



NortonLifeLock Modern Slavery Act FY21 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.

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

In FY21, no human rights issues were reported through EthicsLine, our anonymous third-party managed compliance hotline. Our two main suppliers, which manufacture and distribute over 97% of our physical products globally by spend, were considered "low risk" for human trafficking based on the Company's own review. In FY22, we also added questions to our supplier audits around human rights. Additionally, we held a virtual corporate responsibility audit of these two primary suppliers and found they had no human rights breaches in the past three years. NortonLifeLock employees received human rights training in early FY22 as part of our annual mandatory Code of Conduct training. Human rights training modules have been added to our employee learning and development system.

All 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 21. September 2021



Sue Barsamian (Sep 22, 2021 16:58 PDT)

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