

Gen™

Protecting and empowering people in the digital world

Fiscal Year 2024 Social Impact Report



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Letter from Vincent Pilette

Our lives are now online more than ever, and our personal information is everywhere. At the center of these rapid changes are all of us – the people who want to enjoy technology safely and confidently. It’s our mission to make that happen.

At Gen, everything we do is rooted in powering Digital Freedom and protecting digital possibilities for generations to come. We believe we must go beyond digital safety to achieve this, helping educate, build awareness and develop the skills people need to live freely in the digital world of tomorrow. And we’ll only reach that purpose by building trust with our customers, our employees, our communities, our suppliers and more.

At the heart of Gen is a mission-driven team, bringing together our passions and technology to support people and communities. A thoughtful, informed approach generates impact across our social impact priorities: Cyber Safety education and training; data privacy and protection; diversity, equity and inclusion; volunteering and giving; and the environment.

We’re reaching students, families, teachers and those most vulnerable with the Cyber Safety education and training they need.

At the start of 2024,¹ we set a goal to reach four million people through Cyber Safety awareness and training. Our thoughtful partnerships helped us far surpass our target impact; 5.3 million children, teens, teachers, parents and families are now more equipped to enjoy digital life. This year, more than 9,700 nonprofits protected themselves with our products, a retail value of \$2.9 million.

Our employees devote their time, skills, and capital across the world.

By listening and adapting, we’re curating experiences that motivate our employees to give back. Collaboration between our Diversity, Equity & Inclusion and Corporate Responsibility teams, and Communities@Gen, add to this. More than half of our employees now participate in volunteering or giving programs. This exceeds the industry benchmark by 30%,² as well as our goal to achieve 40% participation during 2024.

We’re committed to making technology and cybersecurity more inclusive and equitable.

We’re building the skills of women across Europe through our partners Czechitas and Women4Cyber. We’ve created the Gen Testing Academy where women in the Czech Republic receive the training and testing needed to pass industry certifications. In 2024, our education programs reached more than 4,000 women and more than 700,000 women through social media awareness campaigns.

We continue to do our part to minimize our impact on the planet.

In 2024, we decreased Scope 1 and 2 greenhouse gas emissions by 22%. Through our Sustainable Home Improvement Program (SHIP) more than 1,000 projects were completed around the globe in 2024, with 1,800 to date. Today, 98% of our products are delivered digitally and less than 0.5% of the materials used in our global physical products contain plastic.

And our hard work is being recognized by some of the world’s leading benchmarks for social impact.

In 2024, Gen was named one of Newsweek’s Most Responsible Companies, America’s Greatest Workplaces for Diversity and one of America’s Greatest Workplaces for Women. We were also listed on the Dow Jones Sustainability North America Index (DJSI).

At Gen, we have made it a priority to match our social impact efforts with our leadership position in empowering Digital Freedom for everyone. We have and will continue to invest in programs around the world with a special focus on deepening our partnerships in the communities we live and work, such as Czechia. Our team's passion and drive to build a Cyber Safe world is evident in all that we do. Together, we are making the world a better and safer place.

Vincent Pilette

CEO & President, Gen

¹ Throughout the report, references to 2024 or past/future years, refer to Gen’s fiscal year, unless otherwise noted.

² For example, fiscal year 2024 includes April 1, 2023 – March 31, 2024.

² Based on customer benchmark by Benevity.



Letter from Sue Barsamian

We are excited about the opportunities to drive real impact around the world, helping people take full advantage of the digital world, safely, privately and confidently. Our experienced, independent and diverse Board continues to identify the opportunities to take Gen’s business to the next level. At the center of this is never losing sight of our purpose and commitment to social impact, that we know contributes to our long-term sustainability as a company.

We therefore bring a focus on social impact into everything we do. The Board is actively engaged in overseeing and shaping our social impact strategy, while staying informed on emerging environmental, social and governance (ESG) topics. The Corporate Responsibility team uses our cross-functional ESG working group to put in place the policies and programs we need and to expand the possibilities and impact of our corporate responsibility strategy.

As we address and prepare for numerous regulatory shifts across the US and Europe such as the US SEC’s Cybersecurity Rules, the Corporate Sustainability Reporting Directive (CSRD), California’s climate bills, and more, working together at all levels across all functions is more important than ever.

As we scale up our use of AI, we remain committed to building and using AI tools with integrity, transparency and accountability. Our Board, alongside our Corporate Responsibility, engineering, product and legal teams are developing policies, conducting training and gaining guidance from national frameworks at the forefront of responsible AI.

This year, through a cross-functional effort, we plan to expand our priority issues assessment to reflect double materiality, looking at both the impact of ESG issues on our bottom line and on people, society and the environment.

With these foundations in place, we continue to build a value-generating, purpose-focused business, and transform our ability to power Digital Freedom for all.

Sue Barsamian

Board Member and Nominating and Governance Committee Chair, Gen



Beyond Digital Safety

Rooted in our heritage of protecting the first digital generations, our family of consumer brands is focused on powering Digital Freedom and possibilities for the future. We are going beyond Cyber Safety to help define what it means to live freely in the digital world of tomorrow.



5 billion people

Today, five billion people use the internet.

A world of possibilities

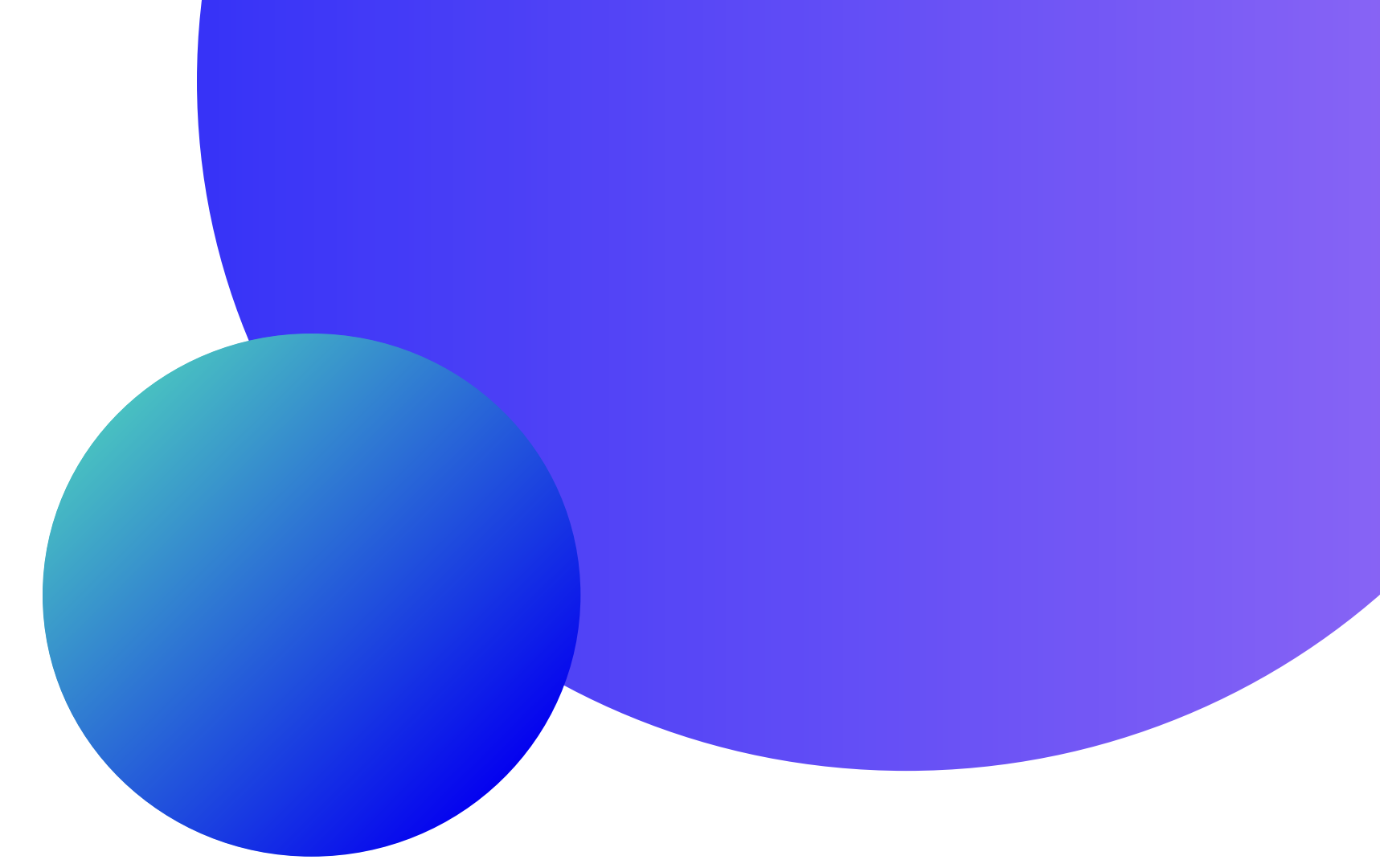
Digital life is life. People bank, shop, learn and connect from anywhere. They use voice assistance in homes and cars to navigate their lives. And send money to friends and stores with digital wallets. That's the freedom digital life allows today. Imagine what the future will bring.

And a mission to power Digital Freedom

It's our mission to help people take full advantage of the digital world. Safely, privately and confidently.

We're a family of trusted consumer brands built for the next generation of digital life. A company that brings award-winning products and services in cybersecurity, online privacy and identity protection to nearly 500 million users in more than 150 countries.

> For more information about Gen, visit [our website](#) and the [data tables](#) in this report.



Gen™



Powering Digital Freedom

Gen is committed to driving authentic, real and positive global impact. By unifying our team, passions and technology, we support both communities and people to make the world a better and safer place.



Gen's office in Mountain View, California (U.S.).

Social Impact @ Gen™



Kim Allman, Gen's Head of Corporate Responsibility and Public Policy (left) joins #TeamGen for Global Volunteer Day.

“We work to connect every piece of our corporate responsibility strategy to what Gen offers as a company. Our approach is adaptable and can ride the tides as our business evolves – whether that’s geographically, through new technologies or due to changing regulations.

Creating exciting and accessible ways for our employees to give back, building ambassadors within our Communities and engaging senior leadership are foundational elements we’ve worked hard to build. Change is inevitable, and welcomed. We focus on our core purpose through this change, continuing to sustain the positive impact we have on the world.”

