

SAFEGUARDING TRUST

Our Code of Conduct





A Message from Vincent Pilette



Team,

We have an important vision at NortonLifeLock: to be the trusted brand in Cyber Safety by protecting consumers and giving them control of their digital lives.

Today's consumer expects and deserves a partner they can trust to always do the right thing—a company that embraces strong principles and ethics.

The NortonLifeLock Code of Conduct guides how we operate as individuals and as a team. With our values and standards as the framework, the Code outlines the expectations we set for ourselves according to our business practices and policies. The Code of Conduct also helps us to be accountable to each other and to our customers.

A high standard of ethics and good governance is NortonLifeLock's greatest strength as we advocate, innovate, communicate, and execute as a team.

Vincent

CEO, NortonLifeLock Inc.

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SAFEGUARDING
WITH INTEGRITY

Safeguarding with Integrity

At NortonLifeLock, our Vision and Mission define what we want to achieve, and our Values define who we are. To make good on our Vision, we rely on our Values to inform the decisions we make and the actions we take.

Our Vision

Our vision is to be the trusted brand in Cyber Safety by protecting consumers and giving them control of their digital lives.

Our Mission

Our mission is to build a comprehensive and easy-to-use integrated portfolio that prevents, detects, and responds to cyberthreats and cybercrimes in today's digital world.

Our Values

As a market leader in Cyber Safety, we serve our customers as a small and agile company. As part of our new journey, we are doing the work to define what we want to achieve as a company and how we want to work as a team.

As we
continue
to develop
our values
together, we
embrace
these ideals:

ADVOCATE

Think Consumer First

We fully embrace the customer experience. We consider how our actions impact customers' digital lives. We make decisions that serve our customers.

BE EMPOWERED

Own It

We take initiative to lead, regardless of job title. When we see an opportunity to delight our customers or improve the business, we speak up. We are accountable to each other: we own our work and our results.

COMMUNICATE

Be Open & Authentic

We treat one another the way we want to be treated. We build cross-functional and inclusive connections to stay aligned and move faster. We operate with integrity.

EXECUTE

Scrappy & Smart

If we see a better way of doing something, we find a smart way to make it happen, fast. We are agile in adapting to meet new challenges. We are on a constant learning journey.

WIN TOGETHER

Innovate & Grow

We welcome diverse perspectives and seek and act on feedback. We keep our commitments. We champion the unique value of every individual; diversity fuels innovation.



TRUSTING
THROUGH
TRANSPARENCY

Trusting Through Transparency

Safeguarding Trust is the theme of our Code of Conduct. The Code connects our values to specific daily behaviors. It is a tool to help us all make decisions that benefit our business and protect us from risk.

Living Our Values

A values-based culture is one where integrity thrives. It allows us to delight our customers, celebrate the unique contributions of every employee, and grow the business. It also reinforces our reputation as an ethical company, one that has the trust of its members, markets, and communities.

Staying true to our values ensures we are aligned as a team to deliver on our mission.

Being Accountable

We live our values when we:

- Read the Code of Conduct.
- Use it as our guide.
- Ask for help when in doubt.
- Apply our best judgment.

Every decision we make should safeguard trust—the trust our customers have in their online security and the trust our stakeholders have in our commitment to doing business the right way. We are responsible for being self-starters and holding ourselves to the highest standards of ethical and professional behavior.

Special Responsibilities of People Leaders

At NortonLifeLock, we expect every employee to demonstrate our values and uphold our Code. In addition, leaders must be active listeners and role models who:

- Respect and value the diverse perspectives, backgrounds, and ideas of all employees.
- Maintain a safe, positive, and ethical work environment.
- Behave and manage others in a way that honors NortonLifeLock's core values.
- Hire, promote, and delegate in a lawful and ethical manner.
- Understand key company policies and compliance procedures.
- Model integrity and transparency when handling challenging situations.
- Provide training and resources.
- Identify and reduce ethics and compliance risks.
- Respond appropriately and promptly to colleagues seeking help.
- Maintain accountability among all employees.
- Prevent retaliation against employees who raise concerns or who participate in investigations.
- Hold accountable any employee who raises a complaint in bad faith.
- Manage situations that may involve conflicts of interest.

Responsibilities of Business Partners and Vendors

We partner with businesses that share our commitment to transparency and putting customers first. Our reputation depends on our ability to protect the devices and identities of our customers. We expect our business partners and vendors to adhere to the standards in our [Global Supplier Code of Conduct](#) and the [Responsible Business Alliance Code of Conduct](#).

Does This Code Apply to Me?

The Code applies to each of us at NortonLifeLock. Compliance with the Code, as well as applicable laws, regulations, and company policies, is mandatory for everyone, no matter our position or location.

The Code applies to every director, officer, employee, intern, and contractor of NortonLifeLock, as well as third parties acting on behalf of the company.

Waivers

In rare cases, following the Code may cause significant hardship. In those situations, you may request a waiver of the Code. Consult with the [Global Head of Compliance](#) or use the [EthicsLine](#) if you believe you need a waiver.

Making Ethical Decisions

We all use our judgment and values when faced with ethical choices. If you are faced with an ethical dilemma at work, it is often best to reach out to your people leader. If reaching out to your immediate leader is not an option, seek help from Ethics & Compliance or People & Culture. Using this model as a guide, we can work together to determine the course of action best aligned with our values.

CAN WE DO IT?

