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.

The Indian Companies Act, 2013 ("Act") has introduced a regulatory framework for carrying out Corporate Responsibility ("CR") 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 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:

- Symantec Software India Private Limited
- Symantec Software Solution Private Limited
- Symantec Software and Service 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).

Policy

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 CR activities. This Policy does not apply to CR activities of NortonLifeLock outside of India. Any changes to this Policy can be made only on the recommendation of the respective CR Committees of NortonLifeLock India and approval of the respective board of directors of NortonLifeLock India.

Policy Description

1. **Corporate Responsibility at NortonLifeLock**: NortonLifeLock has four focus areas for CR. These focus area categories serve the objective of creating a sustainable and diverse future for the technology industry. In order to effectively pursue our CSR activities, NortonLifeLock identifies and reaches out to those organizations that best align with its giving priorities and objectives. These priorities include:
   a. Science, Technology, engineering, and math education: equal access to education;
   b. Diversity;
India Corporate Responsibility Policy

c. Online safety; and
d. Environmental responsibility.

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 organized into three key pillars:

a. Our People, which includes employee satisfaction, talent management, and diversity and inclusion;
b. Your Information, which includes cybersecurity, online safety, and privacy:
c. The World, which includes climate change, supply chain, and community investment.

2. **CR 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.

Going forward NortonLifeLock India intends to work in the following targeted sectors:

a. Education
b. Digital literacy
c. Cyber safety
d. Mentoring for technology careers
e. Technology awareness/ availability
f. Software donations
g. Diversity
h. Community development
i. 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 CR 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 and for which NortonLifeLock India may pay salaries as per their normal entitlement (in proportion to the company’s time/ hours spent specifically on CR).

For the avoidance of doubt:

a. Activities completed by NortonLifeLock India in the normal course of business are not intended to be covered in the activities set out above;
b. Any surplus arising out of the CR projects or programs or activities shall not form part of the business profits of NortonLifeLock India.

3. **Execution Modalities**: The process for screening and approval for potential CSR projects/ programs will be done at 3 levels:
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a. Corporate Responsibility Committee (“CR Committee”) - In accordance with the provisions of the Act and the rules, NortonLifeLock India has formed a Corporate Responsibility Committee of the board of directors of NortonLifeLock India;

b. Advisory Committee – Apart from the CR Committee, NortonLifeLock India has formed an advisory committee consisting of officers from different functions within NortonLifeLock;

c. Board of directors of each NortonLifeLock India entity.

Generally, each potential CR project/ program will go through the following process:

• The Advisory Committee will identify suitable organizations/ implementing agencies/ companies to devise and plan a project/ program in the sectors set out above. Such organizations/ implementing agencies/ companies need to be:
  a. registered as a non-profit, charitable and tax-exempt organization under the applicable Indian laws, rules and regulations (including but not limited to the necessary registrations and/ or permissions under Foreign Contribution Regulation Act, 2010, registration under section 80G of the Income Tax Act, 1961, as may be modified or replaced from time to time);
  b. Able to document the proper official charitable registration identifications;
  c. Not be political in its primary purpose;
  d. Not be religious in its primary purpose;
  e. Maintain a full and complete non-discrimination policy, including a policy against discrimination based on gender, age, sexual orientation, religion, race, national origin, language and physical handicap.

Further such organization/ implementation agencies / companies cannot be:

  a. Individuals
  b. Private foundations
  c. Veterans / Fraternal organizations
  d. Sports organizations
  e. Individual schools
  f. Religious organizations (such as churches, temple, mosques, seminaries)
  g. Political organizations
  h. Organizations having unlawful discriminatory practices

• The advisory committee evaluates such organization to ensure they meet NortonLifeLock’s global standards for partnering. The Advisory Committee members:
  a. Meet the organization (local team and corporate team) to discuss potential project ideas;
  b. Vet the organization to make sure they are valid, and they allocate the funds responsibly;
  c. Get an overview of project support from organization;
  d. Discuss with them again to refine the project support.
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- Once finalized the Advisory Committee sends a project/program proposal to the CR Committee along with an overview of the project costs/spends for consideration;

- The CR Committee then considers each such proposal considering the provisions of the Act and Rules. If the proposal is approved, the CSR Committee will recommend the proposal to the board of directors of NortonLifeLock India for approval.

- The board of directors approves such proposals (including the CR spends associated with it) by passing a board resolution.

4. **Monitoring**: The Advisory Committee will work together to ensure effective implementation and monitoring of the projects approved by the CR Committee.

   The Advisory Committee will work throughout the year to implement the approved projects/programs and ensure funds are appropriately allocated to the projects/programs. The Advisory Committee will also ensure the organizations/implementing agencies/companies provide a 6 month and 12-month impact report for their work and employee volunteering activities (if any) are properly coordinated.

5. **Publication**: per the Rules, the contents of this Policy shall be included in the directors’ report and the same shall be displayed on the website of NortonLifeLock.

**Exceptions & Delegations**

None

**Definitions**

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

**Compliance**

None

**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 EthicsLine or over the phone (US/Canada
1.866.833.3430, international numbers listed on EthicsLine). Reports may be made anonymously through EthicsLine 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**

None
## Approval Matrix

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
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<tbody>
<tr>
<td>Policy Manager</td>
<td>Kimberly Bishop</td>
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<tr>
<td>Policy Approver</td>
<td>Kimberly Allman</td>
</tr>
<tr>
<td>Last Revision Date</td>
<td>March 11, 2020</td>
</tr>
<tr>
<td>Effective Date</td>
<td>March 11, 2020</td>
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