

11-1700 Securities Trading Policy

Policy Number:	11-1700
Applies To:	All
Policy Owner:	Kate Schuelke
Current Revision Date:	02-MAR-2020
Previous Revision Date:	18-OCT-2017
Last Annual Review Date:	21-JAN-2020
Policy Effective Date:	15-MAY-1996
Accessible By:	All Employees

Executive Summary

Seagate is dedicated to compliance with applicable rules and regulations. This Securities Trading Policy provides guidelines and procedures with respect to the laws relating to transactions in securities, and the handling of material nonpublic information, of publicly traded companies, including Seagate. The laws and this Policy apply to everyone so it is the responsibility of each individual to act in a manner consistent with this Policy and the law.

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1. PURPOSE OF THE SECURITIES TRADING POLICY

Seagate Technology plc (including its subsidiaries, "Seagate") has adopted this Securities Trading Policy (this "Policy") to promote compliance with laws that prohibit individuals who are aware of material nonpublic information (defined below) about Seagate or another company from (i) trading in the securities of that company, or (ii) providing material nonpublic information to other individuals who may trade based on that information.

This Policy applies to all (i) Seagate employees, consultants, independent contractors, and members of the Board of Directors ("Directors"), as well as Family Members (defined below) (collectively, "Insiders") and (ii) trading involving Seagate securities or the securities of other companies about which you possess material nonpublic information obtained through your employment or engagement with Seagate or the other company. You are responsible for making sure that your Family Members also comply with this Policy and do not trade on any material nonpublic information.

Any violation of this Policy or securities laws may result in your immediate dismissal, and may subject you and any other individual involved to both civil and criminal penalties.

2. DEFINITIONS

A. Compliance Officers: The Chief Legal Officer and the Chief Financial Officer. Contact details may be found at <https://my.seagate.com/myseagate>. The Compliance Officers may appoint one or more designees to assist them in carrying out their responsibilities under this Policy.

B. Family Members: Members of your immediate family, individuals you share a home with, individuals that are your economic dependents, and any other individuals or entities whose transactions in securities you influence, direct or control. Some examples of Family Members are parents, siblings or children, regardless of whether they live with you; any venture or other investment fund that you influence, direct or control; or anyone who consults with you before they trade.

C. Management Insiders: Section 16 Insiders and Designated Insiders (each defined below) as a group.

- Section 16 Insiders. Seagate Directors and designated executive officers are deemed "Section 16 Insiders" because they are subject to the reporting provisions and trading restrictions of Section 16 of the Securities Exchange Act of 1934, as amended (the "Exchange Act") and the associated rules and regulations set by the Securities and Exchange Commission ("SEC"). These Section 16 Insiders also may be subject to additional trading restrictions, including the disgorgement of any profit earned on "short-swing" trading (in other words, a non-exempt purchase and sale, or a sale and purchase, of securities within a period of less than six months). Seagate will update its listing of Section 16 Insiders from time to time to reflect the addition, resignation or departure of Directors and designated executive officers.
- Designated Insiders. All employees who are vice president level and above, and other employees, consultants and

independent contractors who have frequent access to material nonpublic information concerning Seagate are designated as “Designated Insiders.” A Compliance Officer will notify the Designated Insiders that they have been so designated and are subject to trading restrictions, including preclearance requirements.

The Compliance Officers or their designees maintain a list of Management Insiders. If you have any questions about whether you are a Management Insider, please send an email to securities.trading@seagate.com to see if you are on the list.

D. Insider Trading: Insider trading occurs when a person (i) uses material nonpublic information to make decisions to purchase, sell or otherwise trade in a company’s securities; or (ii) gives material nonpublic information (called “tipping”) about a company to others who trade in that company’s securities. The prohibitions against insider trading apply to trading, tipping and making recommendations to trade by virtually any person, including all persons associated with the company, if the information involved is material and nonpublic. The prohibitions also apply regardless of whether the person tipping the material nonpublic information receives anything from or for the use of the information by the other person.

E. Material Nonpublic Information: Any information, positive or negative, that a reasonable investor would consider important in determining whether to buy, sell, or hold securities, that has not been widely circulated to the general public in a manner that complies with applicable securities laws (for example, by a press release or in a report filed with the SEC). A determination as to whether information is material or nonpublic depends on all of the related facts and circumstances.

It is not possible to list all types of material information, but the following are examples of the types of information that should be treated as material:

- financial forecasts or earnings estimates;
- changes in previously released earnings estimates;
- unannounced financial results;
- significant merger, acquisition or divestiture proposals or agreements;
- significant customer or vendor contracts;
- the potential gain or loss of a major customer or supplier;
- dividend changes;
- strategic plans;
- restructuring events;
- major product announcements;
- development of a significant new product, process or service;
- a significant cybersecurity incident, such as a data breach;
- regulatory investigations;
- major litigation;
- changes in debt ratings;
- analyst upgrades or downgrades;
- significant governmental investigations; and
- changes in senior management.

