



Human Rights Policy



As a global industry leader, Seagate is committed to upholding human rights and labor standards in today's dynamic global landscape. In partnership with employees, community members, customers, suppliers, and other stakeholders, our commitment to being a good corporate citizen 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*). Seagate is also a signatory to the Responsible Business Alliance Code of Conduct and has adopted the code as its supplier code of conduct.

Respectful and Inclusive Workplace. Inclusion is one of our core values. We strive to treat everyone fairly and equitably. We respect and value people for their talent, contributions, and potential. Seagate does not tolerate harassment or discrimination of any kind. This includes actions by or against any Seagate team member or third party. We expect everyone to treat others with dignity and respect.

We respect religious diversity and employees may be provided with reasonable accommodations for religious practices, upon request. Seagate is also committed to providing reasonable accommodations to job applicants and employees with disabilities or who are pregnant in compliance with applicable laws. Any requests for reasonable accommodation should be directed to Site Human Resources or HR Central.

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 status protected by applicable federal, state, or local 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 believe in fair and equitable pay for all employees, reflecting our DEI commitments and value of integrity. 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. 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. Our overtime policy is voluntary, aligns with applicable pay regulations, and complies with local laws and safety practices. We incorporate comprehensive measures for meal and rest breaks, conforming to local regulations. 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 from lawfully exercising such rights. Seagate will not interfere with or finance trade unions. 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. In situations where freedom of association is constrained by applicable laws, employees are permitted to elect and join alternative lawful forms of worker representations.

Prohibition of forced labor. We firmly prohibit any form of human trafficking or modern 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. We safeguard workers' freedom of movement and ensure the overall terms of employment are voluntary, fostering a workplace environment free from coercion or exploitation. We will not withhold an employee's government-issued identification upon hire. We strictly prohibit recruitment fees, and if any such fees are found to have been paid by workers, we ensure they are promptly repaid to the impacted workers.

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 complements their education. Hired interns shall not be used to address labor shortages. Seagate does not offer any type of apprentice program or hire student workers other than those that meet the criteria for the intern program. Seagate does not use agencies or intermediaries in connection with the recruitment, hiring, arrangement, and management of student workers, interns, or apprentices.

Human Rights Due Diligence and Management Systems:

Risk Assessment: Seagate conducts assessments of human rights-related risks and potential impacts in connection with our policies, practices and management approach, at regular intervals and whenever appropriate based on circumstances or reports.

Grievance Mechanisms: Seagate is committed to promoting and fostering open dialogue between employees and supervisors/managers. If employees have concerns or complaints, they are encouraged to raise them with their supervisor. Employees should also speak with a supervisor or HR representative immediately if they are aware of an illegal or unethical situation in the workplace. Additional avenues for reporting concerns include informing a Seagate Compliance Officer, the Legal department, or for interested parties, through our global Ethics Helpline. Seagate does not allow retaliation against anyone who reports concerns in good faith.

Remedies: If Seagate learns of human rights abuses or other conduct contrary to our policies committed by our employees or suppliers, we will take remedial action proportionate to the offense. Such remediation may include investigating, establishing a corrective action plan, requiring additional audits, possible suspension or termination of the relationship, and providing support to the affected parties as needed.

For additional information, visit [ESG at Seagate](#).

*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.*



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