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Team,

What we do at NortonLifeLock matters: we help secure the devices, identities, online privacy, and home and family needs of millions of consumers, providing them with a trusted ally in a hyper-connected mobile world. It’s an important mission and one that we deliver on better than anyone else. Our position as a global leader in consumer Cyber Safety depends on more than our technology—it relies on our reputation as an ethical company, one that consumers can trust with their information because we operate with integrity and accountability in everything we do.

The cornerstone for our commitment to integrity and accountability is our Code of Conduct. Centered on our values and standards, the Code serves as a guide for our expectations for ethical conduct, and is aligned with our business practices and policies. The Code of Conduct ensures that we uphold a safe environment to raise concerns.

A high standard of ethics and good governance is one of our greatest strengths, and we all play an important role in protecting it. Our Code of Conduct empowers us as we lead, innovate, grow, and win as an ethical and conscientious company. Thank you for giving it your full attention.

Vincent Pilette
CEO NortonLifeLock
HONOR OUR MISSION

THE NORTONLIFELOCK WAY

At NortonLifeLock, what we do matters: we provide Cyber Safety for today’s evolving digital universe. Delivering on our mission is more than a job, it’s a calling—one that requires us to act with honesty, loyalty, empathy, and accountability in everything we do. Our customers trust us with their most valuable asset—information—and so our actions must deepen their TRUST in us as a team and as a company.

Our Code defines what we expect from all employees. It also applies to all non-employee directors and third parties representing or providing services to NortonLifeLock, such as contractors. It tells you what we mean when we talk about GOOD JUDGMENT and ETHICAL BEHAVIOR and how to live our values in your day-to-day role. It covers many different situations you may encounter during the course of business and outlines principles to help you deal with those situations by DOING THE RIGHT THING.

As a team member, our ask of you is simple:

→ Read the Code of Conduct, and use it as your guide
→ Ask for help when in doubt
→ Apply your best judgment
→ Avoid decisions that will make our customers doubt us or that create a negative work environment for your team members

We trust our team members to make smart choices and we draw lines around those behaviors where there is no flexibility or room to improvise.

Every team member must:

• Comply with the laws, rules, and regulations in each country where we conduct business.
• Learn the details of all policies that affect your job.

You don’t have to memorize every policy word-for-word, but you do need a basic understanding of the issues covered by each policy, and how your work may be impacted by related requirements.
HONOR OUR MISSION

• **Ask for help.** If you have questions about a policy and what it means for you, get help from your manager, Ethics & Compliance, Legal, People & Culture, or other relevant company resources.

• **Speak up until you are heard.** Every team member has the power and the responsibility to escalate an issue whenever it’s needed.

• **Know your rights.** There are many ways to flag a problem: written, verbal, and completely **anonymously**.

(Note that a third party operates EthicsLine. When a report is made anonymously, even NortonLifeLock Ethics & Compliance cannot view your identity.)

WE ARE ALL ACCOUNTABLE

When we are aware of a problem or concern, even as a bystander, we are obligated to **RAISE AWARENESS** and to **COOPERATE** to help resolve any remaining issues. Bad decisions, ethical or legal, including violations of this Code and the related Policies, have serious consequences and may result in disciplinary action, up to and including termination, as well as civil or criminal legal action.

NortonLifeLock’s Global Head of Compliance is responsible for approving any amendments to or waivers of this Code as well as addressing violations. Any waiver of this Code for Executive Officers or directors must be made by the Board of Directors and disclosed to shareholders along with the reasons for the waiver.
LIVING OUR VALUES

Each employee is a valued member of a team that is working to achieve our inspiring mission: to provide Cyber Safety for today’s evolving digital universe. In order to achieve this mission, we embrace a set of values, which celebrates diversity, promotes teamwork, and encourages every employee to contribute and to thrive. At NortonLifeLock, each employee is inspired to:

- **Think Customer**: Our customers are at the center of everything we do, and we work as one team to protect our customers like no one else can.
- **Dream It**: We foster creativity and embrace diverse points of view. That means we love to color outside the lines, and we know how to learn from our mistakes.
- **Own It**: NortonLifeLock employees set the bar high, and we deliver what we promise.
- **Get After It**: Every NortonLifeLock employee is part of a team. That means we work together, win together, and accept nothing but the best.
- **Stand Together**: We leverage our collective strengths, and we work together to help our employees and communities prosper.

The Code of Conduct encourages us to live these values and to conduct business in line with the highest standards of integrity. Accordingly, all employees (regardless of position or level in the organization) are expected to act professionally, ethically, and legally at all times, and in all interactions with our customers, vendors, business partners, competitors, and communities. This includes compliance with all our policies in all circumstances at which NortonLifeLock employees, partners, or customers are present, both on and off the job, and inside and outside the office (including during business travel and at external events). NortonLifeLock's brand and reputation are the foundation of our company, and they are in your hands. Employees can do their part to safeguard our brand when they act ethically and consistently with our values, our
LIVING OUR VALUES

Code of Conduct, our policies, and the law. If employees encounter any wrongdoing or areas of concern, they are expected and encouraged to ask questions, speak up, and report issues to People & Culture, Ethics & Compliance, or a member of management.

