



Human Rights Policy

Global



Guiding Principles

NortonLifeLock supports and respects internationally recognized human rights and labour standards as proclaimed in the [Universal Declaration of Human Rights](#), [the International Labour Organization's Core Conventions](#), [the International Covenants on Civil and Political Rights and on Economic, Social, Cultural Rights](#) and [the United Nations Guiding Principles on Business and Human Rights](#). We are a signatory to the [United Nations Global Compact](#) (UNGC).

Our commitment to respect human rights is embedded in the company's [Code of Conduct](#). NortonLifeLock respects the dignity of others and expects our employees and vendors to comply with the policies outlined in the company's Code of Conduct. NortonLifeLock commits to proactively avoid human rights abuses and complicity in the abuses of others through due diligence procedures.

Policy

Priority Human Rights Areas

Inclusion & Diversity: NortonLifeLock is committed to building an inclusive, diverse workforce. We celebrate diversity as a driver of innovation and know that diverse points of view help us make products and services that meet the needs of the broad spectrum of people we serve. This starts with ensuring a culture where people of every race, ethnicity, age, sexual orientation, disability, background, and experience are respected and encouraged to thrive. We believe that a work environment where people can be their authentic selves can help amazing things come to life. We care about transparency and share our [CR Report Performance Tables](#), challenges, and action plans for continual improvement with our employees and stakeholders.

Equality Opportunity: At NortonLifeLock we believe in equal pay for equal work, in FY20, global representation increased to 31% female, and in the U.S underrepresented minorities represented 10.8% of our workforce. As a standalone consumer business, we are in the process of establishing our baseline representation and look forward to sharing our first full year of diversity, equity and inclusion data.

Harassment Free Environment: We believe everyone has the right to be treated with dignity and respect. We strive to create supportive, harassment-free work environments. See [Global Code of Conduct](#) for more information.

Privacy: Privacy is a fundamental human right and protecting personal data—whether our own, our customers', or our partners' is part of our commitment to corporate responsibility. NortonLifeLock is committed to complying with applicable legal requirements, and continuously enhancing our privacy and security practices across the globe. We are dedicated to transparency every step of the way. We provide a [Global Privacy Statement](#) to explain the company's personal data processing practices.

Responsible Sourcing: NortonLifeLock supports the dignity and equality of all human beings. We believe that human trafficking, slavery, child labour, 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. We expect our suppliers to adhere to the standards in [Global Supplier Code of Conduct](#).

Exceptions & Delegations

Where local law and international law is in conflict, we comply with local law.



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Compliance

NortonLifeLocks' Board of Directors, Nominating and Governance Committee, has responsibility for oversight of the company's corporate responsibility effort which includes this Human Rights Policy. The Ethics Team has day to day responsibility for the implementation of this policy.

NortonLifeLock provides training to all employees through an annual Code of Conduct training program.

Reporting concerns

- Any human rights concerns should be reported via [EthicsLine](#), NortonLifeLocks' ethics incident management tool. EthicsLine provides online or telephone access to employees and external stakeholders around the globe. The online, on-demand application is available 24 hours a day in 170 languages. Reporters may choose to identify themselves or to remain anonymous, unless restricted by law.
- Employees should report any Code of Conduct or human rights violations to their manager, anyone in their management reporting chain, a Human Resources representative, the Office of Ethics and Compliance (at ethicsandcompliance@symantec.com), or through Symantec's EthicsLine. 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

Universal Declaration of Human Rights <http://www.un.org/en/universal-declaration-human-rights/index.html>

The International Labour Organization's Core Conventions <http://www.ilo.org/ilolex/english/convdisp1.htm>

The United Nations Guiding Principles on Business and Human Rights

http://www.unglobalcompact.org/Issues/human_rights/The_UN_SRSR_and_the_UN_Global_Compact.html

United Nations Global Compact (UNGC) <https://www.unglobalcompact.org/>

UNGC Lead Program <http://www.unglobalcompact.org/howtoparticiate/lead/index.html>

Code of Conduct <https://www.nortonlifelock.com/us/en/legal/code-conduct/>

Approval Matrix

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