Do the law and NortonLifeLock policies permit it?



SHOULD WE DO IT?

Is it ethical and consistent with our values and Code?



DO WE WANT TO DO IT?

Will it improve our culture, reputation, and/or business without compromising our values?



PROCEED WITH CONFIDENCE!

If the answer to any of the questions is **no**, stop and don't pursue the action.

If you are not sure about the answers to any of the questions, seek help from your people leader, Ethics & Compliance, or People & Culture.

Asking Questions, Raising Concerns

At NortonLifeLock, we win together when we're open and authentic. As part of the team, it is important you voice your concerns. We all must commit to doing our part to speak up or seek help if we believe we have seen something that violates our Code. Retaliation has no place at NortonLifeLock. We win together when we deal openly with issues that we need to address. Even if you are unsure whether what you have witnessed **is** a violation, you should still reach out to one of the following:

- **Your People Leader:** Leaders 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. Leaders are responsible for escalating concerns to Ethics & Compliance—this is not something you need to do yourself if you've reported those concerns to leadership. If you believe your people leader has not addressed a situation appropriately, seek help from one of the following resources.

- **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, or if the concern involves your people leader or someone in your management chain.
 - **To report a concern,** use our EthicsLine:
 - 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, Anonymous Option
- **People & Culture:** People & Culture is always an outlet for employee concerns and is also responsible for escalating concerns to Ethics & Compliance.

For additional points of contact, see the **Resources** section at the end of this Code.

Confidentiality and Anonymity

NortonLifeLock values open, real communication. We encourage employees to express their concerns. If you see a problem or a potential problem, speak up. It's consistent with our self-starter culture to tackle problems head on.

We make every reasonable effort to protect the identity of those involved in reports and investigations. We do not discipline employees who make reports in good faith, nor do we tolerate retaliation.

Reports can be made anonymously to the extent permitted by laws and regulations. If you wish to remain anonymous, you do not need to provide your name or other identifying information when submitting your concern through the **EthicsLine**.

Please provide as much detail as possible in your report so we can fully investigate your concern. Information such as location, individuals, transactions, events, and dates involved promotes a more efficient investigation. The company may report activity that involves potential criminal or illegal activities to the appropriate authorities.

What Happens When I Report an Issue?

When you file a report of suspected misconduct, NortonLifeLock acts promptly to investigate. To help our investigations run smoothly and ethically, all employees involved must cooperate in the investigation and provide truthful and complete information.

Zero Tolerance for Retaliation

At NortonLifeLock, we seek to create an environment that fosters trust, teamwork, and innovation. Everyone at NortonLifeLock should feel comfortable raising their concerns. To create a safe work environment, we prohibit any form of retaliation. We take reports of retaliation seriously. When investigations establish that retaliation has occurred, disciplinary action up to termination or legal action will result.

What Happens if NortonLifeLock is Involved in a Lawsuit?

If you receive a court-issued document or learn of any pending or threatened legal proceedings relating to the company, contact the **Litigation legal team** right away. Follow their guidance with respect to sharing and not sharing information as well as preserving and supplying relevant records.

Consequences of Noncompliance

When we live our Code, we foster a culture where we can innovate and grow. Failing to follow the Code or to participate in investigations and lawsuits damages that culture and holds us back. It mars our reputation and threatens our relationships with our stakeholders. In some cases, a violation could also subject NortonLifeLock to civil and/or criminal penalties. And it can result in personal consequences for all of us, up to and including termination of employment.

Misconduct that may result in disciplinary action includes:

- Violating our Code or asking others to do so.
- Failing to report a known or suspected violation of our Code or company policies.
- Refusing to cooperate fully in an investigation or legal proceeding.
- Intentionally providing false or incomplete information, or raising a concern in bad faith.
- Retaliating against another employee for reporting concerns or participating in an investigation.

How to Use the Code

Each topic in the Code is divided into three main sections:



The first section includes a **Topic and Principle Statement** that highlights our approach to doing business and fulfilling our values in connection with the topic.



The second section explains **Why Our Actions Matter** by describing why the relevant standard is important to our business and culture.



The third section identifies **How We Safeguard Trust** by listing practical examples showing how to put our values into action.

When appropriate, you may also find a Question and Answer section (Q&A) that teaches the principles through real-life scenarios.

This structure is meant to guide you through the Code, outlining the reasoning of our standards and showing us how to enact the Code in our daily lives. Our policies often go into more detail than our Code and relevant policies may be found under the Additional Safeguards heading for each topic.



Building Trust by Safeguarding Each Other

**BUILDING TRUST
BY SAFEGUARDING
EACH OTHER**

We Foster a Respectful Environment

We believe everyone has the right to be treated with dignity and respect. We strive to create supportive, harassment-free work environments.



Why Our Actions Matter

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.

How We Safeguard Trust

We foster a respectful environment when we:

- Speak up! If you see harassment or offensive behavior, say something.
- Think about our actions. Avoid saying or doing things that may offend others.
- Always treat one another with dignity and respect.

Q

Mila is on my team. She and I met with our supervisor, Theo, to raise a potential issue with a product we're developing. After Mila suggested we should delay production in order to address the problem, Theo raised his voice in a way that made me uncomfortable. He was angry and belittled Mila's concerns. I've seen him get like this once or twice before, but usually he's a decent guy. Is this harassment?

