



January 2022

# Code of Conduct



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Nothing is more important to me personally than creating and maintaining an environment of honesty and integrity and I hope each and every one of you will embrace the principles of our Code of Conduct.”

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Welcome from Dave Mosely, CEO

## Dear Colleagues,

Our products are deeply embedded in the human experience. Data is in our DNA and we are poised to witness a proliferation of data across the globe. With the privilege of creating space for the human experience comes the great responsibility of doing so in alignment with our core values of honesty, integrity and respect for our fellow workers. Our Code of Conduct is the guiding principle that provides a roadmap on how to conduct our business with the highest levels of honesty and integrity. In our Code of Conduct, we not only declare our highest ethical standards and our unwavering commitment to integrity, but more importantly, our Code serves as a guide in our daily decision-making challenges.

I’m deeply committed to upholding our values and conducting our business with the highest ethical standards. I encourage each and every one of you to read our Code of Conduct carefully and refer to it often for guidance to shape your words and actions at Seagate. Together, we will continue to shape the Seagate tradition of excellence and empower people to do the right thing. Thank you.

A handwritten signature in black ink that reads "W. Mosely".



# Purpose and Scope

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Our core values of Integrity, Innovation, and Inclusion drive Seagate's culture, vision, and mission. This Code of Conduct ("Code") reflects our values. It guides how we treat others, make decisions, and conduct business around the world.

## Purpose

This Code embodies Seagate's core values and should be used as the foundation for conducting business and making decisions on Seagate's behalf.

## Scope

This Code applies to all employees, officers, members of our Board of Directors, contractors, temporary employees, and interns (collectively, "Seagate team members").



# Details

# Details

This Code applies to all Seagate team members. We expect everyone to know the Code and to be honest and ethical in fulfilling their duties.

Failure to do so can result in disciplinary action, which may include termination of employment or services, or removal from the Board of Directors. Civil or criminal penalties, including significant fines and imprisonment, may also result from not following this Code or the law. All waiver requests will be reviewed by the Conflict of Interest Review Committee. Executive officer or member of the Board of Directors waiver requests must be approved by the Board of Directors. Any other waiver requests must be approved by the Conflict of Interest Review Committee.





# Accountability

# Accountability

## Asking Questions and Reporting Concerns

1

Do you have a question or concern about this Code?

2

Do you believe someone may be violating the Code or the law?

3

Do you suspect unethical conduct?  
Are you not sure what to do?

Please contact any of the following resources if you answered yes to any of these questions:

- Your manager
- Any manager you trust
- Any Compliance Officer
- Any member of the Legal Department
- Any Human Resources representative
- Seagate's [Ethics Helpline](#)
- Your Regional [Ethics Helpline](#)  
(select country for phone numbers)



You can call our **Ethics Helpline** to make an anonymous report if local law permits anonymity. An independent third-party provider answers all **Ethics Helpline** calls 24 hours a day, 7 days a week.

For more information: [seagate.alertline.com](https://seagate.alertline.com)



**B.S. Teh**

*Senior Vice President of  
Global Sales and Sales  
Operations*

Do not be afraid to:



We should all follow this Code and encourage others to do the same.

## No Retaliation

Seagate does not allow retaliation against anyone who reports concerns in good faith. This is true even if it is later determined that no violation occurred. Seagate also prohibits retaliation against anyone as a result of their good faith participation in an investigation. Retaliation includes firing, suspending, harassing, demoting, disciplining, discriminating against or intimidating someone.



### **Patricia Frost**

*Senior Vice President of  
Human Resources, Internal  
Communications and  
Community Engagement*

Anyone violating our no retaliation policy will be subject to disciplinary action. Such disciplinary action may include termination, with or without notice, as allowed by applicable laws. In addition, where an investigation results in a determination that a Seagate team member has violated this Code or any other Seagate policy, this provision does not prohibit Seagate from taking disciplinary action, including termination of employment or contract, against such Seagate team member even if that person has participated in good faith in the investigation.

## Investigation and Discipline

Seagate will review all reports of violations of our Code, our policies, and the law. The reports remain confidential to the extent allowed by law or other rules. An investigation may be necessary to determine the appropriate resolution to a reported violation. You must not alter or destroy anything in response to an investigation. Making a malicious or intentionally false report or accusation is considered misconduct under this Code. Anyone violating our Code will be held accountable and disciplined as appropriate. Compliance Officers can help you interpret our Code.

