit any form of human trafficking or slavery, and will ensure no forced, bonded (including debt bondage) or indentured labor; involuntary or exploitative prison labor is used in the production of Seagate products.

Employment at age 18 or higher. We strictly prohibit child labor and will comply with all local minimum age laws and requirements and/or set a minimum employment age of 18, whichever sets the higher standard.

Intern Program. We provide internship opportunities to college/polytechnic/university students, who meet our minimum employment age of 18. This program provides interns an opportunity to undergo supervised practical development and gain real-world experiential learning that compliments their education. Seagate does not offer any type of apprentice program. Additionally, Seagate does not hire student workers other than those that meet the criteria for the intern program.

For additional information, visit Seagate's [Global Citizenship website](#).

*Note: * Our labor standards in the Human Rights policy address the core ILO Labor Conventions No. 29, 87, 98, 100, 105, 111, 138 and 182.*