A

Depending on the facts, this could be harassment, bullying, or just poor management. Regardless, Theo's actions are not okay. We safeguard trust and serve our mission best when we develop teams where everyone feels safe and supported. Check with Mila to see how she feels and speak up to help create a respectful work environment.

ADDITIONAL SAFEGUARDS

Global Workforce Inclusion Policy

We Foster a Respectful Environment

Continued

WHAT DOES HARASSMENT LOOK LIKE?

- **It can be what we say or write** to one another in person or via company or personal channels, including Teams, email, or social media. This includes slurs, jokes, or stereotypes based on but not limited to, race, ethnicity, sexual orientation, gender, disability, age, or medical condition, and the use of threatening, harsh, or abusive language.
- **It can be about what we do**, such as unwelcome touching, making sexual advances, or blocking someone's path.
- **It can be about what we display**, such as what others may consider pornographic or sexually suggestive photos or materials or potentially offensive slogans, posters, or bumper stickers.

When it comes to harassment, the question isn't what we mean or intend by our words or actions, but how others might perceive or react to them.

We Promote Inclusion, Diversity, and Equal Opportunity

We make better and faster decisions and are at our creative best when we are inclusive, and draw on diverse talents and perspectives.



Why Our Actions Matter

Being accountable to each other means valuing our people for the variety of talents, ideas, backgrounds, and perspectives they bring. Our unique talent sets help us play to win more creatively and innovate more effectively.

How We Safeguard Trust

We promote inclusion and diversity when we:

- Build our teams with diversity in mind.
- Are transparent and share information with the entire team.
- Seek out different points of view to create innovative solutions.
- Listen to the ideas of others with courtesy and respect.
- Speak out if we feel our views or those of others are not being heard, or are being disrespected.

ADDITIONAL SAFEGUARDS

Global Workforce Inclusion Policies

We Keep Our Workplaces Safe, Secure, and Healthy

We are committed to keeping ourselves and each other safe, secure, and healthy. We take action to keep our visitors and communities safe from harm.

Why Our Actions Matter

We are at our best in a safe and comfortable environment. When we're confident, we can focus on our mission and produce our best ideas.

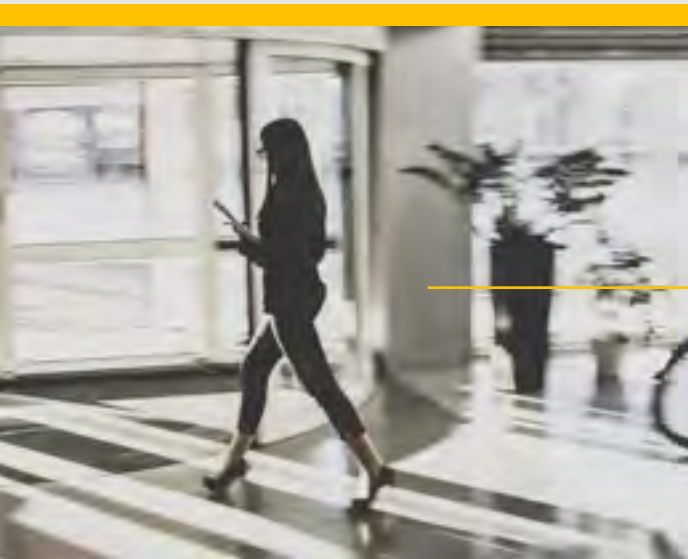
How We Safeguard Trust

We keep our workplaces safe, secure, and healthy when we:

- Report unhealthy conditions, such as workplace hazards, broken or missing equipment, or the presence of weapons, which are not allowed on company property.
- Do not make audio, photo, or video recordings of others at work without their notice and consent.
- Refrain from reporting to work under the influence of alcohol, drugs, or any other substance that could impair our ability to do our job or jeopardize the safety of others.
- Are prepared for a crisis event and call law enforcement in the case of danger.
- Know what to do in case of injury or other workplace emergency.
- Report any threats of violence we experience or witness (including outside of work and on social media).

ADDITIONAL SAFEGUARDS

Workplace Office Conduct, Rules, & Regulations | Inappropriate Possessions in the Workplace | Substance-Free Environment Policy





Safeguarding Assets and Sensitive Information

SAFEGUARDING
ASSETS AND
SENSITIVE
INFORMATION

We Protect Personal Data

To drive Cyber Safety forward, we keep Personal Data protected. At NortonLifeLock, any information about customers, employees, or partners that relates to an identifiable person is Personal Data. We handle Personal Data with awareness and care.

Why Our Actions Matter

Our customers and employees deserve to know how we use Personal Data. We want all of our stakeholders to feel protected and confident when we collect, store, and use their Personal Data. Handling Personal Data correctly wins customer trust, but it's also the right thing to do.

How We Safeguard Trust

We lock down Personal Data when we:

- Collect and use Personal Data only to meet business or legal needs, and only collect the minimum information needed.
- Take steps to properly secure, update, and dispose of Personal Data.
- Share Personal Data inside or outside of our company only for the purpose it was collected, and only in line with our internal and external privacy policies and statements.
- Speak up about misuses of Personal Data, even accidental ones, by contacting the **Privacy Team**.
- Follow all privacy and data protection laws that apply to us.
- Transfer Personal Data outside the European Economic Area in line with our **Binding Corporate Rules**.

Q I work in customer support. I gather and store information that could identify individual customers. A colleague who works in research asked if I could share data about customers to contact them about joining a focus group. Can I share this information with him?