Material information does not have to directly relate to a company’s business. For example, information about the contents of a pending publication in the financial press that is expected to affect the market price of a security could be considered material. This means, if you think the information could affect the price of a security or it could reasonably make you or someone else want to buy or sell the security, you should consider it material. If you have a question about whether particular information is material or nonpublic, you should consult the Chief Legal Officer.

F. Security and Securities: Shares (common and preferred), share options, stock, warrants, bonds, notes, debentures, convertible instruments, put or call options (i.e., exchange-traded options), or other similar instruments.

G. Trade and Trading: Any purchase, sale or other transaction to acquire, transfer or dispose of securities, including, but not limited to: share option exercises, gifts, sales of shares acquired upon the vesting of share awards or exercise of options, and trades made under an employee benefit plan such as a 401(k) plan. You should note that there are no exceptions from insider trading laws or this Policy based on the size of the trade.

3. TRADING RESTRICTIONS FOR ALL INSIDERS

A. Prohibitions on Insider Trading and Tipping Information to Others

Seagate Insiders may not:

- purchase or sell (or otherwise trade) securities issued by Seagate, Seagate's competitors, customers or suppliers (including any company with which Seagate has or is pursuing a commercial relationship), or any other company while aware of material nonpublic information concerning Seagate or such other company when that information was obtained through your employment or other involvement with that company;
- disclose any material nonpublic information to persons within the company whose jobs do not require them to have that information, or outside the company to other persons unless such disclosure is made in accordance with Seagate's policies regarding the protection or authorized external disclosure of information; or
- make recommendations or express opinions on the basis of material nonpublic information regarding the purchase or sale of any company's securities.

Insiders may make charitable gifts at any time, subject to these prohibitions on trading on or tipping material nonpublic information.

This prohibition against trading on or tipping material nonpublic information applies to all Insiders at all times. You should consult a Compliance Officer whenever you are in doubt.

However, trades may generally be made under a preexisting written plan or arrangement complying with SEC Rule 10b5-1 (a "10b5-1 Plan") that is acknowledged in writing in advance by the Chief Legal Officer or his or her designee. Section 7 below provides more information on 10b5-1 Plans.

B. Other Prohibited Transactions for all Insiders

Seagate considers it inappropriate for Insiders to engage in speculative trades or certain other trading in Seagate securities that may lead to unintentional violations of insider trading laws or create a conflict of interest. Therefore, regardless of whether you know material nonpublic information, Insiders must not engage in any of the following trades in Seagate securities:

- buying or selling options, warrants, puts, and calls or similar instruments;
- short sales (i.e., selling shares that are not owned and borrowing the shares to make delivery);
- hedging or similar trades designed to decrease the risks associated with holding Seagate securities (including as part of a 10b5-1 Plan); and
- holding Seagate securities in a margin account or pledging Seagate securities as collateral for a loan.

These trades are prohibited because they may (i) result in trades taking place when you have material nonpublic information or are otherwise not permitted to trade under the terms of this Policy; (ii) create an appearance of impropriety if you could profit from poor company performance; (iii) reflect a short-term or speculative interest in Seagate's securities and create the appearance of impropriety, even where a trade is executed when you do not have material nonpublic information; or (iv) focus attention on short-term performance at the expense of Seagate's long-term goals. In addition, securities laws relating to derivatives trades are complex, and individuals engaging in derivatives trades may subject themselves to an increased risk of violating securities laws.

4. ADDITIONAL LIMITATIONS ON MANAGEMENT INSIDERS

A. Mandatory Preclearance of Transactions for Management Insiders

Management Insiders must obtain preclearance from a Compliance Officer prior to executing any trade in Seagate securities. This is true whether the trade is for the Management Insider's own account, one over which he or she exercises control, or one in which he or she has a financial interest. Preclearance is required not only for trades conducted by Management Insiders, but also for trades conducted by (i) a Management Insider's Family Member; and (ii) trusts, corporations, and other entities controlled by the Management Insider or the Management Insider's Family Member ("Controlled Entities").

A request for preclearance must be submitted in advance of the proposed trade, state the type and number or amount of securities being traded along with the date of the proposed trade, and confirm that the Management Insider does not have any material nonpublic information. Requests for preclearance must not be made when you are in possession of material nonpublic information.

Management Insiders, their Family Members and Controlled Entities may only trade after receipt of a notice of preclearance. Management Insiders, their Family Members and Controlled Entities must execute precleared trades within five (5) trading days following the date of the notice of preclearance, but in no event after the expiration of the applicable Window Period. If a preclearance expires before the precleared trade is executed, Management Insiders must submit a new preclearance request

and obtain a new preclearance. For purposes of this section, a partial trading day counts towards the five (5) trading days. If a Management Insider becomes aware of material nonpublic information before the precleared trade is executed, the preclearance becomes invalid and the trade must not be completed.

