

Symantec Anti-Human Trafficking Policy and Compliance Plan Notice

I. Purpose

This sets forth Symantec's and the United States Government's Policy against trafficking in persons ("human trafficking") as well as elements of Symantec's Compliance Plan in that regard. The Policy and Plan are consistent with Symantec's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our global business practices. It also complies with the requirements of Federal Acquisition Regulation Subpart 22.17 and 52.222-50.

II. Policy

The United States Government and Symantec have a long-standing, zero-tolerance policy prohibiting human trafficking-related activities. Pursuant to U.S. and Symantec policy (the "Policy"), forced, bonded (including debt bondage) or indentured labor, commercial sex, involuntary prison labor, slavery, or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. Furthermore, as required by law, and pursuant to Symantec Policy, Symantec, its employees, its subcontractors, and its agents shall not:

- 1. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- 2. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- 3. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- 4. Charge employees recruitment fees;
- 5. Where employees are recruited from another country, fail to provide return transportation or pay for the cost of return transportation upon the end of employment;

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- 6. Provide or arrange housing that fails to meet the host country housing and safety standards;
- 7. If required by law, fail to provide an employment contract, recruitment agreement, or other required work document in writing.

III. Responsibility

Each employee, subcontractor, and agent of Symantec is responsible for ensuring compliance with this Policy.

IV. Disciplinary Action

Any violation of this Policy could result in disciplinary action, up to, and including, removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment.

V. Reporting

- Credible information regarding a potential violation of this Policy, whether by a Symantec employee, agent, subcontractor, or subcontractor employee must be immediately reported to the Human Resources Department and Office of Ethics and Compliance via Symantec's <u>EthicsLine</u> or to the Legal Department, publicsectorlegal@symantec.com.
- 2. Any reporting will be done without fear of retaliation.
- 3. Employees aware of potential human trafficking violations may, in addition, contact the U.S. State Department's Global Human Trafficking Hotline directly at 1-844-888-FREE or help@befree.org.

VI. Compliance Plan

Symantec's Compliance Plan includes the following:

- 1. Procedures to ensure compliance with each element of the Policy;
- 2. An awareness program;
- 3. A recruitment and wage plan that ensures that wages meet host country legal requirements;

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4. Procedures to prevent agents and subcontractors at any tier or dollar value from violations and to monitor, detect, and terminate any agents, subcontractors, or subcontractor employees that have violated the Policy.

For further information regarding the Policy or Plan please contact the Legal Department at <u>publicsectorlegal@symantec.com</u>.

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