



India Corporate Responsibility Policy

Guiding Principles

NortonLifeLock is dedicated to helping secure the devices, identities, online privacy, and home and family needs of nearly 50 million consumers, providing them with a trusted ally in a complex digital world. We are dedicated to each other, our customers, our business, and society. We bring together our people, passions, and technology to support social priorities and aim to make the world a better, safer place.

Background

The Indian Companies Act, 2013 (“Act”) has introduced a regulatory framework for carrying out Corporate Social Responsibility (“CSR”) activities in India. The Act mandates that “qualifying companies” shall, amongst other things, adopt a Corporate Responsibility policy for carrying out CSR activities in India.

Accordingly, this Corporate Social Responsibility Policy (“Policy”) applies to the following companies of NortonLifeLock group in India, who are currently meeting the threshold limits set out in section 135(1) of the Act:

- NortonLifeLock Software Solutions Private Limited
- NortonLifeLock Software and Services India Private Limited
- NortonLifeLock India Private Limited

Since all these NortonLifeLock companies form a part of the same group, a common policy document has been adopted. However, each NortonLifeLock company will be separately reporting on projects and programs and complying with the requirements of the Act and the rules thereunder (Rules).

The Board of Directors at (“the Board”) has adopted this Corporate Social Responsibility Policy (“CSR Policy”) which has been framed in accordance with the provision of Section 135 of the Companies Act 2013 (“Act”) read with Companies (Corporate Social Responsibility) Rules, 2014 (the “CSR Rules”) and Amendment Rules, 2021 and other applicable provisions / rules, if any, of the Companies Act, 2013 or subject to such modifications and re-enactment thereof from time to time notified by the Ministry of Corporate Affairs, Government of India.

Policy

A. CSR Objectives and Focus Areas

We focus our efforts on community development through various initiatives in the best interest of the poor, deprived and marginalized populations to build a better tomorrow for society. We pursue CSR programs primarily in areas that fall within the economic vicinity of the Company’s operations to enable close supervision and ensure opportunities for employee engagement and maximum impact. We align programs with our CR and business objectives.

B. Scope

This Policy covers current as well as proposed CSR activities to be undertaken by NortonLifeLock India and examining their alignment with Schedule VII of the Act. It includes the procedures to be followed for carrying out such CSR activities. This Policy does not apply to CSR activities of NortonLifeLock outside of India. Any changes to this Policy can be made only on the recommendation of the respective CSR Committees of NortonLifeLock India and approval of the respective board of directors of NortonLifeLock India.



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C. Focus area

As a company engaged in providing services with significant societal benefit, we are committed to conducting our business with attention to and respect for ethical operation, the environment, and positive societal impact.

NortonLifeLock's CR platform is centered around:

- Community impact
 - Data Privacy and Protection
 - Cyber Safety Education and Training
- Employee Volunteering and Giving
- Diversity, Equity, and Inclusion
- Environmental Stewardship

D. CSR activities in India:

NortonLifeLock India has been actively working with various non-governmental organizations in India on corporate social responsibility activities. NortonLifeLock India has carried out several projects involving active participation and volunteering by employees. NortonLifeLock intends to work on programs that are centered around our focus areas and any other sector relatable to the activities given in Schedule VII of the Act and which the CR Committee of NortonLifeLock India deems suitable in each case.

The India CSR Committee will review the sectors from time to time and make additions/ deletions/ clarifications to the above sectors. These sectors are relatable to one or more items enumerated in Schedule VII of the Act. In addition to the above activities, NortonLifeLock India may also implement or adopt programs or projects under which employees are encouraged to volunteer for CR activities as per the company's Service Time policy.

Activities completed by NortonLifeLock India in the normal course of business are not intended to be covered in the activities set out above. Any surplus arising from CR projects or programs or activities shall not form part of the business profits, benefit the employees of the company, or be contributed to any political party.

E. CSR Budget

The CSR budget will be allocated as per the provisions of the Act. The Company Board of Directors will ensure that in each financial year the Company spends at least 2% of the average Net Profit made by the Company during the immediately preceding three financial years. If the amount indicated above is not spent in its entirety in that Financial Year, the reasons will be reported in the Annual Report and signed off by the Board of Directors.