**For more information:**  
**[10-2200 Global Investigations Policy](#)**

## Exceptions and Waivers

A waiver may be necessary in certain circumstances. A Compliance Officer can help determine if a waiver is necessary and assist with the waiver process. You must get your waiver approved before taking any action. No one can approve their own waiver request. An executive officer or member of the Board of Directors waiver must be approved by the Board of Directors. Waivers for all other Seagate team members must be approved by the Conflict of Interest Review Committee.



# Obey the Law

# Obey the Law

Integrity is a core value at Seagate. You should understand and follow all laws, rules, and regulations that apply to your work.

Do not engage in illegal activities at work or use Seagate resources inappropriately (for example, do not look at pornography or material that is illegal, harassing or offensive on your Seagate laptop). Certain conduct may be legal but would violate this Code. Follow this Code if you are in this situation. If a law is more restrictive than this Code, you must obey the law.

Contact a **Compliance Officer** if you have questions or are unsure of what to do.



**Laurie Webb**

*VP, Legal and Chief  
Compliance Officer*

**Some laws are easy to violate if you are not careful. Here is an overview of some of these laws and advice on how to follow them:**

## **Competition and Antitrust Laws**

Antitrust and competition laws protect consumers and competitors from unfair business practices. These laws protect fair competition. Seagate is committed to obeying applicable competition and antitrust laws.

**These laws vary from country to country, but they generally prohibit:**

- Making agreements with competitors that restrain trade
- Vertical price-fixing or resale price maintenance
- Abusing market power to unfairly disadvantage competitors
- Allocation of markets or customers

- Structuring or making bids to direct a contract to a certain re-seller or competitor (also known as “bid rigging”)
- Boycotting specified suppliers or customers
- Limiting product sales or production for anti-competitive reasons



**Antitrust and competition laws also prohibit deceptive practices, which include:**

- Giving false or misleading statements about Seagate’s products or services
- Making false unfavorable statements about a competitor or its products
- Presenting unsubstantiated product claims
- Using another company’s trademarks in a way that causes the customer to be unsure of the source of the product

If you become aware of or anyone proposes these practices or other anti-competitive conduct, say “no” to taking part in those activities. Immediately contact the Legal Department, a [Compliance Officer](#) or the [Ethics Helpline](#). Violating antitrust or competition laws may result in civil and criminal penalties, including monetary fines and imprisonment.

**For more information:  
[11-1800 Antitrust Policy](#)**



# Anti-Bribery and Anti-Corruption

At Seagate, our rule is simple—do not bribe anyone, at any time, for any reason. Obey anti-bribery and anti-corruption laws. Giving, or promising to give, anything of value to get an improper advantage is a bribe. A donation could also be a bribe if it is given to influence a decision for Seagate.

Giving or receiving business courtesies, gifts, or entertainment is a common business practice. This exchange could be with a customer, supplier, or other third party. This may create the appearance of something improper. Always ensure our Code and applicable law permits any gift or entertainment given or received before making the exchange. If you are unsure, contact a [Compliance Officer](#) before you give or receive anything of value.

Interacting with government officials presents unique challenges. The laws governing such interactions are complex and violations could result in serious criminal and civil penalties. Penalties may include significant fines and imprisonment.

You must get approval from a [Compliance Officer](#) before offering anything to a government official, including meals and entertainment. Approval is also required before giving anything to an official's family members.

You should contact a [Compliance Officer](#) for more information about interacting with government officials. Report observed or suspected corrupt conduct to a [Compliance Officer](#) or the [Ethics Helpline](#).

**For more information about our anti-bribery and anti-corruption rules, including those governing gifts and courtesies:  
[11-1200 Global Anti-Bribery and Anti-Corruption Policy](#)**

# Insider Trading

Do not use material, non-public information to buy or sell securities (for example, Seagate stocks or bonds). Do not pass material, non-public information to others so that they may buy or sell securities. Seagate team members can only use confidential information for business purposes. “Material” information is information that a reasonable person would consider important when deciding to buy, sell or hold securities.