As a leader in consumer Cyber Safety, we safeguard trust and confidence in our brand by protecting the organization's people, customers, and assets from harm. Employees must embrace and abide by our NortonLifeLock SECURITY NON-NEGOTIABLES at all times:

- **Culture of Security.** I role model good security behaviors and call out poor security practices.
- **Secure by Design.** I advocate and contribute to our world-leading security technology.
- **Trusted Access.** I only use a secure, trusted device to access company systems and data.
- **Protected Data.** I ensure that sensitive data – especially customer data – is always protected.
- **Responsible Partners.** I only use technology services from companies that share our high standards for security.
- **Resilient Systems.** I ensure that all company systems meet a minimum set of security requirements.
WINNING CULTURE

We set the bar high, using our collective strength to work together and win together. We are each responsible for our decisions, actions, and how we get results as a team.

At NortonLifeLock, we take our mission seriously, and we expect everyone to act in a professional manner. Be respectful to your teammates, potential teammates, customers, partners, vendors, and visitors to the company. We all have a duty to embody our values and safeguard our brand and reputation by complying with company policies and procedures at all times.

A CULTURE OF RESPONSIBILITY

Corporate responsibility and positive social impact are core to our business strategy. INTEGRITY is a cornerstone of our mission and values, and helps define our WINNING CULTURE. Through our global efforts to build and sustain a diverse and inclusive workplace, support vulnerable populations with our expertise and technology, and reduce greenhouse gas emissions, we remain committed to making the world a better and safer place.

Global Workforce Inclusion

To LEAD, we push the envelope, energize each other, recognize, and reward for real and meaningful results.

To INNOVATE, we build teams that are diverse in experiences, ideas, and perspectives and enable them to do their best work.

To GROW, we work together—challenging ourselves and each other to be curious, celebrate unique viewpoints, and respect differences.

What we do matters to the safety of the digital world, so we must WIN for each other and our customers. Part of winning as a company requires that we are good corporate citizens, doing good in the world and giving back in the communities where we work. We demonstrate our commitment by investing in education, promoting volunteerism, and through charitable donations.
WINNING CULTURE

FAIR EMPLOYMENT PRACTICES

NortonLifeLock is an equal opportunity employer, making employment decisions on merit, experience, and potential. We CELEBRATE DIVERSITY, the driver of innovation. We seek out perspectives and skills that challenge our current state of being and thinking. You should never feel that race, color, gender identity, sexual orientation, national origin, ancestry, religion, physical or mental disability, age, veteran status, or other characteristics protected by applicable law influence your ability to work and potential to grow at NortonLifeLock—we are committed to ensuring a safe and productive workplace.

We prohibit any and all conduct that may reasonably be considered discrimination, harassment, or bullying. This includes sexual harassment of any kind, which is defined in the Global Workforce Inclusion Policy. This policy applies at all company locations, company-sponsored social or other events, as well as activities at which employees or contractors represent NortonLifeLock. All employees and contractors are responsible for abiding by and helping to enforce this policy by reporting any suspected violating behavior to their manager, People & Culture, or Ethics & Compliance. Managers are expected to be extra sensitive to any words and/or actions that might be perceived as bullying, harassment, or discrimination, and they must take action, including notifying Ethics & Compliance, to stop bullying, harassment, or discrimination whenever seen or reported. Managers may be held accountable for failing to report these behaviors.

Refer to our Global Workforce Inclusion Policy for more detail.
WINNING CULTURE

Diversity and Inclusion

We promote and support a diverse workforce at every level of the company. We ask you to bring your whole self to work, to be exactly who you are while also RESPECTING others. We want to be the kind of company that can attract, retain, and fully engage diverse talents because it is diversity that envisions the future and makes INNOVATION a reality.

Health, Safety, and Security

You deserve to feel safe and secure while working for NortonLifeLock. In addition to applicable laws, our policies to promote an injury-free, safe, and secure workplace must be followed by everyone. Threats, threatening behavior, stalking, or acts of or implied violence by anyone on company property is not tolerated. Lethal weapons, dangerous or illegal items, and pornography or offensive material are not permitted at any company facility or company-sponsored event. In addition, individuals may not use company resources for purposes of buying, selling, collecting, using, or promoting any of these prohibited items. Refer to our Inappropriate Possessions in the Workplace and Corporate Security and Safety Policies for more information.

