



NortonLifeLock Modern Slavery Act FY20 Statement

On March 26, 2015, The Modern Slavery Act 2015 was passed into law in the United Kingdom. This law requires all business entities that complete business, or part of a business, in any part of the United Kingdom and operate above a specific turnover threshold, to prepare and publish a slavery and human trafficking statement for each financial year of the organization. NortonLifeLock Inc. (NASDAQ: NLOK), a global leader in consumer Cyber Safety, fully supports the aims of the legislation.

The California Transparency in Supply Chains Act of 2010 requires retail sellers and manufacturers with annual worldwide gross receipts over \$100 million doing business in the state of California to publicly disclose their efforts to eradicate slavery and human trafficking from their direct supply chains.

The California Transparency in Supply Chains Act of 2010, which applies to more than 3,000 companies - many of which are large consumer brands - aims to give consumers the information to help them make purchasing decisions that will help eradicate slavery and human trafficking. NortonLifeLock supports the aims of the legislation and, in compliance with the California Transparency in Supply Chains Act has published a [disclosure statement](#).

NortonLifeLock is committed to respecting human rights wherever we do business around the globe. We believe in the importance of upholding human rights, including the rights to privacy and freedom of expression as well as human rights in the supply chain. We engage with our stakeholders to continually refine our approach and related policies and practices. Our [Human Rights Policy Statement](#) builds on our commitment to uphold the ten principles of the [United Nations Global Compact](#) and is aligned with the [Universal Declaration of Human Rights](#). NortonLifeLock seeks to protect and advance human dignity and human rights in our global business practices. We comply with the requirements of the United States Government regulation on combatting trafficking in persons.

In 2006, NortonLifeLock (previously Symantec Corporation) announced our commitment to support the ten principles of the [United Nations Global Compact](#) (UNGC). NortonLifeLock encourages all companies to adopt the UNGC's ten principles to protect human rights, uphold ethical labor conditions, preserve the environment, and combat corruption. In the years since we became a member, we have worked diligently to strengthen our own performance and share best practices and thought leadership with others.

NortonLifeLock is aware of concerns that certain minerals mined in conflict areas in the Democratic Republic of the Congo ("DRC") and adjoining countries ("Covered Countries") may make their way into the supply chains of products used in the electronics industry; and we are committed to excluding the usage of these conflict minerals in our products and we support the aims of the Dodd Frank Wall Street Reform Act. View our [Conflict Mineral Policy](#) and our latest [Conflict Mineral Report](#).

NortonLifeLock's [Global Supplier Code of Conduct](#) is applicable to all NortonLifeLock suppliers of products and services. Suppliers are responsible for ensuring that all of their employees and any subcontracted party performing work for NortonLifeLock are informed and agree to comply with the Global Supplier Code of Conduct.

As of NortonLifeLock's fiscal year ended April 3, 2020, 100% of our Tier 1 physical product suppliers have agreed to our corporate responsibility requirements. For the fiscal year ended April 3, 2020, our two main suppliers who manufacture and distribute over 95% of physical product globally completed the RBA Self-Assessment Questionnaire and shared their results, completed forced labor training, answered a Human Rights Questionnaire and are considered "low risk" on the Dun and Bradstreet Human Trafficking Index. Our aim is to further assess the other Tier 1 suppliers who supply the remaining 5% of our physical products.

All of our policies and statements are available to employees via our website. Employees are expected to report

any NortonLifeLock Code of Conduct or human rights violations to their manager, anyone in their management reporting chain, a Human Resources representative, or the Office of Ethics and Compliance at XRM-ethicsandcomplnc@nortonlifelock.com to [NortonLifeLock's EthicsLine](#) which is run by an external, independent third party. Employees may report concerns anonymously and toll-free or online at [EthicsLine's](#) website. Customers, suppliers, partners, shareholders, indeed any stakeholder, may also use the EthicsLine to inform NortonLifeLock of suspected ethical conduct violations. Employees are required to complete NortonLifeLock Code of Conduct Training at regular intervals.

As approved by the NortonLifeLock Inc. Board of Directors on 6. October 2020


Sue Barsamian (Oct 14, 2020 13:56 PDT)

Sue Barsamian
Chair of the Nominating and Governance Committee of the Board