**Gianluca Romano**

*Chief Financial Officer (CFO)*

**Non-public information that could be considered material includes but is not limited to the following:**

- Financial results that have not been publicly disclosed
- Earnings information that has not been publicly disclosed
- Financial forecasts
- Potential gain or loss of a major customer, supplier, or contract
- Significant mergers, acquisitions, or sales of assets
- Major litigation
- Major new or existing product announcements
- Strategic plans
- Changes in top management
- Marketing plans

**For more information:  
11-1700 Securities Trading Policy**

# International Trade

U.S. and international trade laws control where we can send or receive our products and services.

## These laws are complex and apply to:

- Importing and exporting goods or services to or from the United States and other countries
- Exporting technical data, especially data originating in the U.S. Keep in mind that access of technical data by a foreign national (i.e., a citizen of a country other than the country where the technical data originated) is considered to be an export.

You may need to get an import or export license to comply with trade laws. When filling out documentation, do not make any false or misleading statements. Some countries may prohibit commercial transactions with certain countries, persons, or groups for national security reasons or trade protection.

Work with your manager and Seagate's International Trade Group to ensure your transaction complies with applicable laws. Violation of trade control laws could have serious consequences for Seagate. These consequences include audits, fines, trade constraints, and loss of business.

**For more information:**

**[08-3005 International Trade Compliance Policy](#)**



# Data Privacy

Seagate is committed to responsibly handling personal data under applicable privacy laws. Our policies give specific guidelines about safeguarding personal information we handle. They define how you can collect, process, maintain,



share, and dispose of personal data. You are responsible for knowing and performing your obligations under these policies.

## When handling personal data in your job:

- Only collect personal data that Seagate needs
- Protect it
- Access only what you need
- Work with business partners who share our commitment to privacy
- Escalate concerns or threats to the security of personal data

For more information:

[Global Privacy policies](#) and [Privacy Statement](#)



# Respect Others

# Respect Others

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.



# Anti-Harassment / Anti-Discrimination

Harassment is any conduct that makes the work environment intimidating, offensive or hostile. This unwelcome conduct could be physical, verbal, or visual. Examples of harassment include bullying, shouting, offensive jokes and pictures. Additionally, sexual comments, inappropriate touching, and requests for sexual favors are examples of sexual harassment.

We are a global company and our employees represent a wide range of backgrounds and cultures. Our diversity gives us perspectives and ideas that help us think big. This enables our future business success. We hire, promote, and compensate employees based on performance, skills, abilities, and any other legally permitted or required criteria.

Discrimination is the unfair or prejudicial treatment of another. **Discrimination is never permitted on the basis of protected personal characteristics, including:**

- 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 (male or female), gender identity (our internal sense of our gender) and gender expression (how our behavior, appearance and interests reflect our gender)
- 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

Seagate is committed to fostering an inclusive and diverse workplace. We want all employees to feel comfortable to be themselves and do their best work. While anti-harassment and anti-discrimination laws vary in the countries in which we operate, we hold all sites to the same standard under this Code.

Tell your manager or HR representative if you are harassed, discriminated against, or witness such behavior. You may also contact the Ethics Helpline.

**For more information:**

**06-8008 Harassment Free Workplace Policy**  
**06-1045 Equal Employment Opportunity Policy**



# Workplace Safety

## Site Safety

Seagate's safety and wellness programs focus on accident prevention and employee well-being.

### This means:

- Follow site safety rules
- Use necessary safety equipment
- Report actual or potential hazards



## Violence-free workplace

Seagate prohibits violence of any kind. You must not threaten or commit any act of violence at Seagate, with Seagate equipment, or while on duty regardless of the location. It is inappropriate to even joke about workplace violence.

Your personal safety is important to us. If you think you or others are in danger, try to move to a safe location or shelter in place. Report the danger by contacting local Security or law enforcement. If you are in a location without local security, contact local law enforcement. Tell your manager and/or HR representative when it is safe to do so.

If you have concerns about potential workplace violence or if someone has threatened you, notify Human Resources, the [Ethics Helpline](#), or Security.

For more information:

[06-8085 Violence-Free Workplace Policy](#)

## Drug-free workplace

You must not be under the influence of, in possession of, or distribute illegal drugs. With the exception of lawful and prudent alcohol consumption during legitimate business entertainment, you must not be under the influence of alcohol or drugs while working at Seagate or engaging in any Seagate business. At Seagate-sponsored social events, the reasonable drinking of alcohol is permitted if the vice president of the hosting functional organization has given their approval.

