

Seagate Ethics Helpline Q&A

What is the Ethics Helpline?

Seagate has contracted EthicsPoint to administer the Seagate Ethics Helpline, to enable concerned individuals (whether employees, contractors, vendors, and Seagate partners) to report fraud, abuse, and other misconduct in the workplace, while cultivating a positive work environment. Because the Ethics Helpline is administered by a third-party vendor, NAVEX, we can provide our people a secure and confidential reporting tool with 24-hour access, and if requested and permitted (by local laws), anonymous report submission.

You can access the Seagate Ethics Helpline online or by phone (phone numbers are available at <https://seagate.alertline.com/> or you can call **1-800-968-4925**).

You can also access Seagate's Ethics Helpline using your mobile device, by scanning the QR code on the Ethics Helpline webpage.

The Ethics Helpline's website is hosted on EthicsPoint's servers, whereas the phone numbers are operated by EthicsPoint. A reporter's identity cannot be revealed through telephone or internet records.

If you are a Seagate customer with a product inquiry or issue, please contact our customer support at <https://seagate.com/contacts/> or by phone at **1-800-732-4283**.

Why do we need the Ethics Helpline?

- Our workers are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- Seagate's Corporate Values reflect our long-standing commitment to the highest standards of ethical behavior. We have a duty to take appropriate measures to identify situations of activities going wrong and attempt to remedy them. By encouraging a culture of openness and accountability, we believe that we can help prevent such situations from occurring.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.
- The Ethics Helpline helps address questions or concerns about compliance with policies and laws. It is also a way to report concerns about unethical behavior or a possible violation of law, the [Seagate Code of Conduct](#) or the [Seagate Code of Ethics](#).

Reporting – General

May I report using either the Internet or the telephone?

Yes. The Ethics Helpline enables you to file a report via web-based tool or by phone.

What types of situations should I report?

You may report violations of policy or law, misconduct, harassment, discrimination, and unethical behavior.

Please note that the Ethics Helpline is not an Emergency Service. If you believe there is an immediate threat to life or property, please contact 911 or the relevant emergency number in your location.

What type of information should my report contain?

It is important to include as much information and context as possible when submitting a concern to the Ethics Helpline. We will typically need to know who is involved, what happened, where and when the concerning behavior took place. Without such information, it may be difficult to investigate the matter. Details are very helpful in providing additional context for our review.

If I see a violation, shouldn't I just report it to my manager, Security, or Human Resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. You should feel empowered to raise concerns to your manager, supervisor, Security, or local Human Resources representative. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX to offer the Ethics Helpline, which is intended to serve as an additional channel and resource to report concerns. If you do not wish to identify yourself, we would rather you report anonymously (where anonymity is permitted by local laws) than keep the information to yourself. However, solvability of cases increases when reporting parties are open to dialogue with our investigators. Communication with our investigators helps provide context for the issue you are reporting. If you choose to report anonymously, please ensure you communicate detailed and specific information, including names and dates, so that we can adequately address the issue. Please also know that Seagate has a no retaliation policy and will not tolerate any retaliation against employees who come forward with good faith concerns.

Why should I report what I know? What's in it for me?

Seagate is committed to conducting business with integrity, fairness, and trust, with respect for the law and our values. You can do your part by raising awareness of any concerns you may have. We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive work environment.

Does management really want me to report?

Your reporting can minimize potential negative impacts on Seagate and its personnel. Also, offering input may help identify issues that can improve corporate culture and performance. Everyone plays a role in building a culture of integrity, fairness, and trust at Seagate.

Where do these reports go? Who can access them?

Reports are entered directly onto the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within Seagate who are responsible for evaluating each report, based on the type of violation and location of the incident. Seagate has established a system of checks and balances to prevent involved parties from investigating their own cases. All report recipients have had training in maintaining report confidentiality.

Isn't this system just an example of someone watching over me?

No. The Ethics Helpline is a positive aspect of our overall philosophy that allows us to ensure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical issues and communicate concerns. Effective communication is critical in today's workplace, and we believe that this is an excellent tool to enhance that communication. We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

NAVEX **does not generate or maintain** any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a personal PC, outside the Seagate work environment, to access the EthicsPoint secure website.

Can I file a report from home and not be identified?

A report from home, a neighbor's computer, or any internet portal will remain secure and will not identify you. An internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses, so it is not possible to identify an individual in this manner.

I am concerned that the information I provide through the Ethics Helpline will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system itself protects your anonymity (where anonymity is permitted by local laws). Be aware that if you do wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not inadvertently reveal your identity. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the toll-free Ethics Helpline telephone number confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an internet-based report and an interviewer will type your responses into the EthicsPoint web site. These reports have the same security, confidentiality, and anonymity (where anonymity is permitted by local laws) measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report to identify yourself and we highly encourage you to do so. We often have follow-up questions regarding the information that has been reported and need your help with clarification. Having as much factual information as possible greatly enhances our ability to conduct a timely and effective investigation.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

What if my boss or other managers are involved in a violation? Won't they get the report?

No! The EthicsPoint system and report distribution ensures that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report on the EthicsPoint website or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. If you filed your report anonymously, you and the company have entered into an "anonymous dialogue," where you can continue to provide information anonymously.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report. Access to case details and messages are privileged to specific users.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still file a report if I don't have access to the Internet?

If you do not have access to the internet or are uncomfortable using a computer, you can call the EthicsPoint toll-free Ethics Helpline, which is available 24 hours a day, 365 days a year.