

Seagate Technology Anti-Slavery and Human Trafficking Statement

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 in response to these requirements and to demonstrate to our stakeholders, efforts undertaken by Seagate Technology and applicable group companies such as LaCie Ltd. and Seagate Technology (Ireland), which join in publishing this statement, to prevent slavery and human trafficking in our business and Supply Chain.

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.

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 Business Conduct, communicate the company's position and expectations for conformance to Seagate employees and other stakeholders. Employee conformance with the Seagate Code of Business 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 an RBA course, 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 Conflict-Free 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 been trained by Seagate Commodity Managers about Code requirements, using internally developed materials. These Suppliers are required to use the training in their organizations to drive awareness and conformance with the Code. Completion of the training is tracked by the Compliance Manager tool. Supplier training programmes are organized in high risk geographies to build supplier knowledge in the area of Child and Forced Labor.

Events

During FY2017, Seagate conducted a number of supplier education and trainings, ranging from one-on-one sessions to small groups and webinars. One of the most prominent trainings led was on the topic of Forced Labor in Thailand, in collaboration with HP, Intel, and WD. Over 60 participants attended the two-day training, and we received positive feedback from the participants. Given forced labor issues have become a new and emerging concern for electronics factories in Thailand, the aim of the training was to build awareness among suppliers and provide them with the tools to carry out assessments at their sites.

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.

Risk Assessment

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 labor is utilized; suppliers in Malaysia, Thailand, and Singapore 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.

Performance Indicators

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

*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,



Kathryn R. Scolnick

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