Drugs and Alcohol

The use, possession, sale, or purchase of illegal drugs or controlled substances while on the job or in any company facility is not tolerated. Employees should never come to work under the influence of alcohol, drugs (including lawfully-prescribed drugs unless pursuant to an approved accommodation and in accordance with a doctor’s recommendation), or any other substance that could impair their ability to do their job or jeopardize the safety of others. Refer to the Substance-Free Environment Policy for more information.
WINNING CULTURE

HUMAN RIGHTS

We support and respect internationally recognized human rights and labor standards as proclaimed in the Universal Declaration of Human Rights, the International Labor Organization’s Core Conventions, the International Covenants on Civil and Political Rights and on Economic, Social, and Cultural Rights, and the United Nations Guiding Principles on Business and Human Rights. We are a signatory to the United Nations Global Compact (UNGC). NortonLifeLock respects the dignity of others and expects our employees and vendors to comply with the policies outlined in this Code, as well as our Human Rights Policy. We commit to proactively avoid human rights abuses and complicity in the abuses of others through due diligence procedures. We expect our vendors and suppliers to adhere to the standards in our Global Supplier Code of Conduct and the Electronic Industry Citizenship Coalition (EICC) Code of Conduct.

COMMUNITY INVESTMENT

NortonLifeLock has a responsibility to operate as a good corporate citizen and to make a POSITIVE contribution to the customers, communities, shareholders, and stakeholders that we serve. Our model for community investment is strategic and aligned to our business priorities, enabling us to maximize our impact through STRATEGIC PARTNERSHIPS with leading non-profits, monetary and product donations, and mobilizing employees’ time and talents.

RESPECT FOR THE ENVIRONMENT

We have a global RESPONSIBILITY to operate in an environmentally sound manner, uphold ETHICAL and social standards in our supply chain, and make a positive difference in the communities where we live and work. We’ve developed programs designed to increase the energy efficiency of our operations, reduce waste, and protect the environment. Our Environmental Policy Statement documents our commitment to responsible environmental practices throughout our business.
INSPIRE TRUST

PRIVACY AND PERSONAL INFORMATION PROTECTION

NortonLifeLock is a leader in consumer Cyber Safety and is committed to adequately PROTECTING the personally identifiable information of our employees, customers, and business partners (together “Trusted Data”). We are committed to protecting Trusted Data.

We have a collective and individual duty to protect Trusted Data. In order to comply with applicable laws, you must comply with our Privacy Policy and help NortonLifeLock to uphold its commitments to the protection of Trusted Data. For more information, contact the Privacy Team.

PROTECTING, DISCLOSING, AND RECEIVING CONFIDENTIAL INFORMATION

We have a duty to protect confidential and proprietary information. NortonLifeLock confidential information is just that: CONFIDENTIAL. “Confidential” means anything that’s non-public information, from pricing data, business strategies, and sales records, to source code and technical information. Our assets are both tangible (physical) and non-tangible, such as intellectual property. Information classified as “NortonLifeLock Confidential” or “NortonLifeLock Restricted” is considered confidential. For more details about classifying and protecting information, refer to the NortonLifeLock Data Classification Standard.

Our Privacy Principles

Lawfulness, Fairness, and Transparency. We collect and use personal information lawfully and transparently, and we aim to clearly share information about our privacy practices.

Purpose Limitation. We collect and use personal information for specified and legitimate purposes.

Data Minimization. We collect and use personal information that is relevant for our use and necessary for specific and legitimate purposes.

Accuracy. We collect and retain personal information that is reliable, accurate, complete, and current.

Retention. We only retain personal information as long as long as is necessary for specified and legitimate purposes.

Integrity and Confidentiality. We ensure personal information is always protected and processed carefully and securely.

Accountability. We are all responsible for upholding these privacy standards and respecting individuals’ privacy rights.
INSPIRE TRUST

We must ensure that confidential information is not disclosed externally without a Non-Disclosure Agreement in place. This includes not providing confidential information to third parties without appropriate protections, as well as not using non-secure systems—such as personal email—to transmit NortonLifeLock information. Company information must always be protected in accordance with the Information Security Policy and the Data Classification Standard.

Third-party confidential information should also be handled carefully. Be wary of any outside person or company providing confidential information without any other protections. Casual acceptance of confidential information creates a risk that we will be accused of misusing it.

PROTECT AND SAFEGUARD COMPANY AND THIRD-PARTY ASSETS

Assets include tangible and intangible property as well as business and technical information; many of these assets are critical to our business success. We have a duty to use these assets for legitimate business purposes only and to protect them from loss or unauthorized use. In no event may company assets be used for unlawful or improper purposes.

Each of us is responsible for protecting company assets. BE ALERT to situations or incidents that could lead to the loss, misuse, or theft of company property.

USE OF PERSONAL OR COMPANY EQUIPMENT TO RECORD ANOTHER PERSON WITHOUT THEIR CONSENT

Recording others without consent is not just deceptive, it’s a violation of law in many places NortonLifeLock operates. Individuals should not make any audio or video recording of another person at work without their notice and consent. This includes recording conversations with an audio or video recording device or using an electronic device such as a smartphone, tablet, or wearable technology. Refer to our Inappropriate Possessions in the Workplace Policy for more information.
We are committed to fully comply with applicable import and export laws and regulations to ensure that our products, software, services, and technology (including source code) are not transferred to any of the following:

- any individual or entity on a restricted list published by the United States, European Union, or other governmental authorities of relevant jurisdictions;
- any individual or entity suspected of involvement in the proliferation of missile technology and/or nuclear, chemical, or biological weapons; or
- any individual, entity, or country that is subject to sanctions or embargo (including Cuba, Iran, North Korea, Sudan, Syria, and the Crimea Region of Ukraine).