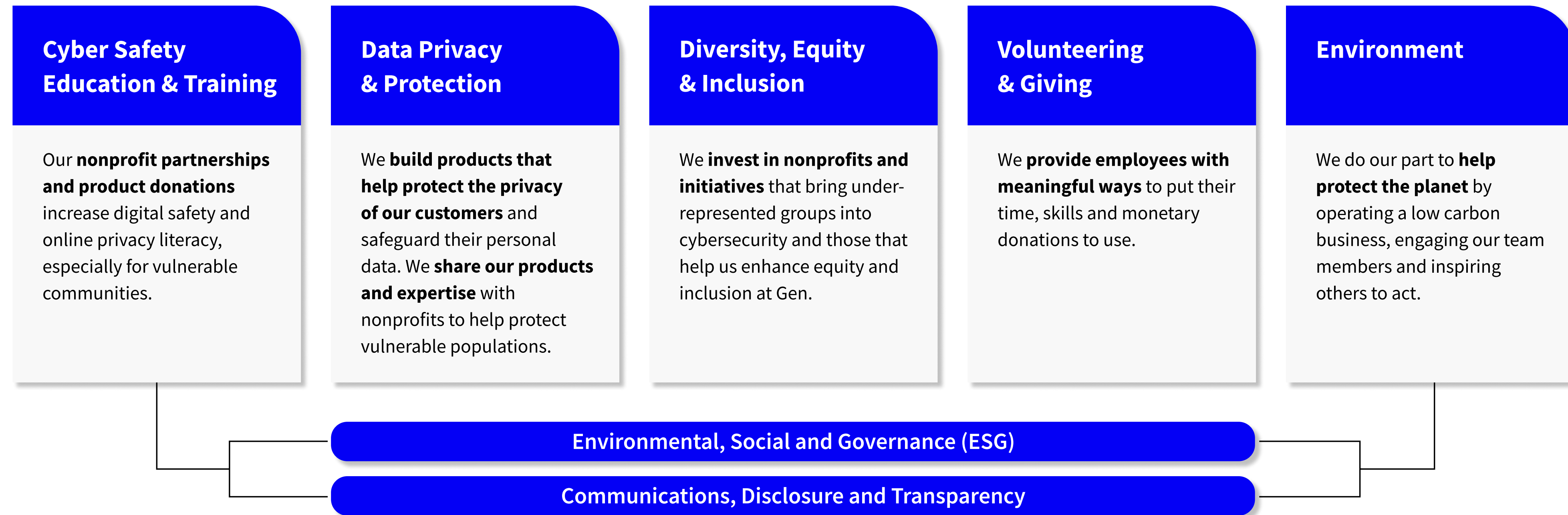
Kim Allman

Head of Corporate Responsibility and Public Policy, Gen

Where we focus our efforts

Our corporate responsibility (CR) strategy is rooted in five areas: Cyber Safety education and training; data privacy and protection; diversity, equity and inclusion (DEI); volunteering and giving; and the environment. These areas were selected based on the outcomes of a formal environmental, social and governance (ESG) prioritization assessment, conducted in collaboration with a third-party expert. Our most recent materiality assessment was completed in 2023.

Management of ESG topics and our commitment to transparent communication and disclosure underpin all our work. These topics are addressed in this report and on our [social impact website](#).



> Learn more about our priority issues assessment, as well as governance of CR, Board oversight of ESG risks and our approach to stakeholder engagement on our [website](#).

Pursuing our goals

We define the progress we want to make through annual and multi-year targets across our priority areas. Targets help us enhance accountability for results and challenge our teams to push boundaries. We track our year-over-year performance against these targets to measure performance and pinpoint opportunities for improvement that can propel us in the years to come.

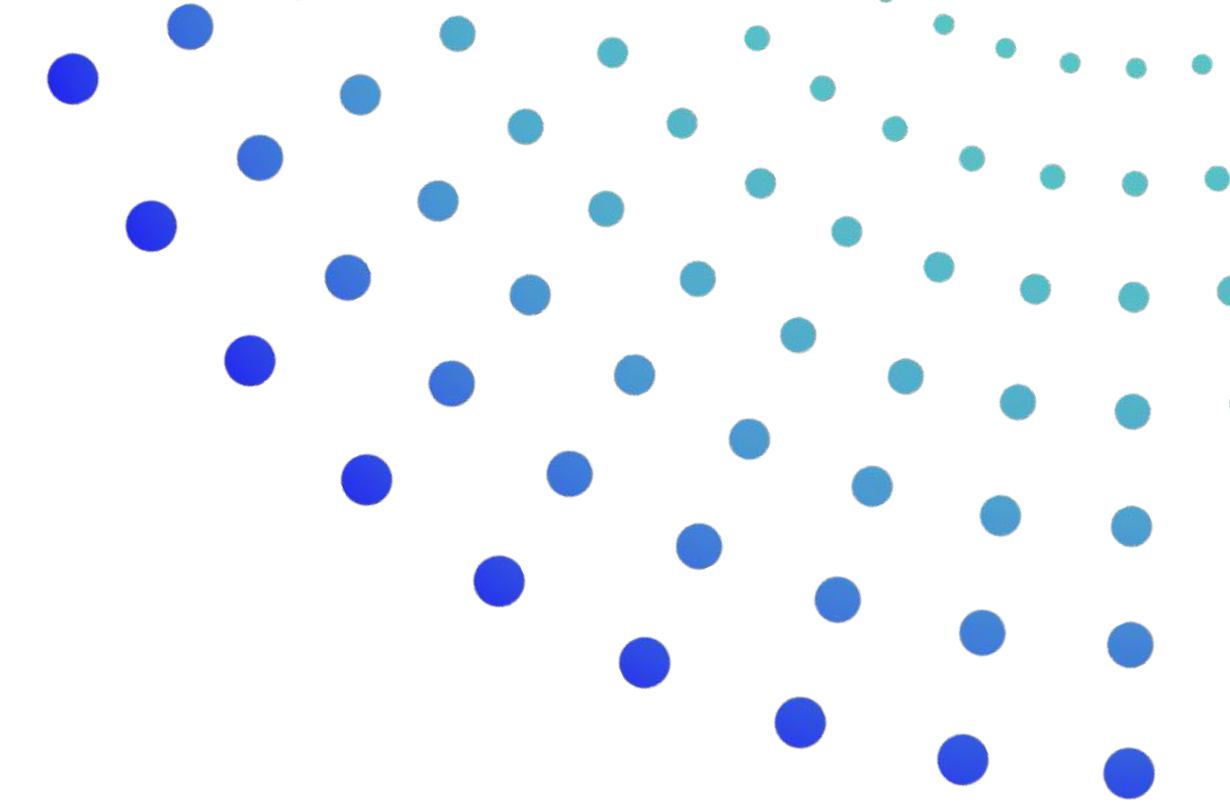
Our targets are set by engaging senior leaders, and from insights gleaned through benchmarking best practices and peer efforts. We couple these targets with key performance indicators, which are tracked and shared internally.

SUSTAINABLE DEVELOPMENT GOALS

As a signatory to the United Nations Global Compact, we continue to support their ten principles and this report serves as our annual Communication on Progress. We also support UN Women, the United Nations entity dedicated to gender equality and the empowerment of women; the United Nations Free & Equal, a campaign for equal rights and fair treatment of LGBTQ+ people; and the Universal Declaration of Human Rights.

> Learn more on [our website](#) and in the [Global Reporting Initiative \(GRI\) index](#) of this report.

³ Throughout the report, references to 2024 or past/future years, refer to Gen's fiscal year, unless otherwise noted. For example, fiscal year 2024 includes April 1, 2023 – March 31, 2024.



Cyber Safety Education & Training

Goal: By 2024,³ reach 4 million people.

Target achieved | 5.3+ million people reached.

(2023: 2.8 million people reached).

Diversity, Equity & Inclusion

Goal: By 2024, 35% of our global employees are women; 17% of our U.S. employees are URM; 8% of U.S. employees are Black.

Progressed | 34% of our workforce were women; **17%** of our U.S. employees were URM; **7%** of U.S. employees were Black.

(2023: 34% of our global employees were women; 15% of our U.S. employees were URM; 6% of U.S. employees were Black).

Volunteering & Giving

Goal: By 2024, 40% of our team participates in Giving@Gen programs.

Target achieved | 55% of employees participated in program.

(2023: 33% of our employees participated during the first five months of the program).

Goal: By the end of fiscal year 2024, 10,000 nonprofits received free or reduced-cost products.

Progressed | 9,778 organizations received free or reduced cost products.