B. Trading Windows for Management Insiders

Management Insiders, their Family Members and Controlled Entities may only trade Seagate securities after obtaining the required preclearance. Preclearances for trades of Seagate securities will generally be granted only during a Window Period. Seagate has established four Window Periods during the fiscal year. During each Window Period, preclearance requests for any trades may be submitted and precleared trades may be executed. All precleared trades may only be executed during the Window Period in which the preclearance was granted.

Each "Window Period" begins on the second trading day after Seagate makes a public news release of its quarterly earnings for the prior fiscal quarter. If Seagate releases earnings before the NASDAQ market opens, that day will count as the first trading day, and the Window Period begins the next trading day. If Seagate releases earnings after the NASDAQ market opens, the next trading day will count as the first trading day and the Window Period begins the following trading day (in other words, the second trading day after earnings were released). Each Window Period ends at the close of the NASDAQ market on the twenty-first day prior to the last day of the current fiscal quarter. The Window Period will be deemed closed in accordance with the prior sentence unless specifically changed in a written notice from the Chief Legal Officer, or his or her designee.

After the Window Period ends, Management Insiders, their Family Members and Controlled Entities may not (i) purchase or otherwise acquire, transfer, or sell or otherwise dispose of any Seagate securities except under a 10b5-1 Plan established during an open Window Period and acknowledged by the Chief Legal Officer in advance (see Section 7 below), or (ii) submit any preclearance request for any trades until the following Window Period.

Subject to the prohibitions on trading on or tipping material nonpublic information in section 3.A., Management Insiders, their Family Members and Controlled Entities may only gift Seagate securities after obtaining a Compliance Officer's approval under this Policy.

Window Periods and obtaining preclearances for trades are Seagate compliance requirements and do not constitute a legal right to trade in Seagate's securities. The prohibition against trading on or tipping material nonpublic information applies at all times, even during a Window Period and even if you obtained a preclearance. You should consult a Compliance Officer whenever you are in doubt.

C. Share Option Exercises by Management Insiders

Despite the restrictions in this section 4, Management Insiders may exercise options granted to them by Seagate at any time. However, a Management Insider may only sell shares acquired upon the exercise of such an option during a Window Period, and only if they do not have any material nonpublic information. In accordance with section 5 below, Management Insiders may exercise options granted to them by Seagate using cash or a check if they continue to hold the shares (an "exercise-and-hold" transaction). However, any cashless exercise of an option through a broker (since this involves selling a portion of the underlying shares to cover the costs of exercise) or any other market sale for the purpose of generating the cash needed to pay the exercise price of an option must be made during a Window Period or under a 10b5-1 Plan.

5. EXCEPTIONS TO TRADING PROHIBITIONS FOR ALL INSIDERS

This Policy's prohibitions on trading do not apply to:

- the transfer of securities to an entity that involves a simple change in the way you own the securities (for example, to an inter vivos trust of which you are the sole beneficiary during your lifetime);
- any exercise of a tax withholding right where you have elected to have Seagate withhold shares;
- the purchase of shares through Seagate's employee share purchase plan (see section 6.B below);
- receipt and vesting of stock options, restricted stock units, restricted stock or other equity compensation awards from Seagate;
- trades made under a valid 10b5-1 Plan (see section 7 below); and
- exercises of stock options through an exercise-and-hold trade where the exercise price is paid in cash or by check and you continue to hold the shares.

6. ADDITIONAL RESTRICTIONS ON ALL INSIDERS

A. Special Blackout Periods

From time to time, Seagate may impose a special blackout period, or suspend trading, in Seagate securities on certain Insiders because of developments that have not yet been disclosed to the public. These Insiders may not trade in Seagate securities while the special blackout period is in effect, or disclose to others (including other Insiders) the fact that a special blackout period is in effect. Although these special blackout periods may often arise because Seagate is involved in a confidential transaction or matter, they may be declared for any reason. If Seagate imposes a special blackout period on you, a Compliance Officer will notify you when the special blackout period begins and ends. You must treat the declaration of a special blackout period as confidential information.

B. Restrictions Following Termination of Employment or Service

This Policy will continue to apply to you for a period of time after your employment with or service to Seagate terminates. The securities laws apply at all times regardless of whether you are employed with or providing services to Seagate. If you are in possession of material nonpublic information, you must not trade in securities until that information has become public or is no longer material, regardless of whether your employment or service has terminated.