F. Governance and Management

The governance structure for CSR programs undertaken by NortonLifeLock shall be as follows:

I. Responsibilities of the Board of Directors:

- a. Appoints a Corporate Social Responsibility Committee ("CSR Committee") to effectively carry out the objectives described above
- b. Approves the CSR Policy after considering the recommendations made by the CSR Committee



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- c. Ensures that the disbursed funds are utilized for approved purposes and in the manner certified by the person in charge of financial management
- d. Monitors the smooth implementation of ongoing programs within the approved timelines / year-wise allocations and modifies on-going programs, as necessary to ensure implementation within the permissible time limit
- e. Ensures disclosure of the composition of the CSR Committee, the CSR Policy and programs approved by the Board in the Annual Report and on the Company's website.

ii. Responsibility of CSR Committee:

- a. Meets at least quarterly to discuss and review CSR programs and Policy. A quorum of two members is required for the proceedings to take place. Other meetings of the CSR Committee can be convened as and when deemed appropriate. The Committee members may attend the meeting either physically or virtually as permitted under the Regulations.
- b. Formulates and recommends a CSR Policy to the Board
- c. Formulates and recommends to the Board, an annual action plan in furtherance of the CSR policy, which includes:
 - the list of CSR programs that are approved to be undertaken
 - the manner of execution of such programs
 - the modalities of utilization of funds and implementation schedules for the programs
 - monitoring and reporting mechanism for the programs; and
 - details of need and impact assessment, if any, for the programs undertaken.
- d. Recommends the amount of expenditure to be incurred to carry out CSR programs
- e. Adds programs to the external website
- f. Monitors the CSR policy annually and updates it, as needed.

Committee members are Madhura Deo (Madhura.deo@nortonlifelock.com) and Sriram Shanmugam (Sriram.shanmugam@nortonlifelock.com)

G. Implementation of CSR Programs

The implementation of the CSR programs is done either directly by NortonLifeLock team members or by making grants to NGO partners with established track records in their respective domains. Each program aligns with NortonLifeLock's CSR Policy.

- a. **Project Selection:** The projects to be undertaken state a problem to be addressed in the respective area. Projects have well defined goals, activities, impact on beneficiaries, expected outputs & outcomes, with clearly defined targets and budgets. Each project is evaluated on its merits either by an in-house team or an external agency. Due diligence of the implementing agency (NGO Partner) is performed in terms of track record & experience in that sector. NGO Partner submits a Concept Note for initial review and feedback. The Committee provides any feedback and recommends the project to the Board for its final approval

Memorandum of Understanding (MOU): MOU is drafted and shared with Norton LifeLock's legal for review and comment. The MOU is executed with the Implementing agency and includes defined roles, responsibilities, deliverables, commitment & consequences in case of any breach. The MOU includes a disbursement schedule aligned with the project milestones.



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- b. **Monitoring:** The CSR Committee monitors the implementation of the CSR projects through in-house teams or through a third party. Monitoring includes field visits, progress reports and

- c. interaction with beneficiary communities, as necessary. Status reports are presented to the CSR Committee every quarter.

H. Disclosures

NortonLifeLock will publish an annual report containing particulars specified in Annexure I or Annexure II of the Act, as applicable. The composition of the CSR Committee, and CSR Policy and Projects approved by the Board will be made available on NortonLifeLock website.



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Exceptions & Delegations – None

Definitions - Each of the NortonLifeLock companies listed above are referred to in this Policy as “NortonLifeLockIndia”, while “NortonLifeLock” refers generally to NortonLifeLock group.

Compliance – The Indian Companies Act, 2013 (“Act”) has introduced a regulatory framework for carrying out Corporate Social Responsibility (“CSR”) activities in India. The Act mandates that “qualifying companies” shall, amongst other things, adopt a Corporate Responsibility policy for carrying out CSR activities in India.

Reporting concerns - If you believe this Policy may have been violated, immediately submit a confidential report to the Office of Ethics and Compliance online through [Ethics Line](#) or over the phone (US/Canada) 1.866.833.3430, [international numbers](#) listed on Ethics Line). Reports may be made anonymously through Ethics Line online.

You may also choose to report your concern to your manager or HR. Managers have a responsibility to ensure that all reports are escalated and responded to appropriately.

NortonLifeLock will not tolerate retaliation against anyone, who in good faith, reports a concern or cooperates with a compliance investigation, even when allegations are found to be unsubstantiated

Related Policies and Information- India CR Process Overview

Approval Matrix

Policy Manager	Amanda Davis
Policy Approver	Madhura Deo Sriram Shanmugam Kim Allman
Last Revision Date	June 25 th 2021
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