We should not agree to any contractual clauses that obligate a party to boycott any country, which are illegal in the United States. For more information, contact Trade Compliance or refer to the Global Trade Compliance Policy.
UNLEASH INNOVATION

NortonLifeLock is a leader in consumer Cyber Safety because we take bold, smart risks while embracing diverse points of view: we innovate. When dreams become reality, when ideas come to life, we create intellectual property.

INTELLECTUAL PROPERTY

NortonLifeLock’s intellectual property is vital to its business SUCCESS. Intellectual property includes patents, trademarks, copyrights, trade secrets, source and object code, marketing plans, customer and employee contact lists, or other confidential or propriety information. NortonLifeLock invests substantial amounts of money in you as an employee, in the development of products, services, and business processes, and in the protection of related intellectual property. The intellectual property that you create while doing your job contributes to NortonLifeLock’s STRENGTH and you have a duty to protect these valuable assets from misuse and unauthorized disclosure.

• Just as we expect others to honor our intellectual property rights, we honor the intellectual property and privacy rights of others. You have a duty to protect any confidential information you receive from others from misuse and unauthorized disclosure.

• The intellectual property you create at NortonLifeLock belongs to NortonLifeLock, even if you leave the company.

• We do not accept unsolicited suggestions that the submitter may consider confidential, such as unsolicited ideas for future products. This policy is intended to prevent NortonLifeLock’s own R&D and other business activities from becoming encumbered by unintended obligations to outsiders. Any recipient of an unsolicited suggestion should promptly contact NortonLifeLock Product Legal Support. Also, please refer to the NortonLifeLock Policy Repository for policies related to patents and intellectual property.
ACT WITH INTEGRITY

CONFLICTS OF INTEREST

We know that you have a life outside of NortonLifeLock and we respect your right to take part in legitimate financial, business, charitable, and other activities outside of your job. As employees of NortonLifeLock, we also lead with honesty, transparency, and integrity. Employees are expected to act in the company’s best interests and to exercise sound judgment unclouded by personal interests or divided loyalties. We want to avoid the appearance of, as well as an actual, conflict of interest in the performance of our duties for NortonLifeLock and our personal activities. Not all situations are black and white even when using your best judgment—when in doubt, just ask!

Potential conflicts of interest that require pre-disclosure to Ethics & Compliance include:

• Outside Employment. Your duty to NortonLifeLock is to ensure that outside employment and other activities do not improperly influence your judgment, decisions, or actions with respect to your role at the company, interfere with your work at NortonLifeLock, cause you to misuse company information or assets, or result in consequences unfair to NortonLifeLock. This holds true regardless of whether you may be called an “employee,” “consultant,” “contractor,” “owner,” “investor,” or “volunteer.”

Disclosing Conflicts

The effectiveness of this policy relies on every team member disclosing situations that may be considered a conflict of interest. You must disclose all potential conflicts to Ethics & Compliance via EthicsLine. Through EthicsLine, you will be asked to submit the details of your proposed engagement and approval from your manager. You have a continuing obligation to disclose any change in circumstances that could affect NortonLifeLock’s interests, and resolve any actual conflicts. This record allows all employees to proceed with outside activities with the confidence that full transparency and pre-approval have been provided, should any questions arise in the future.
ACT WITH INTEGRITY

• **Personal Benefit or Gain from Business.** Receiving personal benefits from others because of your status as an employee may lead to divided loyalties. You are not allowed to accept any personal profit or advantage other than your compensation from NortonLifeLock in connection with any transaction involving NortonLifeLock, or your status as an employee. This includes situations where you or your NortonLifeLock team may be conducting NortonLifeLock business directly or indirectly with members of your family, your friends, or others with whom you have a close personal relationship or their affiliates, and requires prompt disclosure to Ethics & Compliance. In addition, pre-approval by Corporate Legal is required for any transaction between the company and a third party (e.g., customer, vendor, service provider, etc.) in which a director or officer of NortonLifeLock is affiliated (e.g., a director, officer, or controlling shareholder) or may have a material interest. A list of these third parties is available here.

• **Outside Directorships.** Participating on the board of directors of other companies or non-profit groups may enhance your business and leadership skills, but may also lead to conflicts of interest and requires disclosure and pre-approval by Ethics & Compliance prior to engagement, whether or not compensation is involved. Serving on the board of a competitor is never allowed.

• **Finances Interests in Other Businesses.** You are not allowed to have a personal or family financial interest in a NortonLifeLock customer, channel partner, supplier, other business partner, or competitor. These financial interests include investment, ownership, or creditor interests, which could improperly influence your judgment, have the potential to cause the appearance of divided loyalty, or might result in personal benefit because of your role at NortonLifeLock.

• **Relationships with Colleagues.** Romantic relationships between colleagues may create an actual or apparent conflict of interest which may require changes to be made to work arrangements depending on the employees’ roles within the company. These relationships are required to be promptly disclosed to Ethics & Compliance.