(2023: 9,214 organizations received free or reduced-cost products).V

2024 Performance highlights

5.3M+

people reached through our Cyber Safety education and training programs

\$6.1M+

in charitable giving

9,750+

nonprofits received product donations, totaling \$2.9M USD

100%

of active employees completed our Code of Conduct training

1,000+

projects completed through the Sustainable Home Improvement Program

22%

reduction in Scope 1 and 2 GHG emissions

34%

women in our global workforce

40%

of Board of Directors self-identified as women

Awards & recognition



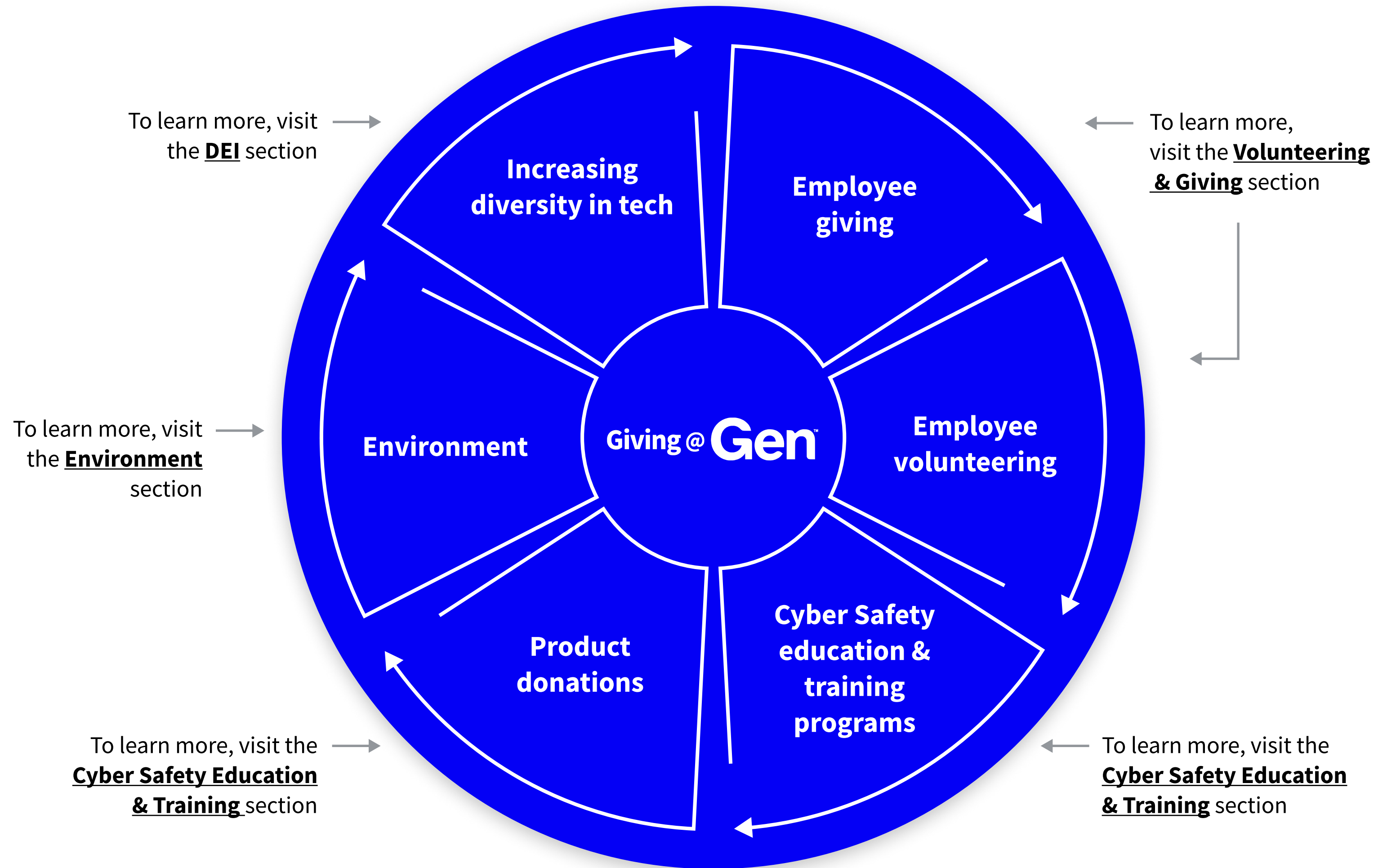
⁴ 2023 Civic50 Honoree awarded in 2024

Giving @ Gen™

Within our CR strategy, Giving@Gen is our community impact approach that champions Gen’s social impact and business ambitions: Advancing Cyber Safety, increasing diversity in tech and caring for the environment.

Our partnerships and investments support the diverse digital safety needs of families, youth, educators and vulnerable populations. Through nonprofit partnerships, product donations and employee volunteering and giving, we help create the curriculum, resources and programs to help individuals navigate their digital lives safely and with more confidence. We embed a DEI lens across all of our Giving@Gen initiatives.

In 2024,⁵ 11,000 organizations were reached through Giving@Gen programs.⁶



Diversity, equity & inclusion (DEI) is embedded across our giving

81% of our grants in 2023 had a DEI component

⁵ Throughout the report, references to 2024 or past/future years, refer to Gen’s fiscal year, unless otherwise noted. For example, fiscal year 2024 includes April 1, 2023 – March 31, 2024.

⁶ This includes financial investments, software donations, employee matching programs and volunteering.

Cyber Safety Education & Training

We believe the internet is a powerful tool and that everyone should be able to live freely online. Through partnerships with leading nonprofits and product donations, we work to empower children, families and vulnerable communities with the tools they need to keep their digital lives safe and secure.



Advancing digital safety

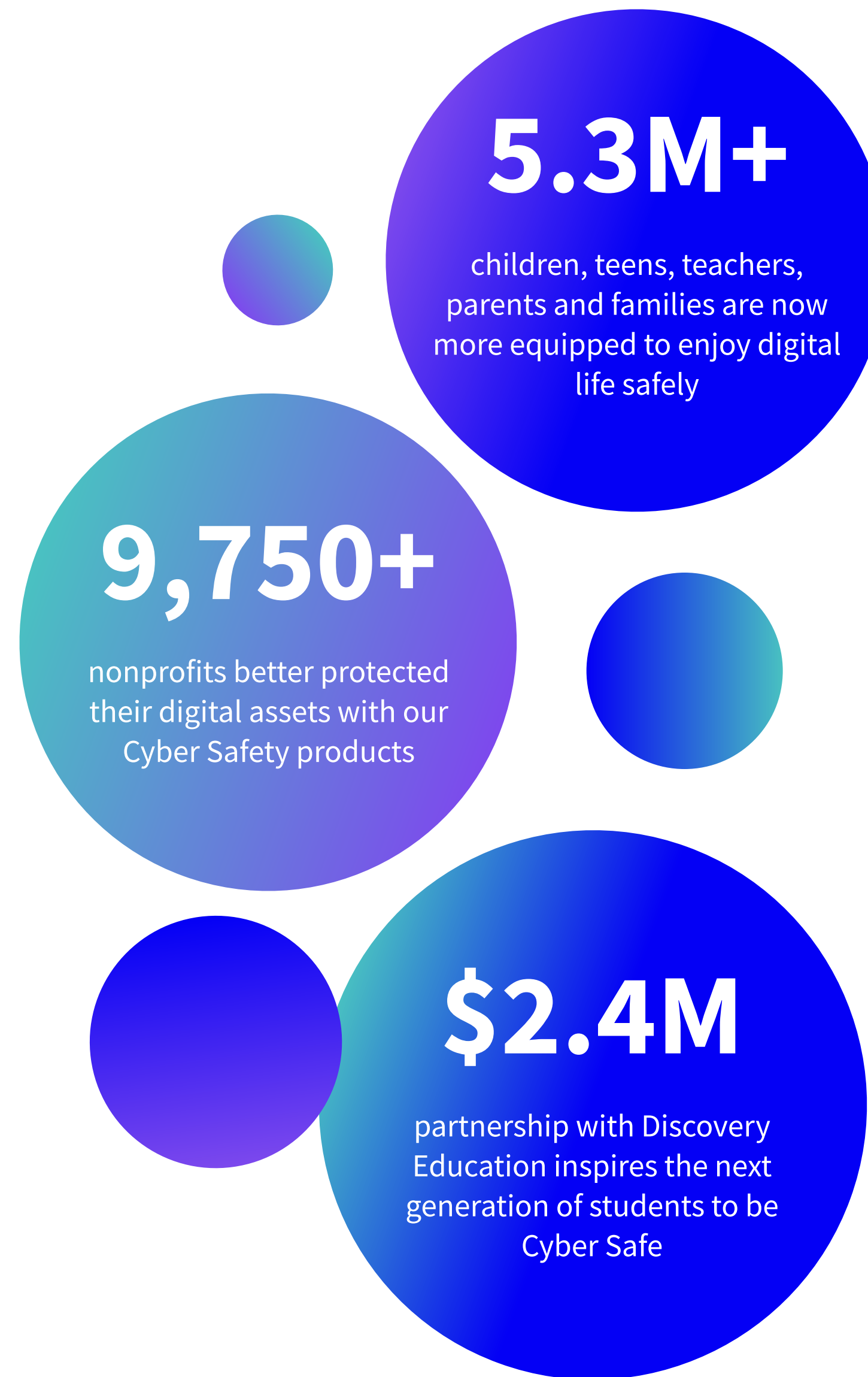
We're inspired by our unique opportunity as a global leader in consumer Cyber Safety to put digital safety knowledge and tools into the hands of children, families and vulnerable communities. We also do our part to eliminate the gender gap in tech by helping women thrive in cybersecurity careers and reach their full potential.

More than half of our grants in 2024 were directed to our Cyber Safety education and training programs. At the start of 2024, we set a goal to reach four million people through these efforts. Our impact far surpassed this, educating and empowering 5.3+ million people to stay safe online. We also continued our product donation efforts, equipping more than 9,750 nonprofits with critical cybersecurity products.

Global partnerships

We team up with nonprofit partners that match our determination to help people stay safe online and share our commitment to a future that's digitally secure. These partnerships help us scale our reach to communities in need. In addition to receiving funding, our nonprofit partners also benefit from our own expertise, learning new Cyber Safety skills for their organization and building best practices across their other programs. Cybersecurity is always evolving, and with our nonprofit partners, we share insights on emerging topics. For example, we're discussing what the responsible and safe use of AI means for youth, teachers, families and communities. We look forward to incorporating AI learnings into future tools and programs.

- > Learn more in the [diversity, equity and inclusion \(DEI\) section](#) about our work with nonprofit partners closing the gender gap in cybersecurity.



Online safety skills for youth

Keeping young people safe online requires tools and practice. Of U.S. teens using social media, 88% witness mean or cruel behavior, and 67% observe others joining in those negative behaviors.⁷ In 2022, Norton launched a \$2.4 million, multi-year partnership with [Discovery Education](#) to create My Digital Life.⁸ My Digital Life is a collection of videos, courses and other resources created with the intention of making Cyber Safety an everyday practice. This resource center, designed for educators of children ages 8 to 13, includes lesson plans and interactive tools on subjects like cyberbullying, privacy risks, misinformation and making good choices online.