Speak with your manager if you must use any medication that has safety warnings that may impact your job function.

**For more information:**  
**[06-8002 Alcohol and Drug-Free Workplace Policy](#)**

## Coworker Relationships

Romantic or family relationships between coworkers can raise concerns regarding favoritism, confidentiality or security, or create an actual or perceived conflict of interest. This is especially true if the relationship is with a coworker or someone in your subordinate or supervisory chain. A change in work arrangements may be required in certain circumstances to mitigate actual or perceived conflicts of interest or to address other concerns. This could include reassignment or termination of employment for either or both individuals involved, depending on the circumstances.

**Consult [06-8011 Relationships at Work Policy](#) for further information regarding coworker relationships.**



# Avoid Conflicts of Interest

# Avoid Conflicts of Interest

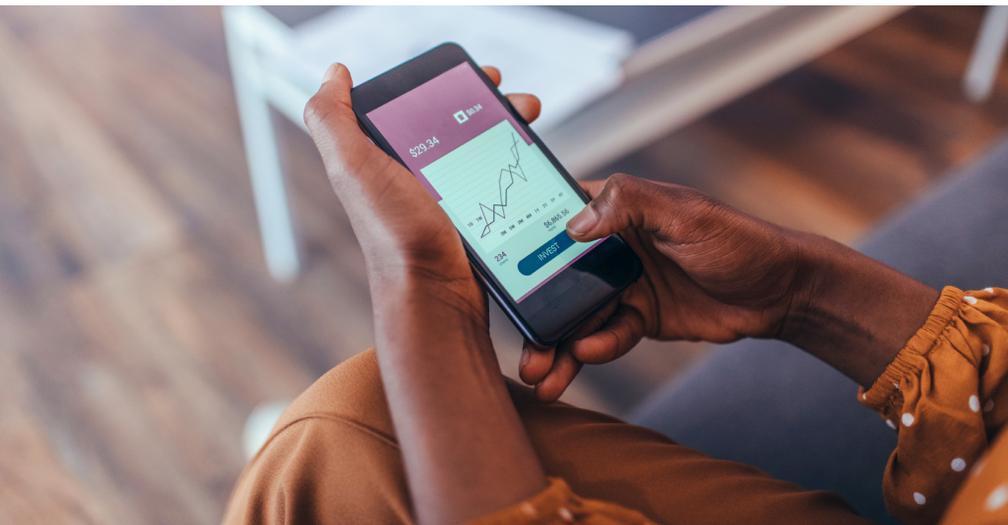
Each of us must avoid conflicts of interest as well as situations that give the appearance of a conflict. A conflict of interest may occur when a business situation presents competing loyalties. This could cause you to seek a personal benefit for yourself, your friends, or family at Seagate's expense. In some cases, just the potential for or appearance of a conflict can be a problem. You must disclose any actual or potential conflicts of interest when they occur. You must also update your disclosure whenever circumstances change. The disclosure form and additional information regarding the disclosure process can be found on the [Ethics and Compliance website](#).

**Please contact your manager, HR Representative or [Compliance Officer](#) for more information.**

## **Guidance for Common Scenarios of Potential Conflicts of Interest**

It is difficult to identify all possible conflicts of interest, but below is guidance for certain situations where conflicts of interest may arise.

For more information regarding conflicts of interest, visit the [Ethics and Compliance site](#) or contact one of our [Compliance Officers](#). If you have a possible conflict, please submit a [Potential Conflict of Interest Disclosure form](#) as soon as possible.



## Personal Investments

Avoid investments by you or your family members that could cause you to act in a way that is harmful to Seagate. One potential conflict is investments in private companies that are Seagate's competitors, customers, suppliers, partners, or potential acquisition targets. Another potential conflict is any direct investment in a public company that exceeds 1% of its outstanding equity. Investments by family members meeting these criteria that could be attributed to

you are also potential conflicts. Holdings in mutual funds, index funds, or Exchange Traded Funds (ETFs) are not direct investments and are not subject to disclosure as a potential conflict of interest. You must not attempt to evade investment restrictions by acting indirectly through someone else.

## Outside Employment or Directorships

If you work outside of Seagate, ensure that this does not adversely affect your performance at Seagate or create a conflict of interest. This includes serving as an advisor, director, consultant, or employee for another enterprise. Disclose anything that creates an actual or potential conflict of interest with your work at Seagate. Written approval by Seagate's Conflict of Interest Review Committee is required, for example, before you can accept any role with a competitor or company seeking or conducting business with Seagate.

