



Human Rights Policy

Symantec supports and respects internationally recognized human rights and labor standards as proclaimed in the [Universal Declaration of Human Rights](#), the [International Labor 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 \(UNGC\)](#) and its [Lead Program](#).

Our commitment to respect human rights is embedded in the company's [Code of Conduct](#). Symantec respects the dignity of others and expects our employees and vendors to comply with the policies outlined in the company's Code of Conduct. Symantec commits to proactively avoid human rights abuses and complicity in the abuses of others through due diligence procedures. We expect our vendors and suppliers to adhere to the standards in Symantec's [Global Supply Chain Manufacturing and Fulfillment Code of Conduct](#) and [Global Supply Chain Code of Conduct](#).

Governance

Symantec's 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 Corporate Responsibility team has day to day responsibility for the implementation of this policy.

Any human rights concerns should be reported via [EthicsLine](#), Symantec's 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.

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Priority Human Rights Areas

Following a human rights risks and opportunities assessment, privacy, free expression, rights of employees and gender equality were identified as priority human rights areas for Symantec.

- **Privacy:**

Symantec protects the world's people and information. Our core business and expertise is to secure information; therefore, we have an opportunity to help individuals secure their data from access by anyone.

We have a company-wide internal Global Privacy Policy and an Employee Privacy Policy. We have an external [Online Privacy Statement](#) concerning the data we collect on our websites and a Mobile Privacy Policy concerning data collected by our Norton mobile apps. We provide specific disclosure about data collected by our mobile apps. Our policies are based on foundational principles that ensure transparency when we collect personal information, respect individuals' choices, and in general ensure that we keep the data of customers and employees accurate and secure.

We implement our policy through ongoing communication, training, and department specific procedures. Symantec provides our customers with the necessary information so that they can comply with their own obligations as data controllers.

- **Free expression:**

There is risk that the products, technologies or consulting services that Symantec provides to enterprises or government customers could be used in ways that threaten the right to privacy. In particular, our products with location or conversation monitoring capabilities intended for monitoring purposes, may be misused for inappropriate purposes.

Yet, there is an opportunity for Symantec's products to enable greater freedom of expression as the security of information can encourage greater expression and exchange provided we offer products with a level of consciousness. Symantec also strives to implement product capabilities in a transparent manner.

- **Rights of employees:**

Symantec defines diversity as all of the differences that make each of us unique individuals. Our ability to attract, retain and fully engage diverse talent leads to

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enhanced innovation and creativity in our products and services. As such, we believe that our continuing commitment to inclusive hiring and promotion is a business imperative.

We identified the rights of employees as both an area of risk and opportunity for Symantec. There is a risk of unequal pay between male and female employees and other gender discrimination challenges in the IT sector and in its supply chain. In the supply chain, and to a less degree for Symantec's own employees, the right to form and join trade unions is at risk.

Symantec has shown leadership in our approach to diversity and non-discrimination. We have an opportunity to help women advance in the IT sector and we devote particular attention to the promotion of gender equality and the advancement of women in technology.

- **Gender equality:**

Women are under-represented in technical and leadership positions in the technology industry. At any given point in time over the past few years, women have comprised slightly more than a quarter of Symantec's global workforce, consistent with women's representation in the tech industry as a whole. To increase the number of women in leadership and technical positions at the company, Symantec has committed to a proactive, deliberative approach to create systemic change.

Symantec is a founding signatory of the [Women's Empowerment Principles \(WEP\)](#)—a partnership initiative of UN Women and the United Nations Global Compact—we commit to the pursuit of ongoing women's advocacy efforts, aligned with the seven WEP mandates.

Conclusion

Where local law and international law is in conflict, we comply with local law. However, we try to meet the underlying principles of the Universal Declaration of Human Rights where possible and remediate human rights issues.

We provide training to all employees through an annual Code of Conduct training and have implemented internal audit procedures to enforce this policy.

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