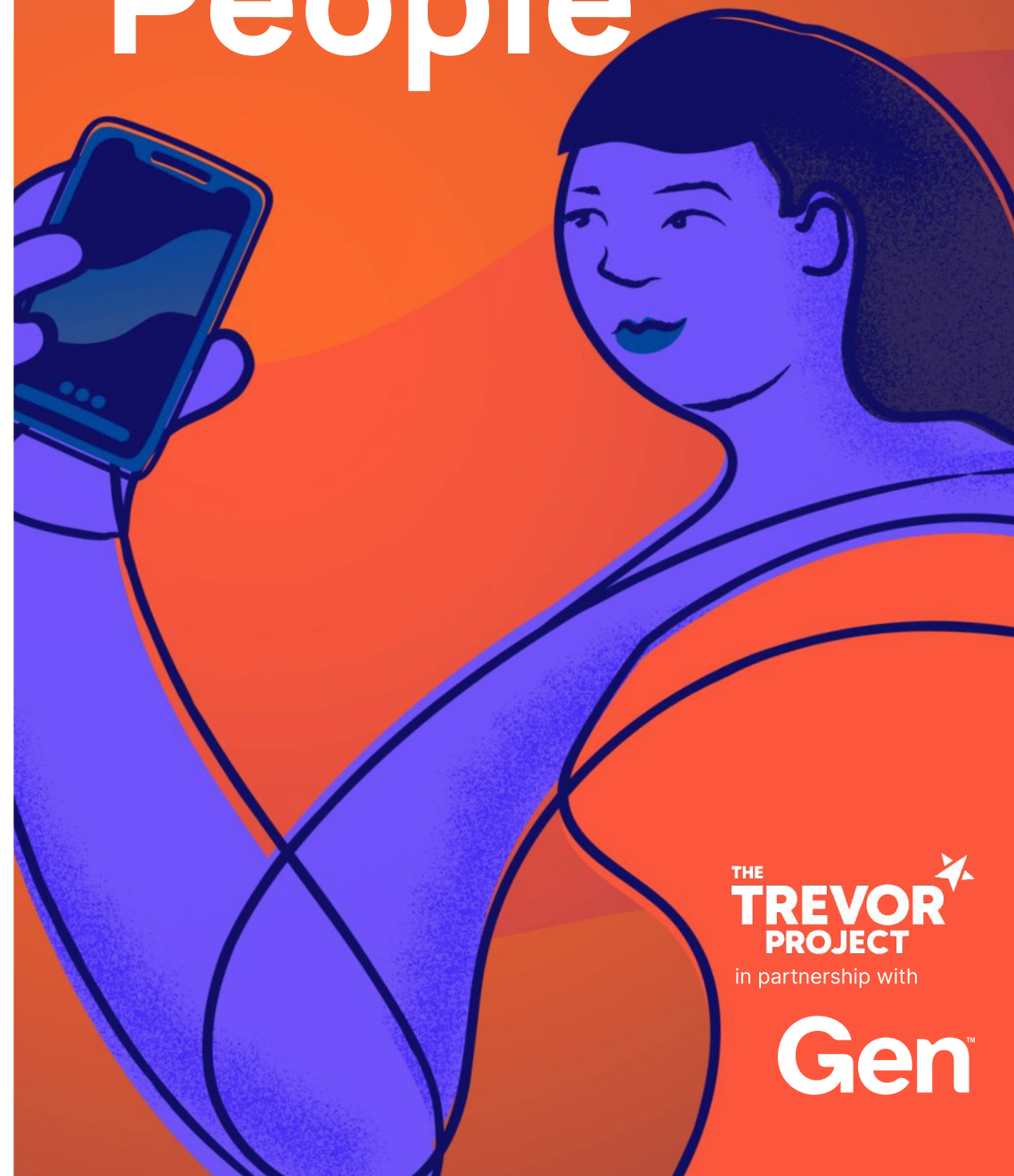
My Digital Life is now one of Discovery Education's most viewed channels. As of April 2024, it reached more than 160,000 U.S. students across 1,100 school districts in 49 states, with 63% in low-income areas. The program's expansion to the U.K. has reached more than 5,000 students since the launch in October 2023. And we're not stopping there. We plan to expand the partnership into Europe, India and Latin America in the coming years.

- > Read more on our [Impact blog](#).

⁷ [My Digital Life](#)

⁸ Through My Digital Life, we also partner with the National After School Association (NAA) to reach additional teachers and students.

Online Safety for LGBTQ Young People



Online safety for LGBTQ+ young people

We're committed to understanding the unique challenges that vulnerable communities face online, including those who identify as lesbian, gay, bisexual, transgender, queer or questioning (LGBTQ+). Research shows that almost twice as many LGBTQ+ students reported being cyberbullied compared to heterosexual students, which can have negative consequences such as emotional distress, mental health issues and suicidal thoughts and attempts.⁹

We believe LGBTQ+ youth should be able to freely navigate the digital world. To that end, Gen partnered with [The Trevor Project](#) in 2024 to create the first ever [Guide to Online Safety for LGBTQ+ Young People](#), a free resource that helps queer youth do just that. The guide has reached thousands of people through social media, email, direct download and other outlets. It provides helpful information on how youth can navigate the online world more safely. It also highlights how to find safe, supportive communities of likeminded peers and allies.

One such community is [TrevorSpace](#), The Trevor Project's online platform that serves more than 400,000 LGBTQ+ people, ages 13-24. Our support helps bolster the program, which gives queer people and allies a platform to share interests and make connections.

> Read more on our [Impact blog](#).

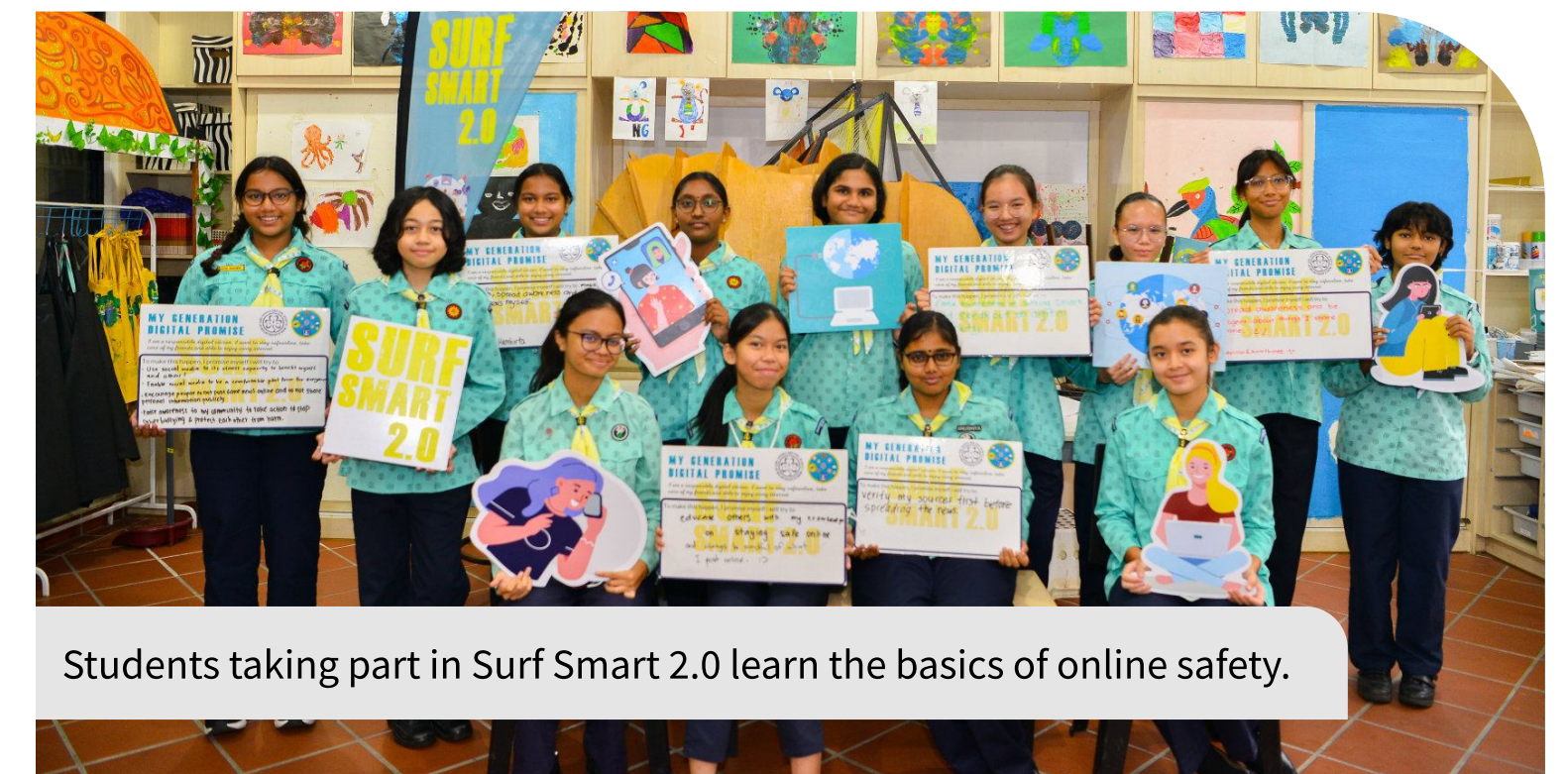
⁹ "Bullying, Cyberbullying, and LGBTQ Students," Cyberbullying Research Center, 2020.

Girl Scouts learn how to Surf Smart

Threats against the rights of young women, including online, continue to mount. We feel the urgency to act and know we can help by providing tools to support girls. [Surf Smart 2.0](#), created by Norton and the World Association of Girl Guides and Girl Scouts (WAGGGS), is a badge-earning course that teaches the basics of online safety for girls and youth between the ages of 5 and 25. More than 80,000 Girl Guides and Girl Scouts have earned their Surf Smart badges since 2022, 680,000 since the program began.

In 2022, our partnership entered a new phase. We rolled out the Global Advocacy Fund in 2023, which teaches young people not only to be responsible digital citizens but ways to make the internet a better, more inclusive place. "Smart Surfers" create their digital advocacy campaigns using the skills they learn through Surf Smart 2.0. The program reached 140+ young women in six countries by the end of April 2024, and we hope to achieve similar impact in 2025. Additionally, the Surf Smart 2.0 curriculum was downloaded more than 8,000 times via Campfire, WAGGGS' online hub and website.

> Read more on our [Impact blog](#).