## **Inventions**

It may create a conflict of interest if you develop outside inventions related to anything Seagate does or plans to do. Developing includes helping others to develop things related to existing or anticipated business. All employees are subject to our At-Will Employment, Confidential Information and Invention Assignment Agreements.

**For more information:**

**11-1900 Right to Intellectual Property Resulting from  
Work Performed for Seagate Policy**  
**11-1090 Invention Assignment and Inventor  
Recognition Policy**

## **Diverting Business Opportunities**

You have a duty to advance Seagate's legitimate interests to the best of your ability. Do not compete with Seagate or use Seagate property, information, or your position with Seagate for personal gain. Never take any business or investment opportunity away from Seagate without first presenting that opportunity to Seagate. Additionally, never help anyone, including family members, take business or investment opportunities away from Seagate for personal gain.

## Participating in Trade and Industry Associations and Technical Standards Groups

Participating in trade associations or standards setting organizations in your personal capacity may conflict with your Seagate duties, including your responsibility to protect Seagate's intellectual property and proprietary information. You must fill out the [Potential Conflict of Interest Disclosure form](#) and obtain written approval from Seagate's Conflict of Interest Review Committee before you, in your personal or professional capacity, join a trade association or engage in activities related to technical standards.

Even in your professional capacity as Seagate's representative, participating in trade associations or standards setting organizations can raise intellectual property and antitrust issues. As such, your manager and the Legal Department must be made aware when you join any such organization or working group, and when you contribute technology to a standard or use a standard in the development of a Seagate product.





# Protect Our Assets

# Protect our Assets

You are responsible for protecting all Seagate assets entrusted to you.



**John Abrenilla**

*Vice President of Global  
Trust and Security*

This means using them efficiently and protecting them from unauthorized use. You are allowed to make limited personal, non-business use of Seagate resources, such as making reasonable personal calls or emails. Whenever you use Seagate resources, be sure to use good judgment and act in a professional manner.

# Special Considerations in Seagate Asset Protection

## Confidential Information

Protecting Seagate’s confidential information is every employee’s responsibility. Confidential information is non-public information that may be useful to competitors or harmful to Seagate, our business partners, or customers if it is disclosed. Information is confidential when classified as “Internal”, “Confidential” or “Restricted” under the [11-9200 Data Classification Policy](#). You must only use Seagate confidential information for Seagate business purposes. You must only disclose confidential information to people with authorization and a need to know the information. Tell your manager if someone asks for confidential information and you are unsure if they are authorized to have it.

For more information:

[Engineering and Business Data Handling Procedures](#)  
[11-9200 Data Classification Policy](#)  
[11-1160 Records Retention Policy](#)

## Intellectual Property

You must protect and preserve Seagate’s intellectual property rights. Intellectual property includes patents, copyrights, trademarks, trade secrets, inventions, and processes. We expect people and companies to honor our intellectual property rights. We also respect the intellectual property of others. This means we comply with licensing and other similar agreements.

For more information:

[11-1910 Protecting Seagate Confidential Information Using Non-Disclosure Agreements](#)  
or contact the Legal Department

## Physical Assets

Physical property such as facilities, supplies, equipment, inventory, vehicles, cash, and company accounts are physical assets. You are responsible for protecting and using Seagate's physical assets responsibly. This means securing assets to avoid loss, damage, theft, unauthorized use, and waste. Do not take products or supplies for personal use. Do not use Seagate credit cards for personal expenses. It is a violation of this Code and the law to divert assets through fraud or embezzlement.

**For more information:**  
**10-2170 Acceptable Use of Internet  
and Electronic Services**  
**08-7010 Assigned Equipment**

## Records Retention

It is important to manage business records according to [11-1160 Records Retention Policy](#). A business record is information that you create, receive, and maintain as part of your work for Seagate. Business records include business reports, contracts, meeting minutes, and regulatory and compliance documents. The Records Retention Policy gives instructions for what information you must keep and for how long. It is important to destroy or delete expired information according to the records retention schedule.

However, business records related to investigations or legal proceedings must be kept even if expired. These records are on "legal hold." If you control any business records on "legal hold," you must not alter, conceal, or destroy the records. The Legal Department will notify you when the records are no longer on "legal hold."