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**Red Flags**

• Hiring a spouse, relative, or close personal friend over another candidate

• Encouraging your family to invest in a NortonLifeLock partner or vendor

• Performing duties related to an outside role or Board position during your regular work hours or with company resources
ACT WITH INTEGRITY

- **Employment of Relatives.** It is company policy NOT to employ relatives: (1) in the same department, unless they are reporting to different first-line managers; (2) where one is managing the other or in a position to influence the career of the other; or (3) where one employee is in a position considered "sensitive" or "confidential." See the Employment of Relatives Policy for more information.

INSIDER TRADING

Everyone at NortonLifeLock is prohibited from providing inside information—about our company or its suppliers, customers, or other third parties—to others. Insider trading, insider dealing, and stock tipping are criminal offenses in most countries where we do business. Any employee or director who has material, non-public information about NortonLifeLock may not buy or sell company securities or engage in any other action to take advantage of that information, or to pass it on to others. Those who are likely to have access to inside information are restricted from engaging in any transactions with company securities during quarterly blackout periods, except for trades pursuant to Rule 10b5-1 plans. In addition, certain employees must obtain prior written approval for all securities transactions, regardless of when they occur. If you are considering a stock transaction and you believe you may have inside information, consult with NortonLifeLock’s Corporate Legal Team. Refer to our Insider Trading Policy for details on what constitutes material non-public information.

- **Use Good Judgment**

  Be as objective as possible when evaluating whether your outside activity, financial interest, or receipt of business gifts and entertainment could lead to divided loyalties. When considering these types of engagement, consider the following:

  → Could this situation create an incentive for me that could affect decisions I make on behalf of NortonLifeLock?

  → What could my co-workers think about the impact of this situation on how I do my job?

  → How could this look to someone outside NortonLifeLock like our partners, customers, or shareholders?

  → Could you be comfortable if this were reported online or in the newspaper, and how could it look to the public?
ACT WITH INTEGRITY

What kind of information can I not trade on or share, and why does it matter?

Examples of this information include:

→ Earnings and earnings forecasts
→ New products or developments
→ Information regarding any contracts or business relationships
→ Litigation or investigations
→ Acquisition or divestiture discussions

Trading on or sharing this information is against the law and may subject you personally to disciplinary actions, penalties, or even jail time.

PERSONAL USE OF COMPANY RESOURCES

NortonLifeLock provides a wide variety of assets for its employees to use when conducting company business, including computers, mobile devices, communications systems, and other equipment and materials. You can use some of these resources for incidental personal activities, but you need to keep this usage to a minimum and to comply with all company policies and guidelines on Internet usage. Excessive personal use of company resources increases our costs and expenses, reduces availability of the resources for our business needs, and may adversely affect your job performance and the performance of NortonLifeLock. You may not allow other people, including your friends or family, to use company resources for any purpose. You may not use any company resources for illegal activities or inappropriate purposes such as visiting Internet sites that contain sexually explicit content, for the purpose of gambling, or that advocate intolerance of others. NortonLifeLock corporate cards are only to be used for business purposes. You may not use your American Express corporate card for personal charges under any circumstances. Refer to the Global Travel & Expense Reimbursement Policy for more information.
PARTNER TO WIN

We strive for extraordinary outcomes that grow our business and exemplify NortonLifeLock’s values.

We unite as ONE TEAM to protect our customers like no one else can—our customers are at the center of everything we do. NortonLifeLock conducts its business fairly, legally, and with INTEGRITY. While working for the best interests of the company, we have a duty to be ETHICAL, LAWFUL, and PROFESSIONAL in our dealings with customers, channel partners, suppliers, other business partners, and competitors, as well as our colleagues. Although laws and customs vary from country to country, NortonLifeLock expects that all employees comply with local laws, regulations, company values, and standards of honesty and fairness in carrying out their duties on behalf of NortonLifeLock.

CONTRACTING PRACTICES

When NortonLifeLock is selling or buying products and services, or entering into other commitments, NortonLifeLock must embody the rights and obligations of each party in appropriate written contracts. Side agreements of any kind are prohibited.

You may not commit NortonLifeLock to undertake any performance, payment, or other obligation unless you are authorized under the appropriate company delegation of authority policies, including the Global Signature Authority Policy and the Global Financial Approval Authority Policy (GFAAP). You may not enter into any agreement or engage in any activity that may violate applicable law.

WORKING WITH CUSTOMERS, PARTNERS, AND SUPPLIERS

We must take care to maintain the confidence, respect, and trust of our customers, partners, suppliers, and government organizations by conducting business responsibly. We must be committed to acting ethically, lawfully, truthfully, professionally, and with integrity in all business dealings whether selling or buying, entertaining, or representing the company in any other capacity, including during business travel or external events. Refer to our Anti-Bribery and Corruption Policy and NortonLifeLock Partner Development Fund Policy for more information.
PARTNER TO WIN

WORKING WITH CHANNEL PARTNERS

NortonLifeLock resellers, distributors, and other channel partners are important to company sales and marketing strategies. Channel partners, however, are independent businesses, and company relationships with them are subject to antitrust, competition, and other laws. NortonLifeLock may establish channel pricing and programs to help channel partners in selling company products and services in accordance with company policies and applicable laws. Refer to the Global Antitrust and Competition Policy for more information.