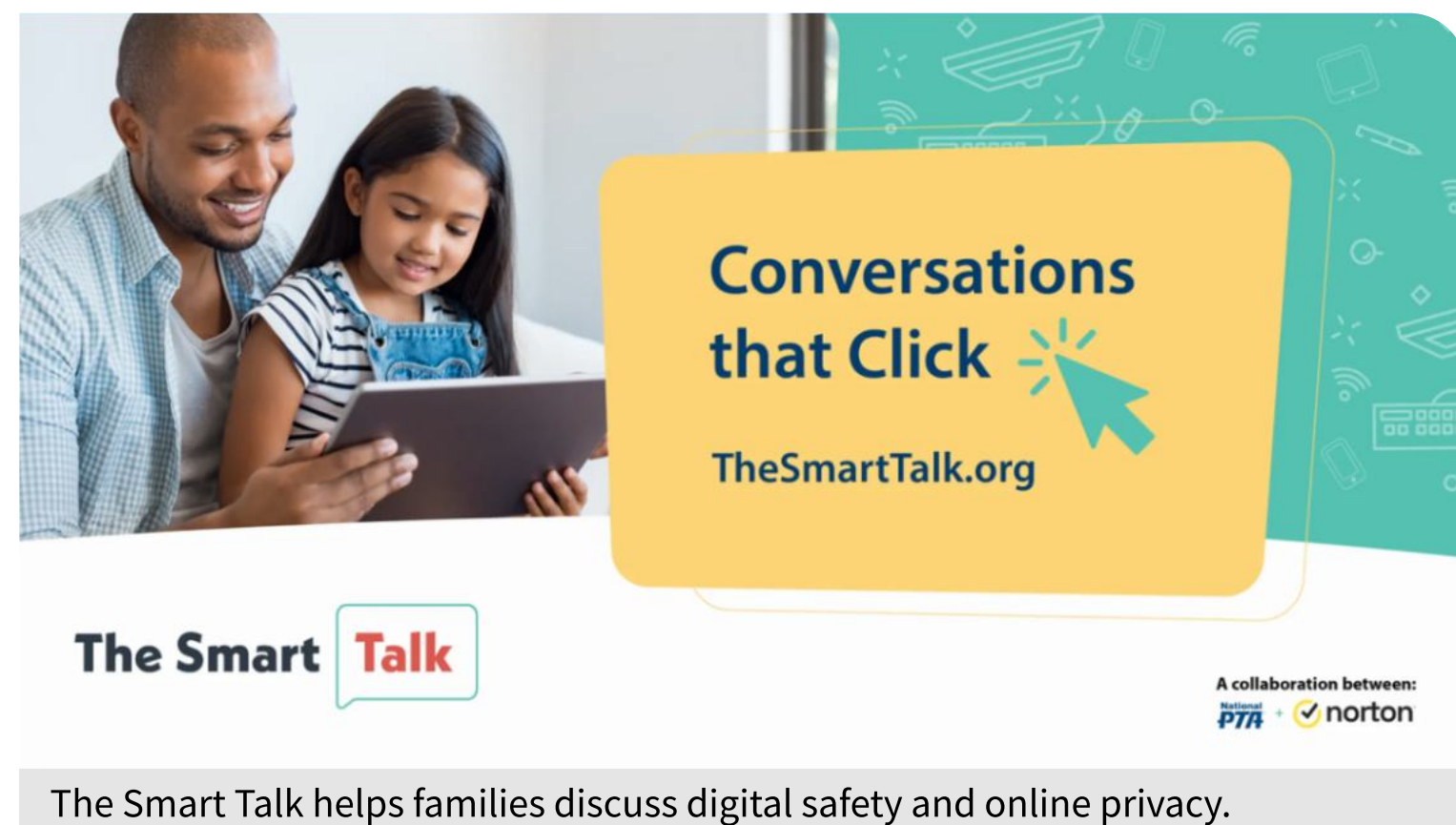


Students taking part in Surf Smart 2.0 learn the basics of online safety.

Talking digital safety to kids and teens

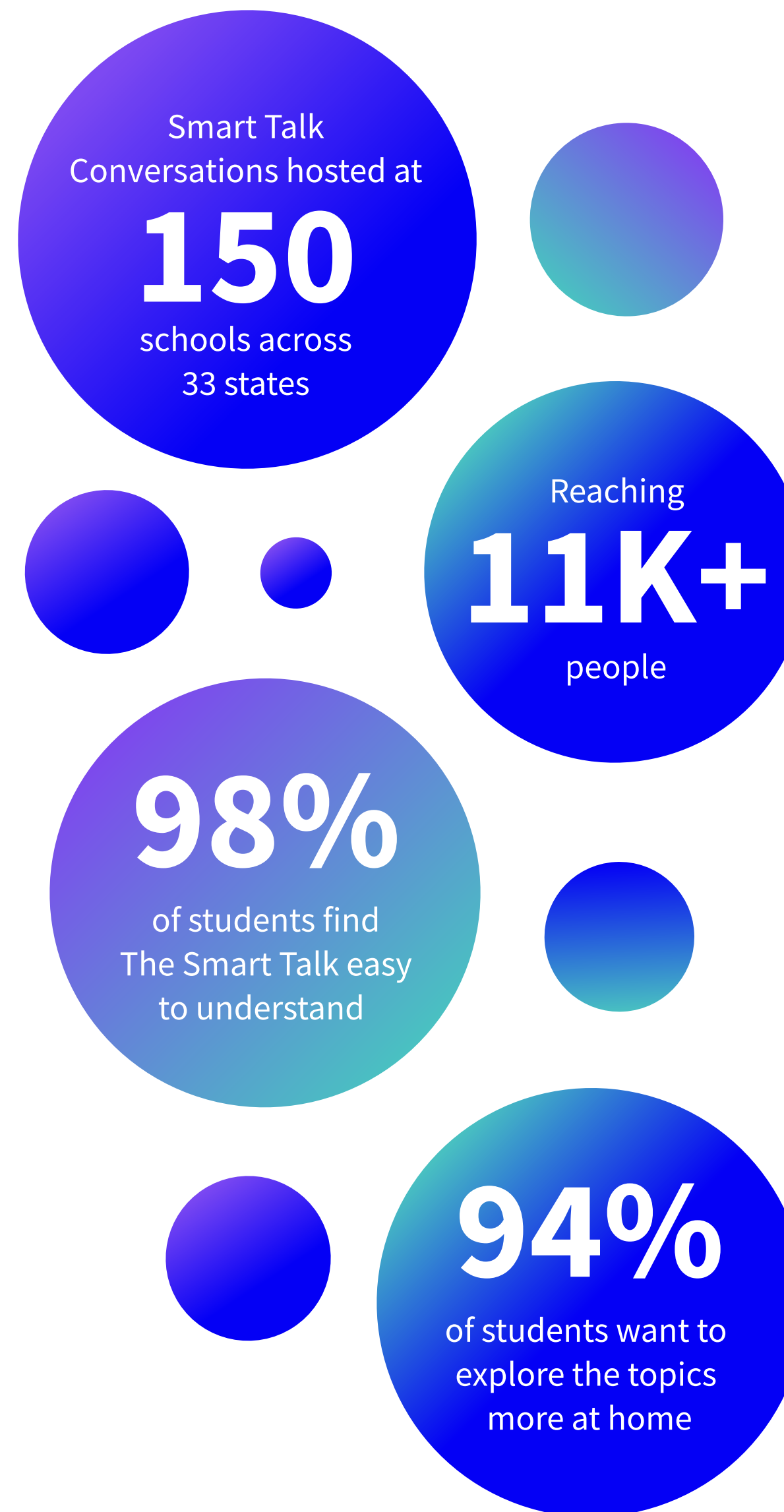
An estimated 43% of children in the U.S. ages 8 to 12 own smartphones,¹⁰ and their online safety is at the forefront of many parents' and caregivers' concerns. That's why Norton and the [National PTA](#) came together in 2015 to create a free resource, [The Smart Talk](#).

Nearly a decade later, the tool, which was updated recently, continues to help families talk candidly and openly about digital safety and online privacy. In the 2023-2024 school year, we continued to host The Smart Talk Conversations at more schools, reaching students across the country. Of the parents and caregivers who took part, 98% say they feel more comfortable exploring online safety topics with their children, and 92% of PTA leaders plan to host more of the events.



¹⁰ "The Common Sense Census: Media Use by Tweens and Teens," Common Sense Media, 2021.

¹¹ "The Growing Threat of Cyberbullying in India," International Journal of Enhanced Research in Education Development, 2023.



Digital safety skills in India

Research shows that India has the highest prevalence of online harassment for children.¹¹ With employees, partners and customers in India, it's a region close to our hearts. Gen supports Save the Children India's "Creating a Safe and Enabling Experience for Children Online" initiative. It educates parents, caregivers and policy makers in the region about the unique Cyber Safety risks for children and the importance of online safety. In 2024, we directly reached more than 10,000 students, parents and teachers, including more than 8,300 children, across 40 government schools, with online safety education and training. Online awareness campaigns and social media helped expose another 3.3 million people to online safety educational content.



Students in India learn about Cyber Safety through Save the Children's online safety education and training.

Donating products to those who need it most

At Gen, we donate and significantly discount select Norton and Avast products for those who need them most through our product donation programs. We reach leading nonprofits with longstanding partner [TechSoup](#), and middle and high school students with the [National Consumers League's](#) Life Smarts Program. We continue to expand the products available, such as adding Norton Secure VPN to the TechSoup offerings this year. Further, in a program specific to the Czech Republic, we provided free Avast Business subscriptions valued at \$33,000 to 13 nonprofits, many of them working in education or with seniors in palliative care.

We work with partners to address the needs of vulnerable communities. Based on our longstanding work with the [National Network to End Domestic Violence \(NNEDV\)](#), we know that domestic violence survivors are extremely vulnerable to technological abuse. For example, 97% of domestic violence programs report that abusers misuse technology to stalk, harass and control victims.¹²

At the end of 2024, we launched a pilot donation program for victims of domestic violence by partnering with TechSoup to grant up to 5,000 free product licenses to organizations serving this population. With TechSoup and NNEDV, we also teamed up to provide information and resources on how best to use the products to enhance survivors' safety.

In 2024, we gave \$100,000 as part of a multi-year commitment to support NNEDV's [Safety Net](#) and [Economic Justice](#) initiatives. We also donated products directly to NNEDV, including annual subscriptions to Norton 360 Deluxe and LifeLock Identity Theft Protection for their employees.

> Read more on our [Impact blog](#).



Donated
\$2.9M
of product in
retail value.

¹² ["2023 NEDV Year In Review,"](#) National Network to End Domestic Violence, 2024.

Volunteering & Giving

Our people are united around a shared purpose and culture of giving. One of our core values is being Community Minded. We work with each other and our nonprofit partners to propel positive change in the communities in which we live and work.



Gen employees in Dublin (Ireland) come together and support their community.

Transforming communities

Our team members are eager to get involved and contribute, giving their time, money and expertise to the causes they care about.

