

## **2023 Report on Fighting Against Forced Labour and Child Labour in Supply Chains**

This report is submitted by Seagate Technology LLC (“Seagate LLC”) in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for Seagate LLC’s most recently completed fiscal year, which ended June 30, 2023.

### **Our Structure, Activities and Supply Chains**

Seagate LLC is a limited liability company incorporated in the state of Delaware. It is part of a group of companies ultimately controlled by Seagate Technology Holdings Public Limited Company, a publicly listed company (collectively, “Seagate”, “we” or “our”). Seagate is an international business with major operations in six countries spanning North America, Asia, and Europe. It delivers world-class, precision-engineered data solutions developed through sustainable and profitable partnerships. In Canada, Seagate LLC is engaged in the import of Seagate’s branded products into Canada and enters into agreements with third party retailers for the distribution of our products across Canada. As a subsidiary of Seagate, Seagate LLC, has implemented Seagate’s human rights policies and procedures, which are discussed herein. Our organization is absolutely committed to preventing forced labour and child labour in its corporate activities and to ensuring that its supply chains are free from forced labour or child labour.

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 labour 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 help 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 is committed to the tenets of the Responsible Business Alliance (RBA) Code of Conduct (Code) 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 labour 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 labour, and slavery.

#### **Supplier Agreements**

- As a general practice, Seagate includes in its template agreements with suppliers involved in the design or manufacture of Seagate products shipped into Canada a prohibition against child and forced labour.

- 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 labour.

### **Events**

During FY2023, Seagate conducted several supplier education and training courses, ranging from one-on-one sessions to small groups and webinars. Six webinar sessions were conducted during the year to increase the knowledge of suppliers on key topic areas including responsible sourcing of minerals, forced labour and RBA Code implementation. There were over 300 participants at these webinars.

### **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 help 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 labour. Seventy supplier VAP audits and twenty supplier closure VAP audits were conducted during the fiscal year.

### **Risk Assessment and Mitigation**

Seagate remains vigilant to the risk of child labour and forced labour within our supply chain. The highest risk of forced labour in our supply chain is where foreign migrant labour 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 labour 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 labour 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 1,100,000 was reimbursed to over 3000 workers in the supply chain in FY2023. We continue to work with our suppliers to complete the remediation plan and introduce improved controls during the hiring process to help ensure foreign migrant workers do not pay any fees.

## Remediation

To the best of Seagate LLC's knowledge, Seagate's general forced and child labour risk mitigation and remediation efforts, described above (see Risk Assessment and Mitigation) have not resulted in any loss of income to the most vulnerable families.

## Key Performance Indicators

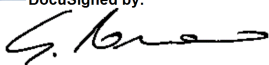
In addition to the staff and supplier education and training described above, our ESG Performance Annual Report provides details of our supply chain program activities, and performance and plans for the coming year. In fiscal year 2023 our supplier RBA VAP audit closure rate for priority and major findings was 84.5% for working hour related findings and 91.9% 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 labour.

## Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, by the managing member of Seagate Technology LLC.

I have the authority to bind Seagate Technology LLC

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**Full name:** Gianluca Romano

**Title:** Chief Financial Officer of Seagate Technology (US) Holdings, Inc, the managing member of Seagate Technology LLC

**Date:** May 28, 2024