A No. Customers have the right to understand how the data we collect about them is being used. Unless customers agree to having their data used for such a purpose, we should not do it. We must ensure we uphold our **Privacy Policy** and the law.

ADDITIONAL SAFEGUARDS

Global Privacy Policy | Binding Corporate Rules

We Guard Our Valuable Information

NortonLifeLock's intellectual property and confidential information are at the heart of what we offer customers. As a team, we must protect these from misuse.



Why Our Actions Matter

Our depth of leadership and fresh perspective give us an edge in developing new products and services. We use everything we've learned over the years to attract new customers. Guarding what we know and how we use that knowledge is key to our success.

How We Safeguard Trust

We guard our valuable information when we:

- Share sensitive data only with employees and approved vendors who need access for specific work needs.
- Secure documents, data, and devices physically and use appropriate document labels.
- Encrypt and password-protect our documents, data, and devices.
- Are aware of our surroundings when we work with or discuss confidential data.
- Ensure that we are not making Highly Confidential, Confidential, or Internal documents visible via an unsecured Wi-Fi network.
- Allow only those who are authorized to access our facilities.
- Report possible data breaches so that they may be addressed quickly.
- Use only NortonLifeLock-approved messaging systems and NortonLifeLock domain email addresses to conduct business.

ADDITIONAL SAFEGUARDS

Information Security Policy and Standards | Information Classification and Handling Standard

We Guard Our Valuable Information

Continued

HOW DO WE CLASSIFY DATA?

At NortonLifeLock, we classify data in one of the following ways.

Classification	Sensitivity	
Highly Confidential	Very High	● ● ● ●
Confidential	Moderate to High	● ● ● ●
Internal	Low to Moderate	● ●
Public	Low	●

We own our responsibility to protect all data, but some types of information are more sensitive than others. Unauthorized disclosure of Highly Confidential or Confidential information could have direct or indirect negative consequences for our company and our customers. Getting data right is an important way that we advocate for our customers.

Q I'm working with a vendor on our online subscription platform. I need to share specific information about our pricing with this third party. My company emails keep getting filtered to the vendor's spam folder. May I use my personal email account to share the necessary files?

A No. We need to use approved, secure methods for sharing such information. A personal email account does not meet our security standards and is not acceptable. Because sensitive information is in play, you should first confirm that a nondisclosure agreement is in place with this particular vendor. It's also our responsibility to make sure that all our vendors safeguard information carefully.

We Guard Our Valuable Information

Continued

WHAT IS *HIGHLY CONFIDENTIAL* OR *CONFIDENTIAL*?

Highly Confidential and **Confidential** are the two most restrictive classifications within our company. Data in these categories includes anything that the public doesn't or shouldn't know, such as:

- Trade secrets and other intellectual property, such as source code and technical information.
- Personal Data about our employees or customers.
- Financial information, such as pricing and sales records.
- New product and marketing plans.
- Third-party information subject to a nondisclosure agreement.
- Customer and business partner lists.
- Research ideas and information.
- Information about acquisitions and spinoffs.

Our Internal data is primarily internal or proprietary information not meant for public knowledge or disclosure. Our organizational charts, policies, and standards are Internal data.

See additional examples in our [Information Classification and Handling Standard](#).

We Respect the Intellectual Property of Others

We respect and safeguard the intellectual property and commercial rights of others.

Why Our Actions Matter

We are aware of the business value of our own ideas. We know the effort we put into creating and guarding these assets. We must respect others' intellectual property as we do our own. Failing to do so is wrong and may create financial and legal liability for NortonLifeLock.

How We Safeguard Trust

We respect and protect the intellectual property of others when we:

- Never infringe on the copyrights, patents, trademarks, or other intangible property belonging to another person or company.
- Do not use competitive or confidential information learned from other jobs while working at NortonLifeLock.
- Use all third-party assets, including software, music, videos, and text-based content, according to their specific license terms.
- Use software only for which we have a license for business use, even on employee-owned personal devices.



We Protect Our Assets

We take care of our assets because we know they help us promote Cyber Safety for our customers and create value for our shareholders.

Why Our Actions Matter

Our assets are the product of our game-changing expertise and our hard work. They represent our future. Our path to sustainable growth requires that we protect and use them wisely. We are all responsible for making sure we protect our assets from loss, damage, waste, and improper use.

TYPES OF ASSETS

- **Physical assets** include buildings, supplies, furnishings, and company-issued laptops and phones.
- **Information assets** include all data contained in our files and on our servers.
- **Intangible assets** include our reputation, ideas, inventions, intellectual property, designs, copyrights, trademarks, patents, and trade secrets. These assets help us drive innovation.
- **Financial assets** include money and anything that can be converted to money, such as stocks, bonds, loans, and deposits.

ADDITIONAL SAFEGUARDS

Travel and Expense Policy | Information Security Policy and Standards | Copyright Usage Policy | Intellectual Property Policy | Trademark Usage Policy



We Protect Our Assets

Continued

How We Safeguard Trust

We protect NortonLifeLock's assets when we:

- Safeguard them from damage, abuse, waste, loss, or theft.
- Employ good judgment in using information and communications systems.
- Handle company funds honestly, responsibly, and in accordance with NortonLifeLock policies, including all **finance policies** and the **Travel and Expense Policy**.
- Report any abuse or misuse of company assets.
- Report theft or loss of assets to **Global Security**.
- Work with respect and care when using company-owned equipment at home or in any remote location.
- Return NortonLifeLock equipment from remote work locations in good condition.
- Limit use of company-owned property for personal use.
- Never allow unauthorized individuals—including friends and family—to use our NortonLifeLock assets.