The Gen Giving Hub, powered by Benevity, provides our teams with a seamless way to participate in Giving@Gen, offering volunteer, giving and educational opportunities in one easy-to-use place. Today, more than 55% of our people volunteer or give, exceeding Benevity’s industry benchmark by 30% and our goal to achieve 40% participation during 2024.

In 2024, we started a new Site Leader program to enhance local engagement with global company efforts. This program connects functions across each site including Workplace, People & Culture, Brand and Communications, DEI, Corporate Responsibility, and Wellness – to plan events that resonate with local employees. Site Leaders help execute local communications and gatherings, spotlighting specific causes our employees care about and opportunities for our various business functions to give back.

Volunteering

We create space for our teams to give their time and talent in communities, in ways that fit their preferences and schedule. This includes:

- Communities@Gen involvement (our employee resource groups)
- First-ever Gen Volunteer Day, dedicated to supporting communities across the globe
- Company-wide challenges throughout the year that reward employees’ good deeds and actions
- Volunteering with Gen’s Cyber Safety education and gender equity nonprofit partners
- Five days of paid volunteer time off per year
- In-person local and regional events
- Team-building volunteer activities
- Skills-based volunteering

We help our employees and business functions utilize volunteering and giving to connect with their stakeholders. For example, in collaboration with the sales team, we offered both internal and external participants at the Cyber Safety Summit the opportunity to assemble care packages for children at a local hospital. The People & Culture Wellness team incorporated giving opportunities during Breast Cancer Awareness Month and helped employees navigate stress during the holiday season with nonprofit partner Play for Peace.

> To learn how Gen employees support the environment, visit the [Environment section](#); for more information about how we support gender and racial or ethnic diversity, visit the [DEI section](#).

55%
of our employees participate in volunteering or giving programs

6,100+
hours our employees devoted to making a difference

\$220,000+
donated to charities by Gen employees



Gen employees in London (United Kingdom) give their time and talent.

Giving

Gen matches employee donations and inspires team members to find the causes important to them when they are most timely:

- Our Matching Grants program matches one corporate dollar for every dollar donated by a team member annually to eligible causes.
- Special 2:1 matching campaigns, such as for Giving Tuesday, bump up donations so every dollar means more.
- The Dollars for Doers program rewards team members with a \$20 credit to donate to a charity of choice for every hour of volunteer service or every educational webinar they attend.¹³
- Curated opportunities by the Corporate Responsibility team through the Gen Giving Hub support monthly themes or causes related to current events.



Gen employees come together during Global Volunteer Week in Tempe, Arizona (U.S.).

Impact highlights

With more than than \$6.3 million in overall giving and 6,100+ hours of service, volunteering and giving totals for 2024, we exceeded last year's achievements and this year's goals. Four of our largest activations are good examples of the pure scale of the global team's engagement and the intersection of giving with key company milestones and events.

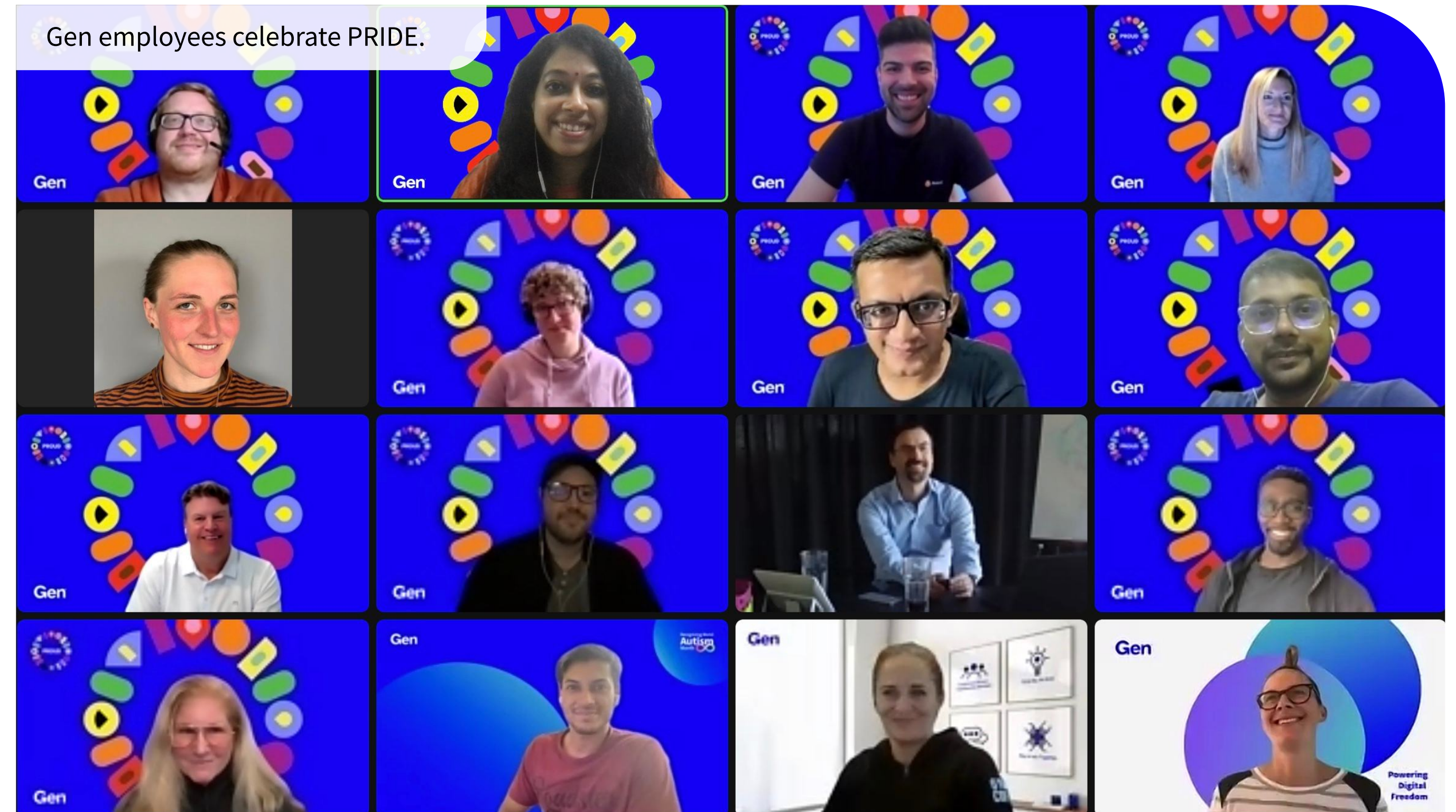
Global Volunteer Week	Back to School	One Year of Gen	Giving Tuesday
<p>Gen employees around the world came together from April 8-12, 2024.</p> <p>14 Gen sites</p> <p>1,300+ volunteer hours</p> <p>1,000+ lives impacted</p> <p>33 non-profit partners helped us host in-person and virtual volunteer opportunities in India, Ireland, Czech Republic and the United States</p>	<p>Team members supported back to school efforts in their local areas, gifting schools, teachers and students monetary and supply donations, as well as volunteer time.</p> <p>209 employees volunteered</p> <p>540+ hours</p> <p>535 children reached</p> <p>\$22,000+ donated to local organizations</p>	<p>To celebrate our first year as a newly combined company, we rewarded each employee with \$50 to donate to a charity of their choice.</p> <p>2,000+ team members supported their favorite causes</p> <p>\$135,500 in donations</p> <p>916 causes supported in 10 days, including providing humanitarian relief to U.S. military veterans, cancer patients in the Czech Republic and global LGBTQ+ safe spaces</p>	<p>We provided a 2:1 match for any monetary donations given by employees on Giving Tuesday.</p> <p>\$424,000 in total donations and matching funds by Gen</p> <p>Nearly 430 causes</p> <p>300+ employees donated, including every person on Gen's leadership team</p>

¹³ The Dollars for Doers and Matching Grants programs have a combined cap of \$2,000 (or local currency equivalent) per employee per year.

Communities in action

The Corporate Responsibility team partners closely with our DEI team and Communities@Gen to bring thoughtful experiences to employees. These include:

- Our all-employee virtual Pride parade, hosted by our PROUD community, extended to local organizations across the globe, including [Saathii](#) in India, [Sapliq](#) in Slovakia, [Outhouse LGBTQ+ Centre](#) in Ireland, [Sbarvouven](#) in Czechia and [The Trevor Project](#) in the U.S. The closing panel featured diverse perspectives on the issues the LGBTQ+ community faces globally and locally. Note: this was in last year’s report, but PRIDE will not take place until after the report launch.
- Our Hispanic employee Community, HOLA, supported [In Full Color](#) for National Hispanic Heritage Month and had the opportunity to listen to the stories of diverse artists.
- POWER, our Black employee Community, launched a mentorship program for Black students in partnership with HBCU Heroes with 18 students participating.
- During Neurodiversity Month, THRIVE, our employee community empowering those with disabilities, invited the South Arizona Autism Society to speak to employees on the importance of creating inclusive spaces for all.



Charitable giving

In 2024, we gave our Communities@Gen the chance to take giving into their own hands. Each Community received a grant for up to \$2,500 to donate to a charity of their choice. The initiative allowed Communities to personalize giving that aligns with them, as well as Gen’s DEI goals and social impact causes. The only requirement was that each grant help create engaging employee experiences with the nonprofit such as volunteer events, speaking engagements or giving campaigns.

- > Read more about corporate philanthropy, including product donations, on [page 17](#).
- > Read more about Communities@Gen in the [DEI section](#).

90% of our Communities@Gen participated in personalized giving

Diversity, Equity & Inclusion

We respect people of all backgrounds and foster inclusion. Our goal is to create a community where each person can bring the best of their individual selves to work each day.



Gen employees in Tempe, Arizona (U.S.).



Celebrating our differences

Gen prioritizes embedding a culture of diversity, equity and inclusion into everything we do. While this was a year of continued integration of the Avast and NortonLifeLock teams, we were able to solidify our approach to DEI for our new combined Gen team.

We have a dedicated DEI team reporting to our Chief People & Culture Officer, who has leadership accountability for our DEI strategy and programs. The Nominating and Governance and Compensation and Leadership Development Committees of our Board of Directors are key stakeholders and provide oversight and active engagement in our DEI strategy.