DOING BUSINESS WITH THE PUBLIC SECTOR

Doing business with government customers requires you to follow additional rules beyond those that apply to commercial clients. What is acceptable in the commercial business environment may be unacceptable when interacting with government officials. We never want to appear as if we are trying to bribe or to exercise improper influence on government customers. For this reason, if your work involves a government or public sector customer, you are responsible for knowing and complying with the applicable requirements in the United States and in the local country. A violation of such requirements can lead to serious financial and reputational harm and result in NortonLifeLock being prohibited from doing business with the government. View our Global Anti-Bribery and Corruption Policy for more information.

Who is a “Government Official”?

A “government official” is any person who works for or is an agent of a government-owned or a government or state-controlled entity. Examples that may not be obvious include state run schools, hospitals, telecommunications services, and financial institutions. If you are unsure whether you might be dealing with a government official, or have any other questions on complying with anti-bribery laws, you should contact Ethics & Compliance for guidance.

ANTI-CORRUPTION

- **We do not bribe.** We are open, honest, and direct. We do not offer, give, or accept money or anything of value from third parties, including customers and partners, to improperly obtain or retain business, secure an improper advantage, or otherwise influence them to act improperly. This applies to engagements with third parties from both commercial and public sectors. We act in compliance with all anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.
Our third parties must also do the right thing. We do not use third parties to take actions that we cannot otherwise take ourselves. We raise a red flag and report any concerns.

We maintain accurate books and records. We clearly and accurately represent how we spend our money, no matter how large or small the transaction.

BUSINESS GIFTS AND ENTERTAINMENT

*We spend company resources responsibly.* We only offer, provide, and accept gifts, meals, travel, and entertainment to create goodwill—never in conjunction with a business deal or to otherwise improperly influence a third party. Our [Global Anti-Bribery and Corruption Policy](#) sets specific limits on the value of, and the approvals required for, business amenities that may be given or received. As a general rule you can’t offer or give anything of value (e.g. free product, gifts, meals, entertainment, awards, travel, etc.) that
PARTNER TO WIN

exceeds the recipient employer’s limits or the thresholds established in our Global Anti-Bribery and Corruption Policy, whichever is less, unless you have pre-approval from Ethics & Compliance.

**Be careful to avoid:**

- Giving cash or cash equivalent at any time.
- Offering a meal or entertainment to a government customer in excess of our policy limits, particularly when there is a deal in the pipeline, because it could be perceived as a bribe or attempting to influence the deal.
- Providing unnecessary, excessive, or luxurious travel, meals, or entertainment for customers, even commercial customers.
- Entertaining colleagues, business partners, and customers in an inappropriate and/or unprofessional manner.

**COMPETITORS**

As a global business, we succeed by competing vigorously and fairly in the marketplace in full compliance with applicable antitrust, competition, and other laws and regulations designed to promote fair competition, and free trade, and encourage ethical and legal behavior among competitors. Refer to the Global Antitrust and Competition Policy for more information.

“I just closed a major deal with a strategic partner. A week later, I find a wrapped present on my desk from that partner. Am I allowed to accept the gift?”

The answer is generally yes, so long as the gift falls within the following parameters:

- Not cash or cash equivalent
- Under value limits in our Global Anti-Bribery and Corruption Policy
- Infrequent
- Customary in nature as a business gift
- Does not have appearance of attempt to influence
- No sense of obligation or reciprocity
- Permitted by law
- Does not violate the partner’s gift policy

Refer to our Global Anti-Bribery and Corruption Policy for more information. If you have any questions or would like to discuss any particular situation, please contact Ethics & Compliance.
PARTNER TO WIN

- We do not make agreements, express or implied, with any NortonLifeLock competitor to set pricing, limit output, divide territories, or allocate customers for competing products or services. We do not discuss with competitors any proprietary and/or confidential information such as non-public or future pricing information, terms of sale, costs, margins, inventories, marketing plans, or similar confidential information.

- We must have timely and complete information about industry developments to stay competitive. We only obtain competitive information by honest and legal methods.

- Our reputation is built on the quality and value of our technology and services, not by trash-talking the competition. Statements about competitors need to be fair, factual, complete, and provable.

SUPPLIERS

*Our suppliers are of great strategic importance. We choose suppliers based on the merits of their products, services, prices, and business practices.*

- You are required to follow company policies in choosing suppliers on a basis that serves our interests and protects our reputation, with the assistance of the Procurement Team and in line with the Global Procurement Policy.

- You may not establish a business relationship with a supplier if its business practices violate local laws or basic international principles relating to labor standards or environmental protection.

- You must always deal with suppliers in a professional and fair manner, properly document all transactions, and manage supplier relationships in accordance with the best interests of NortonLifeLock and in accordance with applicable internal policies and procedures.