We Protect Our Reputation

At NortonLifeLock, we speak with one voice. This is true whether we're communicating with the media, financial analysts, investors, or the general public.



Why Our Actions Matter

Our customers, investors, and communities deserve the most accurate and clear information we can offer. We safeguard trust when we present our company in a positive light while always being truthful. We have designated specially trained colleagues to speak on behalf of NortonLifeLock. When we direct media inquiries to those best prepared to deal with them, we prevent misinformation or errors from being released to the public.

How We Safeguard Trust

We protect our reputation when we:

- Reply to external inquiries for information about our company by saying we are not authorized to speak on behalf of the company. Refer such inquiries to **Public Relations**, **Investor Relations**, or **Government Affairs**.
- Refrain from divulging Highly Confidential, Confidential, or Internal information about NortonLifeLock, our customers, or our business partners and vendors.
- Use inclusive language and do not say anything that is discriminatory or that would constitute a threat, bullying, or harassment.
- Be careful not to create any impression that we are speaking on behalf of the company in any personal communications such as blogs, user forums, chat rooms, social media posts, or bulletin boards.

ADDITIONAL SAFEGUARDS

Social Media Policy | Insider Trading Policy



Empowering Marketplace Trust

EMPOWERING
MARKETPLACE
TRUST

We Conduct Business Fairly and Honestly

We play to win but we never compromise our integrity. We succeed on the strength of the ideas and technology that bring value to customers. We're scrappy, we play fair, and we think on our feet.

Why Our Actions Matter

We welcome strong competition because it keeps us on top of our game. Customers searching for Cyber Safety come to NortonLifeLock—and stay with us—because they trust us. Innovating for their success is what ensures our own success—it protects our reputation and competitive advantage.

How We Safeguard Trust

We play fair and honest when we:

- Never discuss pricing, bidding processes, or dividing markets with competitors.
- Avoid making false claims or negative comments about competitors' products.
- Ensure our own product claims are accurate and current.
- Never use illegal or questionable actions to obtain competitive information.
- Avoid using our market strength in any way that might unfairly harm competition.
- Always behave professionally during negotiations, treating everyone with respect.

ADDITIONAL SAFEGUARDS

Global Supplier Code of Conduct | Partner Code of Business Conduct
Global Procurement Policy | Global Antitrust and Competition Policy

We Conduct Business Fairly and Honestly

Continued

Q

I was at a conference with several employees from competitors. During a side discussion, someone started talking about his company's pricing. I didn't want to be rude, but I knew we weren't supposed to discuss that topic. I interrupted him and told him to change the subject. Did I do the right thing?

A

Yes. *Discussing pricing, or other competitive information, with competitors is against antitrust laws. It's important to take an active role in preventing this sort of behavior. Sitting and listening without saying anything would not have been enough. In addition to interrupting the competitor, you should leave the conversation, document the incident, and let Ethics & Compliance know.*

We Prevent Bribery and Corruption

We do not bribe. We are open, honest, and direct. At NortonLifeLock, we win and retain business due to the strength of what we offer.

Why Our Actions Matter

Doing business the right way leads to better innovation and more powerful products. When we fight corruption, our business is stronger, more resilient to risk, and more sustainable. Conversely, corruption harms communities, puts our company at risk, and can result in substantial fines and prison time.

How We Safeguard Trust

We prevent bribery and other forms of corruption by:

- Never offering or accepting anything of value in exchange for a business advantage.
- Keeping accurate and complete financial records.
- Complying with corruption laws around the world, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act.
- Never using a third party to make improper payments.
- Following NortonLifeLock policies related to giving and receiving gifts, hospitality, and entertainment. (See [Gifts and Entertainment](#).)
- Doing business only with partners and vendors who commit to operating with integrity at all times.

ADDITIONAL SAFEGUARDS

Global Anti-Bribery and Corruption Policy



We Prevent Bribery and Corruption

Continued

IMPROPER INCENTIVES

- A **bribe** is anything of value offered to gain an improper business advantage. The amount of the bribe does not matter. A bribe is wrong even if it is not actually paid.
- A **kickback** is a form of bribe usually paid out of margin on a transaction and offered in return for favorable treatment.
- **Facilitation, or “grease” payments** are low-value payments made to advance routine government actions. These actions include visa processing, clearing customs, or securing police and fire protection, for example.

We Give and Receive Gifts and Entertainment with Integrity

We always look for ways to build and strengthen business relationships. However, we are first and foremost an advocate for our customers and will never offer or accept gifts meant to influence business decisions.



Why Our Actions Matter

Strong personal and professional relationships are key to fulfilling our mission. Exchanging modest gifts or hospitality can build goodwill and strengthen those relationships. We must ensure, however, that such courtesies don't affect our ability to make fair decisions. When we are careful when giving and receiving gifts, we make the decisions that are best for our customers and our reputation.

How We Safeguard Trust

We act with integrity by making sure any gifts or entertainment we give or receive:

- Are customary in nature as a business gift.
- Are not cash or cash equivalents (i.e., no Visa gift cards).
- Are under the value limits set by NortonLifeLock policies.
- Are infrequent.
- Don't have the appearance of or attempt to influence decision-making.
- Don't create a sense of needing to return a favor.
- Are permitted by law.
- Don't violate the business partner's or vendor's gift policy.