**For more information:**  
**11-1160 Records Retention Policy**

## External Communication and Social Media

All communications with investors, shareholders, the press, and the financial community must be authorized by Seagate's Public Relations or Investor Relations departments. The communications must be accurate and complete. We prohibit unauthorized leaks or disclosures.

You should use social media in a way that is consistent with our Code. You should not use social media to reveal confidential Seagate information, or to harass or discriminate against others. Any Seagate social media account, contract, content, or login credentials are the sole property of Seagate.

For more information:  
[03-100300 External Communications Policy](#)  
[11-1091 Publication Policy](#)

## Sustainability

Seagate is committed to developing and maintaining sustainable, responsible practices in its global operations. We comply with environmental regulations and operate in a sustainable way. You should be aware of environmental issues. You should also do your part to help prevent pollution, reduce waste, and conserve natural resources.

For more information:  
[Sustainability Site](#)





# Ensure Financial Integrity

# Ensure Financial Integrity

Seagate maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every country where we operate. Our shareholders rely on each of us to maintain accurate and complete books and records. These are the foundation of our public disclosures, and must provide an accurate view of our operations and financial standing. Each of us has a role in making sure that money is spent appropriately. We must also ensure our financial records are complete,

accurate, and comply with our internal controls. This is especially important when we hire a new vendor, submit an expense report, sign a new business contract, or enter into any deals on Seagate's behalf.

Each of us is personally responsible for the integrity of the information, reports, and records under our control. You must ensure that all information in our records is complete, accurate, and understandable. You must never give incorrect facts, falsify any record or account, or interfere in any way with audits of our financial records.



**For more information:**  
**Financial Management Policies**  
**Internal Control Policies**  
**11-9100 Contracts Policy**



# Conclusion

# Conclusion

We rely on one another's good judgment to uphold a high standard of Integrity. We are committed to being transparent, compliant, and ethical. We expect all Seagate team members and partners to follow not only the letter of this Code, but also the spirit of this Code. Sometimes, identifying the right course of action is difficult. Don't be afraid to ask questions or speak up if you see something that you think isn't right.



# List of Policies

- 06-1045 Equal Employment Opportunity
- 03-100300 External Communications Policy
- 06-8002 Alcohol and Drug Free Workplace
- 06-8008 Harassment Free Workplace
- 06-8011 Relationships at Work Policy
- 06-8085 Violence Free Workplace
- 08-3005 International Trade Compliance Policy
- 10-2170 Acceptable Use of Electronic and Internet Services
- 10-2200 Global Investigations
- 11-1090 Invention Assignment and Inventor Recognition
- 11-1091 Publication Policy
- 11-1095 Trade Secrets from Outside Sources
- 11-1160 Records Retention Policy
- 11-1161 Legal Hold Policy
- 11-1200 Anti-Bribery and Anti-Corruption Policy
- 11-1600 Code of Ethics for Senior Financial Officers
- 11-1700 Securities Trading Policy
- 11-1800 Antitrust Policy
- 11-1900 Right to Intellectual Property Resulting from Work Performed at Seagate
- 11-1910 Protecting Seagate Confidential Info with NDAs
- 11-9001 Privacy Program Policy
- 11-9002 Privacy Review Policy
- 11-9003 Privacy Review Standard
- 11-9004 Records of Processing Policy
- 11-9005 Data Protection Officer Policy
- 11-9006 Privacy Training and Awareness Policy
- 11-9007 Data Subject Request Policy
- 11-9008 Consent Management Policy
- 11-9009 Consent Standard
- 11-9010 Privacy Notice Standard
- 11-9011 Automated Processing/Profiling Policy
- 11-9012 Privacy by Design/Default Policy
- 11-9013 Data Controller Request Policy
- 11-9100 Contracts Policy
- 11-9200 Data Classification Policy

# Additional Resources

[Compliance Officers](#)

[Ethics and Compliance Site](#)

[Seagate Technology Code of Ethics for Senior Financial Officers](#)

[Financial Management Policies](#)

[Global Privacy Policies](#)

[Internal Control Policies](#)

[Potential Conflict of Interest Disclosure Form](#)

[Privacy Statement](#)

[Seagate Ethics Helpline](#) (English, Mandarin, Malay, Thai, and Korean)

[Sustainability Site](#)