- You are responsible for working with the Procurement team to negotiate and obtain the best possible pricing and keep it confidential from other third parties.

Red Flags

- **Discussing** with competitors non-public information, such as pricing

- **Obtaining** non-public information by illegal means

- **Requesting** that a competitor’s current or former employees provide confidential information

- **Misrepresenting** yourself or who you work for when seeking competitive information

- **Engaging** others to obtain non-public information through illegal means

- **Interfering** in the fulfillment of an order to a competitor
YOU ARE NORTONLIFELOCK

Every team member is an ambassador for NortonLifeLock and is expected to embody our values and safeguard our brand and reputation.

This includes compliance with all company policies, both on and off the job, inside and outside the office (including during business travel and external events), and in all circumstances at which employees, business partners, and/or customers are present.

COMMUNICATING WITH THE PUBLIC

Every team member must keep all non-public information CONFIDENTIAL. Information requests from the media, financial analysts, investors, industry analysts, or legislative entities should be referred to Public Relations, Marketing, Investor Relations, Analyst Relations, or Government Affairs. We need to be especially careful about information that could potentially influence investors or have an impact on the market for company stock, including forward-looking information such as projections of orders, revenue, or earnings. This information may be released only through designated representatives in NortonLifeLock’s Public Relations or Investor Relations department. Press releases and all media contacts are to be made only through designated Public Relations representatives assigned to your business, operation, or function in compliance with company policies. Unless you receive approval from Public Relations, you must decline the opportunity to respond to any inquiries for news or information about NortonLifeLock and refer the request to the appropriate NortonLifeLock spokesperson. You must TAKE CARE to not create any impression that you are speaking on behalf of the company in any personal communications such as blogs, user forums, chat rooms, social media posts, or bulletin boards.

ADVERTISING, MARKETING, AND SALES PRACTICES

You can’t make false or misleading statements about company products or services, or those of competitors, in marketing or sales activities. See the Unfair, Deceptive, or Abusive Acts or Practices Policy for details.

PROTECT OUR BRAND

Our brand is a VALUABLE ASSET that other companies may want to exploit. We are all RESPONSIBLE for protecting our brand from unauthorized and inappropriate use. You may not give permission to any supplier or
other party to use the NortonLifeLock name, logo, or other branding in its advertising, promotional materials, customer references, or the like, without approval from Marketing.

**POLITICAL CONTRIBUTIONS AND ACTIVITIES**

Government policies affect the commercial environment, and NortonLifeLock is subject to legislation and regulation that affect how we conduct business and generate **VALUE** for our investors. We engage in the political process with a view to the **LONG-TERM INTERESTS** of the company and to protect our interests.

- **NortonLifeLock Political Contributions.** As a company, NortonLifeLock may support selected Federal candidates and their campaigns within the U.S. No NortonLifeLock funds or other assets may be used for political contributions outside the U.S., unless expressly approved in advance and in writing by Government Affairs and Ethics & Compliance. All of NortonLifeLock’s contributions are disclosed on our public website.

- **Personal Political Activities.** While you are encouraged to participate in your community and the political process, you can’t create the impression that you are speaking or acting for or on behalf of the company. You can make personal contributions to political candidates of your choice, but NortonLifeLock cannot reimburse you for personal contributions.

- For more information see our [Global Political Contributions Policy](#).
SPEAK THE TRUTH

We do what we say we will do. We speak the truth and are honest in our dealings.

FINANCE AND ACCOUNTING PRACTICES

As a publicly traded company, we adhere to strict accounting PRINCIPLES and STANDARDS of financial reporting. You must accurately and completely record any financial information related to the company’s revenues and expenses. The Audit Committee of NortonLifeLock’s Board of Directors is directly responsible for the appointment, compensation, and oversight of the work of the company’s independent auditors and works cooperatively with NortonLifeLock’s independent auditors in their review of NortonLifeLock’s financial statements and disclosure documents. Violations of laws associated with accounting and financial reporting can damage our REPUTATION, and can also result in fines, penalties, and even imprisonment. You should promptly report to Ethics & Compliance any conduct that you believe to be a violation of law or business ethics or of any provision of this Code, including any transaction or relationship that reasonably could be expected to give rise to a perceived conflict.

RECORDS MANAGEMENT

We create, retain, and dispose of documents, business records, and information assets (paper and electronic) as part of our normal course of business. For business, accounting, and legal reasons, our company records must be properly managed in compliance with our Global Records Management Policy and Records Retention Schedule, unless it is subject to preservation instructions issued by NortonLifeLock Legal. For more information regarding records management, contact Legal Operations.