GOVERNMENT EMPLOYEES

Special rules apply to the giving of courtesies to government officials. What might be fine for a commercial business partner might pose a problem for a government official. It isn't always obvious who a government employee is, especially in countries with many state- or government-owned enterprises. Given the risks to our business if we do not follow the rules, it is important to seek guidance ahead of time from Ethics & Compliance for any questions around gifts, hospitality, or entertainment for potential government officials.

We Give and Receive Gifts and Entertainment with Integrity

Continued

The 20-40-250 Rule

First, ask yourself who you're working with, which determines the appropriate threshold for gifts, hospitality, and entertainment ("GHE").



\$20

US PUBLIC SECTOR

For the US public sector, the GHE threshold is \$20 per person.



\$40

INTERNATIONAL PUBLIC SECTOR

For the international public sector, the GHE threshold is \$40 per person.



\$250

COMMERCIAL SECTOR

And for the commercial sector, the GHE threshold is \$250 per person.

Q

I have a contact with a business partner who provides support for the phones in our office. We've worked together for a couple years now. The last time we met in person to discuss a new contract, he noticed the screen on my personal cell phone was cracked. A week later, I got a package with a brand new phone in it at my office. It had a note from him thanking me for the continued business. Can I keep the phone?

A

No. Even if you think such a gift won't affect your ability to be fair in future business decisions, others may not see it that way. This gift is above the limit of what we allow in our **Global Anti-Bribery and Corruption Policy**, which sets the thresholds and provides additional guidance.

ADDITIONAL SAFEGUARDS

Global Anti-Bribery and Corruption Policy

We Keep Free of Conflicts of Interest

We put NortonLifeLock's goals and customer interests before personal gain. Doing so safeguards trust by keeping us laser focused on protecting and enabling our consumers' digital lives.



Why Our Actions Matter

We all have lives outside of NortonLifeLock. But blazing the Cyber Safety trail requires us to make the decisions that best serve our customers and company. When we keep free of conflicts of interest, we can strive and innovate without divided loyalty. Even the appearance of a conflict of interest can leave others thinking we aren't acting cohesively as a team.

How We Safeguard Trust

We avoid conflicts of interest when we:

- Are alert for situations where our personal activities or relationships could get in the way of our objectivity.
- Speak up to a people leader or People & Culture or use the [EthicsLine](#) when we believe there may be a conflict between our personal interest and the interests of the company.
- Disclose—in advance—all potential conflicts of interest via [EthicsLine](#) for review.

WHAT IS A CONFLICT OF INTEREST?

A conflict of interest exists when our personal interests, activities, or investments clash with our responsibilities for NortonLifeLock. Many potential conflicts can be avoided. Use the [EthicsLine](#) when in doubt about how to handle a specific situation.

ADDITIONAL SAFEGUARDS

Employment of Relatives Policy

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



Employing Relatives and Friends. We avoid employing relatives and friends: (1) in the same department, unless they are reporting to different first-line people leaders; (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.”



Relationships with Colleagues. Romantic relationships between colleagues may require changes to be made to work arrangements, depending on the employees’ roles within the company. Disclose such relationships promptly to Ethics & Compliance.



Financial Interests in Other Businesses. We ensure that personal and family investments do not get in the way of our decisions on behalf of NortonLifeLock. We avoid personal or family financial interests in a NortonLifeLock customer, channel partner, vendor, other business partner, or competitor. These financial interests include investment, ownership, or creditor interests, which could improperly influence our judgment, have the potential to cause the appearance of divided loyalty, or might result in personal benefit because of our roles at NortonLifeLock.



Personal Benefit or Gain from Business. We do not take personal advantage of business opportunities that we discover in the course of our work. They belong to the company. Additionally, receiving personal benefits from others because of our status as an employee may lead to divided loyalties. We do not accept any personal benefit other than our compensation from NortonLifeLock in connection with any transaction involving NortonLifeLock, or our status as employees. This includes situations where we may do business directly or indirectly with family members or friends.



Outside Employment. We each give our best effort every day to make sure that outside jobs or other activities, including outside directorships, don’t hinder our work for NortonLifeLock. We do not let outside employment and other activities influence our judgment, decisions, or actions with respect to our roles at the company, interfere with our work at NortonLifeLock, or cause us to misuse company information or assets. This holds true regardless of whether we may be called an “employee,” “consultant,” “contractor,” “owner,” “investor,” or “volunteer.” Working for or serving on the board of a competitor is never allowed.

We Prevent Insider Trading

At NortonLifeLock, we have access to sensitive information. We never use or share private information about our company or any other for the purpose of buying or selling securities.

Why Our Actions Matter

In the course of our jobs, we may have access to information that is not known to the public. Whether such information belongs to us, or to another entity, we're careful to protect it. We value our reputation as a company that can be relied on to guard the information entrusted to us. This applies to material, nonpublic information about NortonLifeLock, our customers, and business partners.

Insider trading occurs when someone uses or shares "inside information" for personal gain or to avoid a loss. It is a serious crime, punishable by large fines and imprisonment.