If you are a Management Insider, upon termination of your employment with or service to Seagate, you are no longer required to engage in trades in Seagate securities exclusively during a Window Period, but all other aspects of this Policy (including mandatory preclearance of any trades in Seagate securities) shall apply until the later of (i) the commencement of the Window Period following the public release of earnings for the fiscal quarter in which your employment with or service to Seagate terminates; or (ii) the beginning of the second market trading day after the earlier of (a) the public disclosure of any material nonpublic information you know, or (b) such time as any material nonpublic information you know is no longer material. If you have any questions about whether you are permitted to trade, you should consult the Chief Legal Officer.

C. Note on Employee Share Purchase Plan ("ESPP") Shares

All Insiders may participate in Seagate's ESPP to purchase Seagate shares, however, such shares must not be sold at a time when you have material nonpublic information. In addition, Management Insiders may not sell any ESPP shares outside of a Window Period.

7. ADOPTION OF 10B5-1 TRADING PLANS

Rule 10b5-1 under the Exchange Act provides a defense against an allegation of insider trading if you enter into a contract, provide instructions, or adopt a written plan for trading securities when you are not aware of material nonpublic information. The 10b5-1 Plan must (i) specify the number or amount, price and date of the trade; (ii) specify an objective method for determining the number or amount, price and date of the trade; or (iii) place any subsequent discretion for determining the number or amount, price and date of the trade in another person or broker who is not, at the time of the trade, aware of material nonpublic information. The 10b5-1 Plan must not permit you to exercise any subsequent influence over how, when, or whether the securities trades are made.

If you enter into a 10b5-1 Plan, your 10b5-1 Plan should be structured to avoid any trades shortly before known scheduled announcements, such as quarterly earnings announcements. Even though trades executed in accordance with a properly formulated 10b5-1 Plan should generally be construed as not occurring on the basis of material nonpublic information, trades that occur shortly before Seagate announces material news can attract negative attention from the public and media, who may not understand the nuances of trading under a 10b5-1 Plan. This could result in negative publicity for you and Seagate if the SEC or NASDAQ were to investigate your trades.

All 10b5-1 Plans must be acknowledged by the Chief Legal Officer, or his or her designee, before you begin trading under the plan. A request for acknowledgement of a 10b5-1 Plan must be submitted at least five (5) business days in advance of the date you intend to enter into the 10b5-1 Plan. As mentioned above, you may only request acknowledgment of and enter into a 10b5-1 Plan when you do not have any material nonpublic information. The first trade under a 10b5-1 Plan may not occur until at least thirty (30) days following the date the 10b5-1 Plan was entered into (i.e., signed by the parties and acknowledged by the Chief Legal Officer), and the waiting period may be greater, depending upon the facts and circumstances at the time of acknowledgment or at the Chief Legal Officer's sole discretion.

In addition, if you are a Management Insider, a 10b5-1 Plan may only be entered into during an open Window Period and when you are not in possession of material nonpublic information.

Once entered into, a 10b5-1 Plan may not be modified unless such modifications are notified to and acknowledged in advance by the Chief Legal Officer, or his or her designee. Any modification to a 10b5-1 Plan may only be made when you do not have any material nonpublic information and, for Management Insiders, during a Window Period. Additionally, for Management

Insiders, the first trade under the modified 10b5-1 Plan may not occur until the next quarterly Window Period opens following adoption of the modification.

If you cancel or otherwise terminate a 10b5-1 Plan during its term, you will be precluded from establishing another, separate 10b5-1 Plan until the term of the original 10b5-1 Plan has lapsed. During this time, if you are a Management Insider, you will be required to preclear trades in accordance with section 4 above. Any and all Insiders may only have one 10b5-1 Plan in operation at any time.

The SEC rules regarding 10b5-1 Plans are complex and must be complied with completely to be effective. The description in this section 7 is only a summary, and Seagate strongly advises that you consult with your personal legal advisor if you intend to adopt a 10b5-1 Plan. While 10b5-1 Plans are subject to review and acknowledgement by Seagate, you are ultimately responsible for making sure your 10b5-1 Plan complies with Rule 10b5-1 and ensuring that it complies with this Policy.

8. POLICY COMPLIANCE, INTERPRETATION AND AMENDMENTS

All Seagate Insiders are required to comply with this Policy and the securities laws. Any violation may result in immediate dismissal and serious civil and criminal penalties. You should direct any questions on this Policy to a Compliance Officer. You should not try to resolve any uncertainties on your own.

The Compliance Officers, individually or jointly, are responsible for interpreting and updating this Policy as required and may authorize deviations in the procedures in this Policy, provided that those deviations are consistent with the stated purpose of this Policy and applicable securities laws. Any deviations must be confirmed in writing. Any material amendment to the terms of this Policy must be approved by the Chief Legal Officer. Compliance with this Policy or any approved deviations should not be considered a "safe harbor", and all Insiders should comply with insider trading and other securities laws and use good judgment at all times.