As part of our culture and leadership fabric we are committed to increasing diversity through our four pillar DEI strategy. We closely monitor data to evaluate progress and accountability. Through Communities@Gen, our employee resource groups, we're educating, inspiring and uniting members and allies who drive our unwavering commitment to inclusion. We're engaging the best global partners to increase visibility of careers at Gen. And we're offering development programs and mentorship opportunities for underrepresented team members.

> Visit the [appendix](#) for a list of DEI policies and commitments.

Knowing where we stand

We closely manage our representation data to measure progress and regularly drive accountability, sharing diversity scorecards with our executives and their teams to reflect progress. These scorecards include actual representation data and targets, as well as a plan to achieve these targets. We are collectively working to increase the global representation of women and underrepresented groups in the U.S., including but not limited to racial and ethnic representation. We're also conscious of the shift in equity progress and are working hard to increase gender diversity across our business.



34%
of our global workforce self-identify as women

34%
of Gen leaders self-identify as women

17%
of our U.S. team are from underrepresented backgrounds

40%
of our Board Directors self-identify as women

Gen employees in Tempe, Arizona (U.S.), attending a global All-Hands Meeting.

Our DEI targets

In 2024, women made up 34% of our global team, compared to 32% in 2023. 34% of leadership (Directors and above) and 40% of our Board of Directors self-identified as women.¹⁴ We continued to achieve gender parity for the independent members of our Board of Directors. Underrepresented racial/ethnic diversity was 17% of the total U.S. population¹⁵ in 2024, up from 15% in 2023.

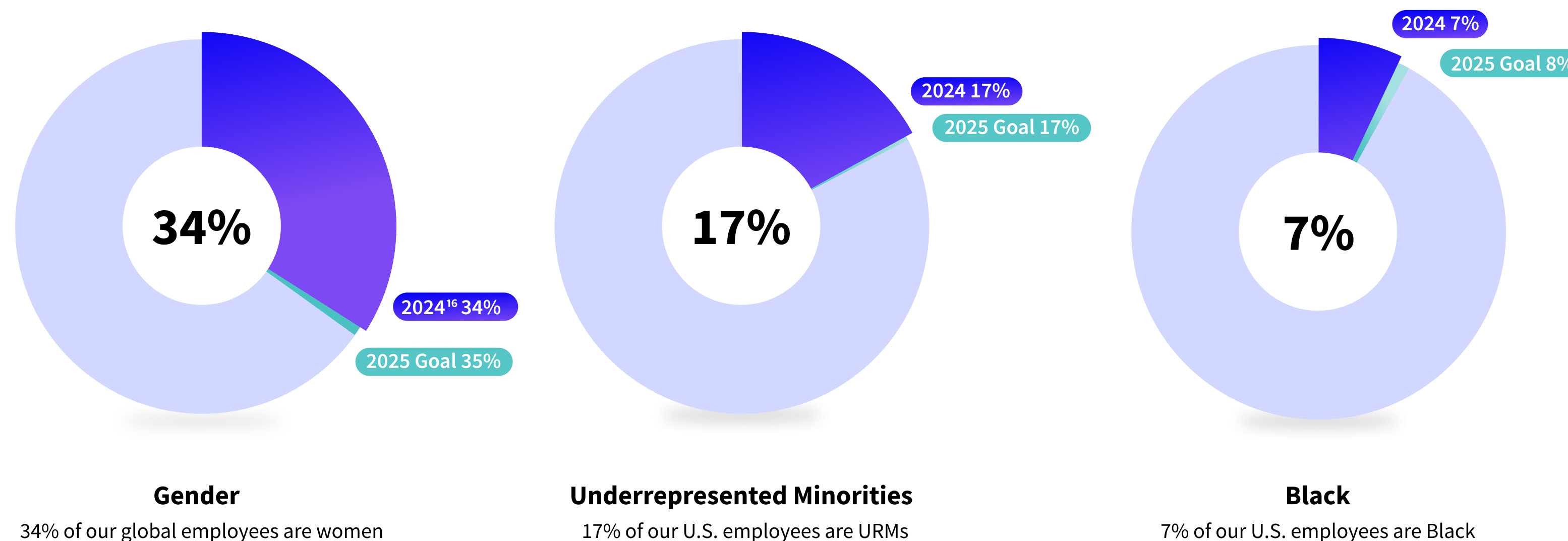
We also maintained traction on hiring diverse candidates:

45% of full-time hires, originating outside of Gen, identified as women

40% of full-time hires, originating outside of Gen, identified as underrepresented minorities

22% of full-time hires in the U.S., originating outside of Gen identified as Black

> Scroll to the bottom of the [Governance section](#) of our [Investor Relations page](#) for our most recent U.S. EEO-1 Component 1 Data Collection Report.



Diversifying our teams

We strive to be thoughtful about how we can attract and retain talent to represent our global marketplace. Our Talent Acquisition team uses diverse interview panels to make sure candidates feel most comfortable and get an opportunity to see themselves at Gen.

We actively posted nearly 200 job openings through our CR partners – WomenWhoCode, Czechitas, YearUp, Women4Cyber and Disability:In – who provide new avenues for reaching diverse candidates. We partner with Communities@Gen as a source of education, insight and referrals to fuel our recruiting efforts. And we offer additional referral bonuses for team members who introduce a diverse candidate who is successfully hired.

This year, Talent Acquisition and DEI partnered to standardize an internship program for diverse talent that can be easily replicated across our regions. We’ve started with 15 interns in the U.S. and will continue expanding to India and the Czech Republic.

Gen also engages with leading global partners to promote women in tech. The benefit is twofold, amplifying the visibility of career opportunities and aligning with our CR goal to support nonprofits that empower women in tech.

¹⁴ For the most accurate picture of our teams, we ask new hires and team members across the globe to self-identify important characteristics such as race, ethnicity, veteran status, disabilities, sexual orientation and pronouns.

¹⁵ Total U.S. population includes those who did not select a race/ethnicity

¹⁶ Throughout the report, references to 2024, or past/future years, refer to Gen’s fiscal year, unless otherwise noted. For example, fiscal year 2024 includes April 1, 2023 – March 31, 2024.

Our partners closing the gender gap



Their work:

- Created a roadmap to eliminate the gender gap in European tech.
- Includes creating awareness, promoting tailored education and training programs, running a long-term mentorship program for junior cybersecurity professionals in Europe, supporting and shaping gender-inclusive policies and establishing partnerships, both within the EU and abroad.

Our impact:

- \$150,000 per year for three years will add content to their Academy, offer mentorships with Gen employees and contribute to the expansion of new chapters.
- In the second year of our partnership, we have helped Women4Cyber to expand their activities across Europe, sponsoring their first-ever in person conference, reaching over 800 women through mentorship activities and over 700,000 through social media awareness campaigns. In addition, 20 Gen employees participated in a speed-mentoring event with the Women4Cyber community, helping to give junior cybersecurity professionals and insights and advice to advance their careers and grow their networks.



Their work:

- Helps women in the Czech Republic build digital skills and transition into the tech industry.
- Connects women graduates to companies seeking IT talent.

Our impact:

- In 2024, our funding supported 13 events, including Czechitas' Digital Academies, and educated more than 3,640 women.
- Supported the development of the Cybersecurity Digital Academy, a new intensive course; Gen volunteers mentor students completing the course.



Their work:

- Support technology certifications for women in Europe to advance their careers.

Our impact:

- We've created a Gen Testing Academy at our Brno hub, where 22 women received training and testing needed to pass the ISTQB/ASTQB certification.



Participants of the Gen Testing Academy in Brno (Czech Republic).



Read more on our [Impact blog](#) about our partnership with the Nasscom Foundation to run The Cyber Security Skills Development Initiative for Women in India.

Welcoming everyone

Gen is committed to inclusivity. Our employee resource groups, called Communities@Gen, help educate, inspire and unite members. They give us a new lens through which to make important company decisions, such as new pipelines for diverse talent and expanding inclusive benefits. Working with our CR team, they advance learning, mentoring and [volunteering](#).

Curious team members can delve deeper into other cultures through our Global Discovery Series. These one-hour sessions highlight Gen locations across the world, spotlighting India and the Czech Republic in 2024, and the U.S. in 2025.

Awareness and cultural inclusion consciousness are also built into our Code of Conduct training, which 100% of our active team members completed in 2024.

Engaging and advancing individuals

We aim to support career growth for those at Gen and to broaden entry points for graduates of all backgrounds to join our team. This includes:

- Intentional development programs and mentorship opportunities for team members. In 2024, we piloted a coaching program tailored for leaders from diverse backgrounds; 26 participated and we will continue to expand our coaching program in FY25. Working with our employee community POWER, we also launched a mentorship program in partnership with HBCU Heroes, reaching 18 graduates.
- Gen partnered with Out & Equal's Global Workplace Summit to help professionals, experts and community leaders create spaces in which LGBTQ+ team members can thrive.
- McKinsey Academy training programs provided for current and aspiring Black, Hispanic/Latino and Asian leaders. In 2024, 49 people enrolled and networked with leaders both within and outside of Gen. They followed a rigorous online learning program to develop business acumen and leadership qualities they can bring back and pass down to their teams.



Our People

Everything at Gen starts with our people and culture. Our values unite and guide us. We play to our unique strengths, yet know we are more powerful together. We put the right people in the right roles to drive outcomes and act with passion, purpose and energy to win.



Gen employees in Tempe, Arizona (U.S.).

Hiring and developing the best talent

As we continued to come together as a team, we kept the very best of our legacy companies and started to build our new shared culture as Gen. At the center of our culture are [our values](#), which are foundational to everything we do. They celebrate diversity, promote teamwork, inspire customer centricity and encourage a growth mindset. Our approach to providing a great environment and people programs is embodied in [Life@Gen](#), which gives our team members the flexibility and support to think big, innovate and thrive through challenging, yet exciting work.

Recruiting talent

Our talent acquisition process utilizes cross-functional approaches, tools, technologies and partners to attract the best possible team. From the initial contact with a potential recruit, the Talent Acquisition team provides a warm and engaging experience, highlighting learning and development opportunities and our mentorship culture. Our People & Culture and Corporate Responsibility teams work closely to showcase how employees can get involved in our social impact programs.

After laying the foundation for a refreshed culture, in 2024 we moved forward together with unity and purpose. Our efforts focused on our end-to-end employee experience and finding the balance between efficiency of digital operations and the need for human interaction. We bring our values to life through awareness and engagement, showcasing those who exemplify our values and a continued focus on building our culture across our global population.