How We Safeguard Trust

We help prevent insider trading when we:

- Do not buy or sell shares in NortonLifeLock or any other publicly traded company, when we have inside information about NortonLifeLock or the company in question.
- Avoid buying or selling shares until the key inside information is published and investors have had a chance to gauge it.
- Avoid sharing inside information with anyone outside NortonLifeLock, including relatives or friends.
- Share inside information with fellow employees only on a need-to-know basis.
- Take care to protect inside information from accidental disclosure.
- Do not tip, the act of directly or indirectly passing along inside information.

ADDITIONAL SAFEGUARDS

Insider Trading Policy



We Prevent Insider Trading

Continued

WHAT IS INSIDE INFORMATION?

Inside information is anything known to us, but not yet released to the public, which might inform an investor's decision to buy or sell shares. Examples include:

- New business relationships
- New product launches
- Company financial results
- The results of significant litigation
- Prospective mergers and acquisitions

We Keep Accurate Records and Accounts

We keep complete and accurate records to help us make good business decisions. They allow us to provide honest and up-to-date information to investors and government agencies.

Why Our Actions Matter

Complete and accurate financial statements and business records help us to make the best decisions and plans. We win together when we maintain proper records to run NortonLifeLock successfully and lawfully. We are a public company and are required to disclose full information about our business when asked.

How We Safeguard Trust

We maintain the integrity of our books and records when we:

- Comply with accepted accounting principles, internal controls, and laws.
- Maintain honest, careful books, expense reports, and receipts of our financial transactions.
- Record all assets, liabilities, revenues, expenses, and business transactions accurately.
- Follow all recordkeeping procedures and guidelines.
- Never set up or maintain secret cash funds or other assets or liabilities.
- Promptly submit accurate records to internal and external auditors.
- Seek help from the [Litigation legal team](#) when unsure about how to handle records.

ADDITIONAL SAFEGUARDS

Global Records Management Policy | Records Retention Schedule



We Deal Fairly and Honestly

We speak with honesty when showing the value NortonLifeLock brings to our customers. We never make false statements about what we offer or about our competitors in marketing or sales activities. We also partner with businesses that share our high ethical standards and ensure the best value for NortonLifeLock.



Why Our Actions Matter

We play to win by being open and real about what we do. Failing to do so undercuts our ambition to become a trusted partner to protect and enable our consumers' digital lives. It also exposes us to fines, penalties, and lawsuits. By working with ethical business partners and vendors who share our commitment to transparency, we can advance and protect our business.

How We Safeguard Trust

We deal fairly and honestly when we:

- Have all marketing language reviewed by the **Marketing Legal** team, including language provided by third parties.
- Do not misrepresent what our products and services do.
- Do not make inaccurate or disparaging claims about competitors.
- Do not infringe on copyrights, logos, or other intellectual property.
- Ensure our advertisements and contracts comply with all laws and regulations.
- Treat all business partners and vendors fairly and with integrity.
- Choose business partners who share our values and meet our needs and who agree to market and sell our products with integrity.
- Avoid **inappropriate gifts**, which may compromise the selection of the best partners for NortonLifeLock.
- Seek to understand issues when they arise and work together to find solutions that work for everyone.
- Ensure all business partners and vendors are committed to ethical business practices and compliance with the law.

ADDITIONAL SAFEGUARDS

Unfair, Deceptive, or Abusive Acts or Practices Policy | Global Signature Authority Policy
Global Financial Approval Authority Policy | Global Procurement Policy
Partner Code of Business Conduct | Social Media Policy

We Deal Fairly and Honestly

Continued

Q

I'm a customer support representative. On a call, a customer is asking if I can guarantee that his personal computer using one of our Cyber Safety solutions is protected from hackers. Can I tell him that it is?

A

No. While we're an industry leader in Cyber Safety, no solution is without some vulnerability. We should not attempt to overstate or misrepresent what our products do. We speak with honesty and transparency with customers about our own products and those of our competitors. Refer to our **Unfair, Deceptive, or Abusive Acts or Practices Policy** for more.

Q

I work with our advertising group. I just had a great slogan for a new product. Can I start using the language in email blasts I write?

A

It depends. Legal needs to review all external marketing language in advance to ensure that the slogan accurately describes the product. We take this measure to be fair to our customers and to comply with the Federal Trade Commission (FTC) and similar regulatory bodies. NortonLifeLock benefits when consumers are protected and markets are fair, because we believe that we can distinguish our products and services based on their merits.

CONTRACTING PRACTICES

When we follow best practices to contract third parties, we protect NortonLifeLock's interests. We minimize risk to our customers, employees, and shareholders. Only authorized employees can enter into contracts that meet specific standards outlined in our policies. Side agreements of any kind are prohibited.

We Do Business Globally the Right Way

We follow all global rules and laws that apply to our business.

Why Our Actions Matter

As a global business, our decisions and actions must follow the regulations that apply to us around the world. When we follow these laws, we uphold fair markets and support a safe and fair world. We also avoid penalties and fines.

How We Safeguard Trust

We do business globally the right way when we:

- Follow import and export laws.
- Don't agree to any contractual clauses that obligate a party to boycott any country, which are illegal in the United States.
- Don't bribe or pay facilitation payments. (See [We Prevent Bribery and Corruption.](#))
- Compete fairly. (See [We Conduct Business Fairly and Honestly.](#))

ADDITIONAL SAFEGUARDS

Global Trade Compliance Policy | Global Procurement Policy

Global Antitrust and Competition Policy | Global Anti-Bribery and Corruption Policy



Safeguarding Trust in Our Communities

SAFEGUARDING
TRUST IN OUR
COMMUNITIES

We Are Committed to Environmental Responsibility

We strive to lead in environmental responsibility. We apply the same tactics to lowering our environmental impact that we use to advance Cyber Safety.

