

# Marketing Ethics Policy

For over 40 years, Seagate Technology has been a values-driven organization. The way we conduct business stems from the ethos of global citizenship and our corporate values—Integrity, Inclusivity, and Innovation. This statement outlines Seagate’s marketing ethics.

## Seagate Values



Seagate is committed to meeting the highest ethical and legal standards while addressing our customer requirements.

Underlying our marketing ethics is a dedication to foster our customers’ fully informed choice. We are equally committed to providing our shareholders with transparent and timely information. The two ethical obligations—to customers and to shareholders—are not mutually exclusive. Our state-of-the-art solutions enable humanity to flourish by harnessing

the datasphere. These in-demand offerings, when marketed ethically, enable us to satisfy both customers and shareholders.

At Seagate, integrity plays a role not just when it comes to human and material resources, product development, quality assurance, and sales, but also in the way the story of the brand is told.

In order to tell this story with integrity, Seagate’s employees rely on the following guidelines.

## General Principles

In its marketing practices, Seagate chooses to:

### 1 **Clearly and accurately represent its products, services, and terms and conditions.**

- We adhere to the U.S. Federal Trade Commission regulations concerning **truth in advertising** and to the **International Consumer Protection and Enforcement Network's declaration** that "consumers in the digital economy are entitled to know what they are getting and on what basis."
- We are committed to avoiding deception in any form: omission, misrepresentation, or misleading practice.
- We refrain from puffery. Our goal is to deliver products and services as depicted by marketing communications and avoid any deception regarding products, pricing, communications, and product delivery.
- We do not plagiarize the work of others.
- We are upfront with consumers regarding paid endorsements by media, review sites, and influencers.

### 2 **Enact policies, procedures, and practices that protect customer privacy.**

Our business has been built around enabling our customers to derive maximum value from data. Our policies around data privacy, data governance, data transparency, and data's proper classification and treatment ensure compliance with laws and regulations as well as agreements we enter into. All customer data-related policies can be **easily accessed**.

- We are committed to never exploiting our customers' data.
- We do not misuse that data, using it only in accordance with our data privacy policy and any customer-provided directions.

### 3 **Comply with laws and regulations** in each country and state where we conduct business. In addition, Seagate fulfills the self-regulatory obligations or programs into which we **voluntarily entered**.

### 4 **Deliberately apply standards of fairness and transparency with regard to our competitors.**

We refrain from tactics intended to attack or undermine our competitors. While one purpose of marketing is to create competitive advantage, Seagate sets limits to how it can be forged.

We choose not to:

- Plant negative reviews of our competition in social media or any other forums.
- Incentivize reviewers to shed negative light on our competition.
- Generate other negative publicity about our competitors' products or business strategy, whether covertly or overtly.

### 5 **Promote inclusivity of representation among those who speak on behalf of our brands.**

We welcome diversity of identity and diversity of thought.

Among other traits, Seagate does not discriminate based on:

- gender
- ethnicity
- age
- sexual orientation
- LGBTQ identities
- ancestry
- physical abilities
- religious affiliation or its absence
- political beliefs

**WE CHOOSE TO PROMOTE EQUALITY AND INCLUSION EVEN IN COUNTRIES AND REGIONS WHOSE LAWS DO NOT OPPOSE DISCRIMINATION.**

In our marketing practices, we do not exploit the misfortunes of others, and refrain from offensive behavior, sexist and gender stereotypes, and portraying minorities and women in demeaning, objectifying ways.

Seagate is a signatory of The Equality Act passed in 2019 by the United States House of Representatives, which prohibits “discrimination on the basis of the sex, sexual orientation, gender identity, or pregnancy, childbirth, or a related medical condition of an individual, as well as because of sex-based stereotypes.”

As a result of these commitments, for example, Seagate does not use models at Seagate events, choosing knowledgeable subject matter experts for our event support instead.



**Dave Mosely**  
Chief Executive Officer (CEO)

Our inclusive practices have been recognized. A couple of examples:

- The Human Rights Campaign’s Corporate Equality Index named Seagate Technology among the Best Places to Work for LGBTQ Equality.
- Seagate received an award for hiring people with disabilities and fostering an inclusive working environment from the Wuxi New District Human Resource Association in China.

We choose to promote equality and inclusion even in countries and regions whose laws do not oppose discrimination.

**6 Communicate in a respectful and courteous manner and respond to inquiries and complaints in a constructive, timely way.**

Effective marketing means listening to and engaging with prospective and existing customers. We are mindful of this in particular on social media channels and in customer service.

Our goal is to act in a manner that is responsive, transparent, and accountable to customers and consumers who reach out. We care about our customers and their data, and we are here to help.



**Jeff Fochtman**  
Senior Vice President of  
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