LAWSUITS, LEGAL PROCEEDINGS, AND INVESTIGATIONS

You are required to contact NortonLifeLock Legal right away if you receive a court order or a court issued document, or learn of a threatened lawsuit, legal proceeding, subpoena, or investigation brought by private parties or by any government agency relating to the company. NortonLifeLock Legal will handle the engagement of outside legal counsel. Records relevant to preservation instructions issued by NortonLifeLock Legal must not be altered, or destroyed, and must be promptly turned over to NortonLifeLock Legal upon request. Under U.S. law, attorney-client privilege applies to communications made in confidence to company attorneys to obtain legal advice, as well as communications from company attorneys providing their advice regarding company activities. Communications should not be forwarded or copied except under the direction of a NortonLifeLock attorney, and should be shared with as few company employees as possible, on a need-to-know basis, and not shared with any third parties. If you are involved on NortonLifeLock’s behalf in a lawsuit or other legal dispute, you must avoid discussing it with anyone inside or outside of the company without prior approval of NortonLifeLock Legal and must cooperate fully...
SPEAK THE TRUTH

with NortonLifeLock Legal in the course of the lawsuit, legal proceeding, or investigation. You are also required to cooperate fully with Ethics & Compliance in the course of any investigation. This includes maintaining confidentiality over the investigation and not disclosing it with anyone inside or outside the company without prior approval of Ethics & Compliance. Failing to cooperate or deliberately providing false information in connection with a lawsuit, legal proceeding, or external or internal investigation is a serious offense and may be grounds for disciplinary action, up to and including termination of employment.

NortonLifeLock Policies. Our policies, including Finance and Accounting policies, can be found in the Policy Repository.

Red Flags

Some examples of red flags that you should speak up about include:

- Discussing with competitors non-public information, such as pricing
- Inaccurately stating financial records, such as overstating travel and entertainment expenses, or submitting erroneous time sheets or invoices
- Releasing confidential information to unauthorized third parties
- Failing to create or follow adequate controls to protect assets from risk or loss
- Making personal contributions to political candidates that are then expensed back to NortonLifeLock
- Discussing company proprietary or confidential information with customers or suppliers
- Using proprietary or confidential information from a prior employer or competitor for NortonLifeLock’s benefit
- Taking NortonLifeLock’s proprietary or confidential information for use in an outside role or future position at another company
- Passing on or divulging proprietary or confidential information to outsiders, for example, on Internet blogs or social media
- Speaking to a member of the press without prior approval
- Using company computers to visit websites that contain inappropriate or unprofessional content
YOU HAVE A VOICE

HOW TO RAISE A CONCERN

Speaking up isn’t always easy. Questioning a colleague’s INTEGRITY can be emotional and personal, and it can be hard to stay OBJECTIVE. The goal is to bring concerns into the open as early as possible so that any problems can be resolved quickly, preventing any further harm. This is why it’s important to speak up, and to ask questions. We want to make sure that every team member has a VOICE and the CONFIDENCE to use it. We offer access to a number of different channels to get answers to questions, and to raise any potential concerns. Remember—it is important and required to voice your good faith concerns through these appropriate channels. This includes any potential violations of our Code, policies or procedures, or the law. If you believe you’re being asked to commit or support an illegal or unethical act, we encourage you to speak up promptly. When you feel/think/see/believe/wonder/worry about something you feel may be illegal or unethical—speak up right away! Ignoring a problem makes you part of that problem.

Ask yourself:

→ Is this legal?
→ Is this ethical?
→ Does it follow company policy?
→ How will the decision affect others, including customers, shareholders, suppliers, partners, competitors, the community, and other employees?
→ How will the decision look in the eyes of others?
→ How would you feel if the decision was made public?
→ Have you fully explored the implications of this decision?
→ Would additional advice be helpful?

NortonLifeLock takes all reports of violations of this Code seriously. We investigate all reports and will take appropriate action to ensure prompt and consistent enforcement of violations of the Code or our non-retaliation policy.
YOU HAVE A VOICE

YOU’VE GOT SUPPORT

- **Your Manager**: Managers at NortonLifeLock are expected to maintain an *Open Door Policy* when it comes to your questions and concerns, and to take action as quickly as possible. Managers are responsible for escalating concerns to *Ethics & Compliance*—this is not something you need to do yourself if you’ve reported those concerns to management.

- **Ethics & Compliance**: You can also turn to *Ethics & Compliance* directly and confidentially. You can share your concern verbally or in writing, and if you feel it’s necessary, you can do it *anonymously*. Direct reporting may be especially appropriate if the suspected violation involves financial, accounting, auditing, banking, or anti-bribery areas due to confidentiality concerns.

- **People & Culture**: People & Culture is always an outlet for employees and is also responsible for escalating concerns to *Ethics & Compliance*.

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**EthicsLine**

To report a concern:

- nortonlifelock.ethicspoint.com
- U.S./Canada: 1-866-833-3430
  (Global numbers available online)
- • Confidential • Global
- • Interpreters Available
- 24 Hours A Day • 7 Days A Week

**NON-RETALIATION**

You will never be penalized for speaking up when you report a possible violation of NortonLifeLock’s policies or for cooperating with an investigation. On the other hand, knowingly making false or malicious reports will not be tolerated, and anyone filing such reports will be subject to appropriate disciplinary action. Each of us needs to do the right thing when it comes to reporting concerns, including suspected violations of the law or NortonLifeLock policies and incidents of harassment or discrimination. If you believe you are being retaliated against, contact Ethics & Compliance immediately.