Why Our Actions Matter

We know that our business has an impact on the environment. We seek to minimize this impact in various ways ranging from reducing water usage, carbon emissions, and waste to developing environmental initiatives. We safeguard trust when we take care of the environment where we operate.

How We Safeguard Trust

We commit to environmental responsibility when we:

- Consider and propose ways to reduce waste and recycle goods.
- Participate in company initiatives related to environmental action.
- Take small, practical steps every day to cut emissions and reduce our use of water, fuel, and electricity.
- Follow all applicable environmental laws and company policies.



ADDITIONAL SAFEGUARDS

Global Supplier Code of Conduct

We Contribute to Our Communities

We are committed to supporting the communities where we live and work. This commitment extends to the countries where we operate.

Why Our Actions Matter

At NortonLifeLock we invest strategically to contribute to the communities where we live and work. We amplify our impact and accelerate progress by partnering with high-impact nonprofit organizations and leveraging employee expertise. Our philanthropic focus areas are aligned to our business priorities and include STEM (Science, Technology, Engineering, Mathematics) education, emphasizing computer science and cyber security skills, diversity, online safety, and environmental responsibility.

How We Safeguard Trust

We contribute to our communities when we:

- Volunteer and participate in charitable activities.
- Obtain approval before donating company funds or making contributions in NortonLifeLock's name.
- Ensure that outside activities do not interfere with our job performance or create a conflict of interest.
- Never pressure others to contribute to charitable organizations or other community activities.

ADDITIONAL SAFEGUARDS

Charitable Donations Policy | Solicitation of Goods and Services Policy



We Protect Human Rights and Source Responsibly

NortonLifeLock respects human, cultural, and legal rights. We are dedicated to fair treatment. We expect our business partners to share this commitment.

Why Our Actions Matter

NortonLifeLock supports the dignity and equality of all human beings. We believe that human trafficking, slavery, child labor, and unsafe and unfair work practices have no place in our global society. We make sure we safeguard human rights every step of the way.

How We Safeguard Trust

We protect human rights and source responsibly when we:

- Provide proper working conditions, hours, and compensation to all NortonLifeLock employees.
- Work only with business partners who are committed to fair labor and sustainable sourcing practices.
- Never use child or prison labor.
- Uphold our commitments as a signatory of the UN Global Compact **Ten Principles** and **Sustainable Development Goals**.
- Alert People & Culture or use the EthicsLine if we suspect human rights violations.



ADDITIONAL SAFEGUARDS

Global Supplier Code of Conduct | Human Rights Policy

We Carefully Participate in the Political Process

Active participation in the political process can have a positive impact on our lives. As a company, we engage constructively with governments in the regions where we operate.

Why Our Actions Matter

We feel that an open, robust political process makes a fairer, more efficient, and more productive society. While we support every employee's right to an active political life, it is important to keep our work separate. We don't want to create the impression that NortonLifeLock supports our personal causes.

How We Safeguard Trust

We carefully participate in the political process when we:

- Make it clear that our political views and actions are our own and not those of the company.
- Make political contributions on behalf of NortonLifeLock only with advance approval.
- Follow the rules on public disclosure and all reporting requirements related to lobbying on behalf of NortonLifeLock.
- Seek help to comply with all relevant laws regarding corporate political contributions wherever we do business.
- Approach public policy in a bipartisan manner and work to educate all those with an interest in issues that impact our company.

ADDITIONAL SAFEGUARDS

Global Political Contributions Policy

We Carefully Participate in the Political Process

Continued

PARTICIPATING IN THE DEVELOPMENT OF PUBLIC POLICY

We engage in public policy debates worldwide. Our aim is to promote policy that supports our long-term mission to protect consumers, innovate, and ensure the unimpeded flow of the world's information. We promote ideas that can deal with the complexities of consumer cyber safety and to ensure that we can compete on a level playing field across the global marketplace.

We follow all laws related to political contributions and make such contributions only with approval from Government Affairs and Ethics & Compliance. We further uphold our commitment to open communication by disclosing all our contributions on our public website.

Conclusion

At NortonLifeLock, we are known for our technical know-how and spirited drive to advance the cause of Cyber Safety. But it's our commitment to safeguarding trust and doing business the right way that sets us apart. When we live our Code—when we pair a scrappy, can-do attitude with a commitment to transparency, accountability, and putting our customers first—we set ourselves up for

long-term success. When we ground our decisions in our values and follow the principles of our Code, we safeguard trust for all the people who depend on us day in and day out.

Each of us has the power to do what is right and enact change, both in the world and within our company. Go do it.



Resources

NORTONLIFELOCK POLICY REPOSITORY ➡

Ethics & Compliance

To report a concern, use our EthicsLine:

- 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, Anonymous Option

People & Culture

- Submit a ticket via our [NLOK Employees HR & Payroll Portal](#).
- Contact your People & Culture Manager or Business Partner directly.
- Reach out to any member of the People & Culture team.

NortonLifeLock Legal ➡

Public Relations ➡

Investor Relations ➡

Government Affairs ➡

Global Cyber Security ➡

Global Security Operations Center ➡



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