<u>Seagate Technology Anti-Slavery and Human Trafficking Statement</u>

The California Transparency in Supply Chain Act of 2010 and the United Kingdom Modern Slavery Act of 2015 requires certain companies to disclose annually their efforts to eradicate slavery and human trafficking from their supply chains. This statement is set out in response to these requirements and to demonstrate to our stakeholders the efforts undertaken by Seagate Technology and applicable group companies such as LaCie Ltd., Seagate Technology (Ireland), Seagate Technology (Netherlands) B.V. and Seagate Systems (UK) Ltd. which join in publishing this statement, to prevent slavery and human trafficking in our business and Supply Chain. This statement relates to actions and activities during the financial year ended June 30, 2020 for LaCie Ltd., and Seagate Systems (UK) Ltd. and July 3, 2020 in respect of Seagate Technology (Ireland) and Seagate Technology (Netherlands) B.V.

Seagate is an international business with major operations in six countries spanning North America, Asia, and Europe. It delivers word-class, precision-engineered data solutions developed through sustainable and profitable partnerships. Our organization is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

We believe that all workers have the right to voluntary employment, a workplace free of harassment and unlawful discrimination, and to join or be represented by workers councils or labor unions in accordance with local laws. Our established policies, including our global Human Rights policy and Code of Conduct, communicate the company's position and expectations for conformance to Seagate employees and other stakeholders. Employee conformance with Seagate's Code of Conduct and other company policies is enforced by our global Human Resources Coaching and Discipline Policy.

Our supply chain success is underpinned by supplier education, supplier management and supply chain transparency to ensure fair treatment of people and resources.

We work with hundreds of suppliers across the globe who supply products, materials and services. Our suppliers include consultants, contractors, distributors, manufacturers and more. Seagate has two types of suppliers: direct, which provide components and parts for products; and indirect, which provide products and services to support operations.

Seagate is committed to the tenets of the Responsible Business Alliance (RBA) Code of Conduct (Code), formerly known as the Electronics Industry Citizenship Coalition (EICC), and adopted the Code as its supplier code of conduct in 2007. Over the past decade, we have engaged with suppliers to drive responsible, sustainable business practices that align with Code standards on the avoidance of child and forced labor among others.

Seagate's Supply Chain management framework, which follows RBA guidelines, includes:

Procurement Staff Training

- We continuously educate employees involved in Supply Chain Management about the Code, using internally developed material and RBA courses, which includes content about child and forced labor, and slavery.

Supplier Agreements

- Suppliers are required to acknowledge and operate within Code requirements, which prohibit child and forced labor.
- We require suppliers to comply with Seagate's Responsible Sourcing of Minerals Policy, which prohibits the use of tin, tungsten, tantalum, or gold 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 about 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 FY2020, Seagate conducted a number of supplier education and trainings, ranging from one-on-one sessions to small groups and webinars. Seven webinar sessions were conducted during the year to increase the knowledge of suppliers on key topic areas including supply chain risk assessment, forced labor and labor challenges during a pandemic. There were over 350 participants at these webinars.

Supplier Risk Assessments

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 ensure sufficient controls are in place. To do this, supplier compliance is periodically validated using the RBA's third-party audit Validated Audit Program (VAP). These announced, prearranged audits review compliance with the Code and local regulations, and include an assessment of child and forced labor. Forty two supplier VAP audits and twenty two supplier closure VAP audits were conducted during the fiscal year. Supplier audits were impacted by COVID-19 restrictions during the second half of the fiscal year.

Risk Assessment and Mitigation

Seagate remains vigilant to the risk of child labor and 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, seven supplier 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, remediation plans were developed to reimburse the fees paid to the affected workers. At the end of the fiscal year over USD 2.28 million was reimbursed to over 2900 workers in our supply chain. We continue to work with our suppliers to complete the remediation plan and introduce improved controls during the hiring process to ensure foreign migrant workers do not pay any fees.

Performance Indicators

Our Global Citizenship Annual Report provides details of our Supply Chain program activities, performance and plans for the coming year.

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*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,

Gianluca Romano

Date 1 2

November, 2020