



Partner Code of Business Conduct

Gen Digital Inc. ("Gen") is a global company powering Digital Freedom through consumer brands including Norton, Avast, LifeLock, Avira, AVG, ReputationDefender, and CCleaner. We bring leading technology solutions in cybersecurity, privacy and identity protection to more than 500 million users so they can live their digital lives safely, privately, and confidently today and for generations to come. The very nature of our business – assuring the security and integrity of our customers' information – requires a global culture of ethical responsibility as the foundation for our success. We are committed to conducting business with the highest standards of integrity and in full compliance with applicable laws and regulations around the globe. We expect the same from any individual or entity we do business with and/or authorize to conduct business on our behalf.

This Gen Partner Code of Business Conduct ("Partner Code") applies to all business partners involved in the distribution, resale or commercialization of Gen products and services, whether a direct or indirect partner ("Partners"). Any violation of this Partner Code will constitute grounds for the immediate termination of any and all agreements between you and Gen.

To that end, our Partners agree to the following principles to govern your conduct:

1. **Code of Conduct:** Have and enforce written codes of conduct to establish expectations for appropriate behavior and to communicate these expectations to your respective employees, consultants and other agents involved in Gen matters. Have means of anonymous communication such as hotlines in your company to the extent permitted by law, and not to retaliate against whistleblowers in any way. Establish your own policies, training, and monitoring practices to ensure compliance with the provisions of this Partner Code and with applicable laws in general.
2. **Anti-Corruption:** Comply with anti-corruption laws everywhere you do business with Gen and/or on Gen's behalf, including but not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. You will not offer money or anything else of value to government officials or commercial entities in order to obtain or retain business. Any discounts, equipment loans, marketing funds, rebates or other financial benefits provided by Gen through an authorized program or approved incentive may not be used to disguise or facilitate any improper payment or gift giving. You will not offer or provide gifts, hospitality or entertainment to any Gen employee or family member of the Gen employee, or other Partner or customer, which may create an appearance of impropriety or otherwise violate Gen policies, including but not limited to Gen's Development Fund Policy guidelines.
3. **Competition and Antitrust Law:** Comply with applicable competition and antitrust laws and regulations governing fair business, fair trade, advertising and competition, using appropriate means to safeguard customer information everywhere you do business with Gen and/or on Gen's behalf. You will not discuss or enter into any agreement with any competitors, including other Partners, to directly or indirectly fix prices, margins, inventory levels, division of sales territory, products, customers or suppliers.
4. **Trade Compliance:** Comply with all applicable import and export laws and regulations of the United States of America, as well as with all applicable import and export laws of the other countries in which you do business, including economic sanctions and trade embargoes. (For more information, see [Gen's Export Policy](#).)
5. **Environmental Laws:** Conduct business in an environmentally responsible manner, in compliance with all applicable laws and regulations protecting the environment everywhere you do business on behalf of Gen.
6. **Privacy and Data Security:** Comply with all applicable laws and regulations governing the protection of privacy and data security. (For more information, see [Gen's Online Privacy Statement](#).)



7. **Confidentiality and Intellectual Property:** Not to disclose non-public information regarding business activities, structure, financial situation and performance, relating to Gen or any third party as provided by Gen, or disclose such information of a Gen competitor to Gen. Protect and responsibly use the intellectual assets and confidential information as disclosed to you by Gen, consistent with the authorization granted for such use by Gen. Comply with Gen's requirements and industry best practices relating to confidentiality, security, data privacy and intellectual property protection.
8. **Conflicts of Interest:** Avoid engaging in any business activity that could create an actual or perceived conflict between the Partner's interests and those of Gen. Note that Gen employees may not hold an economic interest in any entity that does business with Gen without prior disclosure via [EthicsLine](#).
9. **Sales Integrity:** Not to enter into any transaction that facilitates improper revenue recognition, expense treatment, or other accounting improprieties on the part of either the Partner or Gen. Such irregular conduct includes, but is not limited to, placing orders with Gen when there is no firm commitment from customer to purchase products or services, or handling inventory in any manner not consistent with ethical business practices. Violation of this section may result in liability to the Partner for which Gen will not be held responsible, including but not limited to, removal from channel programs, etc.
10. **Labor Standards:** Uphold the human rights of workers and treat them with dignity and respect as understood by the international community and proclaimed under the Universal Declaration of Human Rights and the International Labor Organization's core conventions. These rights include freely chosen employment, avoidance of child labor, implementing fair working hours, wages and benefits, anti-human trafficking efforts and guarantee of humane treatment, non-discrimination in employment and freedom of association.
11. **Lobbying Government Officials:** Refrain from lobbying government officials on behalf of Gen (unless specifically retained by Gen for lobbying services). Lobbying generally includes activities designed to influence laws, regulations and policies.
12. **Relations with Channel Partners and Customers:** Encourage all channel partners and customers to also adhere to these principles.
13. **Cooperation and Compliance with the Code:** Maintain documents and records and conduct routine audits to ensure compliance with the Partner Code. Cooperate timely and fully with any reasonable compliance audit by Gen or request for certification by Gen, including without limitation, providing Gen with documents related to Gen business and making your representatives available for interviews by Gen and/or Gen representatives. Have a corrective and preventative action process in place to address non-compliance with the Partner Code.
14. **Raising Concerns:** Inform Gen if any situation develops that creates a risk of causing or actually causes the Partner or its representatives to act in violation of this Partner Code. Promptly contact your Gen contact to work together in resolving the concern. Compliance concerns may also be directed to Gen's [EthicsLine](#) or by [e-mail](#). Gen's EthicsLine is available 24 hours a day, seven days a week, is confidential and toll free. Interpreters are available if needed.

For questions regarding this Partner Code, contact your designated Gen Representative or Gen's [Ethics & Compliance team](#).