- > Learn more about how our Board oversees human capital management (HCM) in the [Governance section](#).

For example, during onboarding, all new employees receive information on Giving@Gen and Communities@Gen and how they can get involved. We follow up with new recruits to get their feedback and continue to improve our processes and our onboarding of new team members.

- > Read more about our approach to inclusive recruitment and hiring in the [DEI section](#).



Gen interns in Tempe, Arizona (U.S.).



Gen helps team members grow personally and advance professionally.



Talent development

Aligning our DEI and Learning and Development strategies and initiatives is a top business priority at Gen. One of our primary programs for achieving these goals is RISE Learning. It provides a suite of offerings, including accessible learning options, career growth and development support, mentorship and networking. Team members and interns have immediate access to this program from day one of their career journey.

Accessible learning

We build our learning initiatives to help team members personally and professionally grow, advancing their careers and investing in cultivating the world-class talent and expertise our business needs. These include:

- 5,000+ on-demand learning modules
- Workday platform for team members to create Individual Development Plans, establish goals, identify skills to grow and socialize and track development goals with People Leaders
- Monthly learning and development topics
- TED@Work series includes hundreds of curated TED Talks for individuals and teams
- LEADS Community supports and promotes the development of early-in-career team members
- Education reimbursement helps team members pursue professional and educational certifications, including language skill development

Leadership development

We offer thorough learning paths and well-equipped toolkits for leaders at all stages of their career development. In 2024, we entered the third year of our University of RISE (U RISE) leadership program, which inspires and invests in current and aspiring People Leaders to develop them into more empathetic and bold leaders. The program offers comprehensive course options and group learning opportunities with best-in-class content from Harvard University.

To date, hundreds of recognition badges and certificates have been awarded to participants, recognizing their achievements. Participants from across the globe meet on dedicated channels to discuss specific modules, ideas and plans to co-create a truly global group learning and coaching experience.

Mentorship and network

The RISE Mentorship Program is our internal global mentorship program. It pairs people based on the attributes mentees are looking to develop. Mentors benefit in-kind by sharing their experiences and expertise. Sessions take place at least once a month and the relationships last three months with an option to continue. Monthly TED@Work discussion sessions are held to support the growth and development of mentors within the program and to develop their leadership and communication skills. The program has continued to grow with nearly 100 mentors and 60 active mentor/mentee pairs.

#TeamGen connection and collaboration

We foster a culture of continuous improvement and welcome team member feedback. In addition to direct engagement with People Leaders, we've developed an ongoing feedback channel for all teams through regular Engage surveys. We measure overall engagement via our employee net promoter score (eNPS),¹⁷ as well as inclusion, seeking feedback on specific topics to help us continuously improve life at Gen for our employees.

More than 80% of team members participated in our Engage surveys.¹⁸ Our leadership team listens to and discusses the feedback and takes action to address any issues or areas of opportunity. We share results and proposed actions through our All-Hands meetings, via organizational groups, our Change Engagement group and with our Board following each survey.

Inspire is Gen's peer-to-peer recognition program. It allows individuals and leaders to show their appreciation of a colleague's commitment to promoting or shaping the Company values while delivering outstanding performance results. We're pleased to see the inspire program contributing to a culture of gratitude and appreciation — something we believe is important, especially among peers. Additionally, our CX Awards, another peer-to-peer recognition channel, celebrates excellence in both internal and external customer service.

The 2024 Genovator Roadshow visited seven locations across the world, highlighting everyone's unique role in fueling growth as one Team Gen. Our CEO and leadership team hosted interactive sessions and Q&As, both in-person and virtually, to connect with Genovators around the world and encourage teams to come together in support of our mission, our objectives and our culture. 2,250 Genovators joined the roadshow kick-off, with 1,400+ joining the in-person and virtual engagement sessions.

We also introduced the Suggestion Hub, a new tool where team members can provide feedback and ideas about everything from process improvements, to policy updates, to culture-related activities. Gen then takes this feedback to regularly improve the employee experience. In less than a year, we've already had thousands of interactions; combining suggestions, views, upvotes and comments. Suggestions made by Genovators have inspired a culture of collaboration and solution co-creation amongst individuals and teams who wouldn't ordinarily work together. In the first six months since its launch, a range of improvements have been implemented, which positively contribute to the overall employee experience at Gen; in the domains of technology and IT, process simplification and culture.



Gen CEO Vincent Pilette joins team members in Prague (Czech Republic).



Gen team members gather in Prague (Czech Republic).



¹⁷ eNPS measures employee satisfaction and loyalty.

¹⁸ Data as of October 2023. Engage survey ended in October and new employee engagement survey platform will be identified in FY25.

Benefits

Gen offers a competitive total rewards package, including benefit programs that support the body, mind and financial well-being of our people. This includes healthcare; a robust and equitable wellness program; life, disability and retirement programs; all that provide a safety net in the case of unexpected events and to help team members plan for their future.¹⁹

In 2024, we refreshed our time off program, which we call "My Time Off" (MTO), to provide team members the flexibility to take time off to recharge and spend time with family and friends. In most cases, team members are now eligible to participate in our MTO program upon hire. The MTO program is made up of Paid Time Off, including regular statutory, service or carryover leave where applicable, plus Unlimited Time Off. We also extended our global Wellness & Fitness Reimbursement Program to eligible employees who work a minimum 20 hours a week.

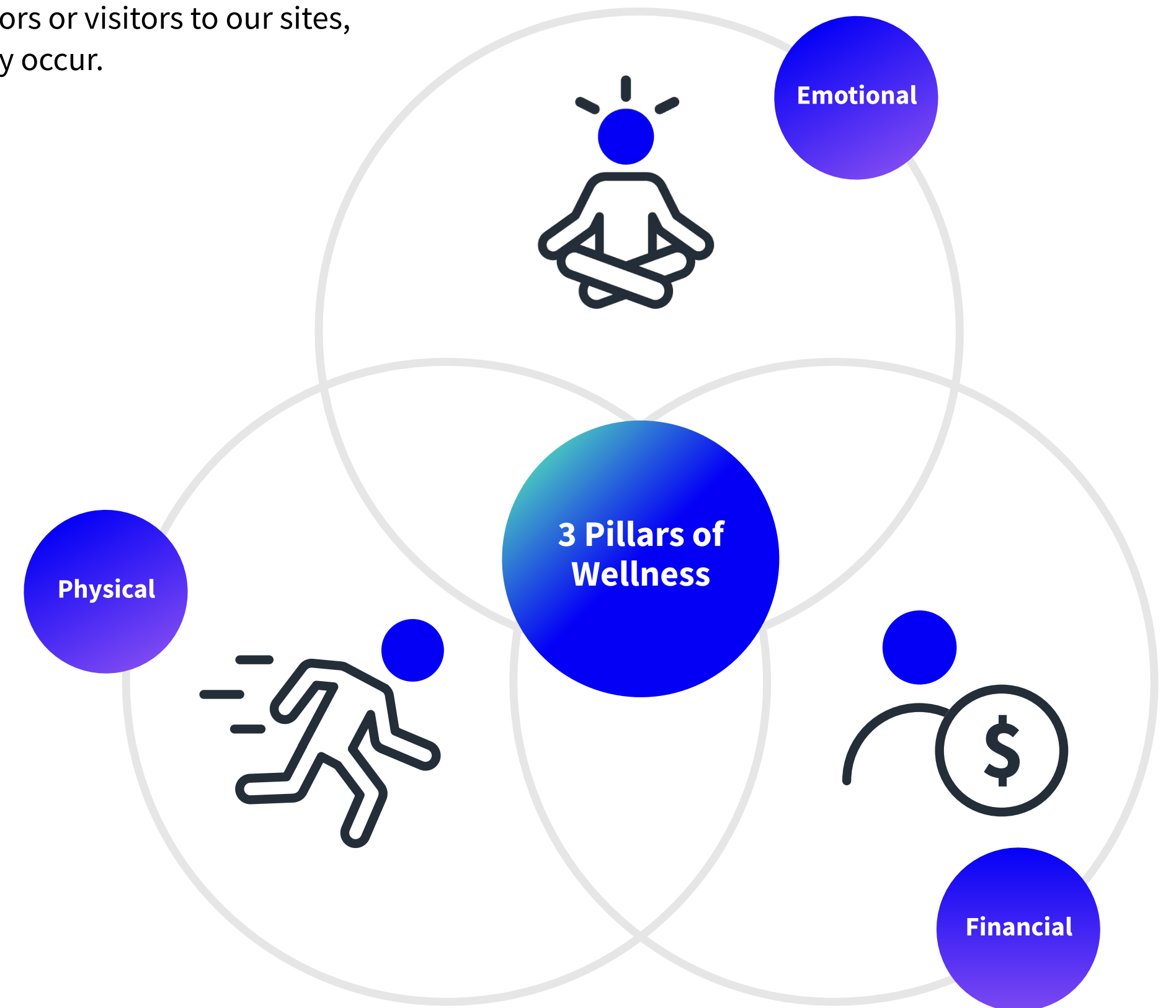
A focus on mental health and wellness is a key component of our employee benefits package. Through our employee assistance program (EAP), employees, and each of their family members, may receive multiple complementary counseling sessions every year, as well as enjoy access to a library of online resources.

> Learn more about Gen's [compensation approach and employee benefits](#).

We regularly bring employees together to discuss topics such as neurodiversity, mental health, the challenges faced by people living with disabilities and racial injustice. In 2024, we held more than 80 wellness events, reaching approximately 6,500 participants across 14 locations, hosted in-person and virtually. In partnership with our THRIVE Community, we facilitated discussions about patient advocacy. Our Move More and Resilience challenges encouraged team members to flex their physical and mental strength, collectively moving more than 209,000 kilometers (130,000 miles) and completing almost 1,000 resilience exercises. And our Corporate Responsibility team, PROUD Community and social impact partner The Trevor Project, trained Gen team members on LGBTQ+ mental health.

Communities@Gen are a partner in socializing benefits and have shaped our benefit programs to be more inclusive. For example, through engagement with our PROUD Community, we updated our U.S. adoption policy adding second parent/domestic partner adoption.

Gen is committed to the health, safety, security and wellbeing of its employees. Our approach to workplace health and physical security includes protecting our people and the information we manage. Our emergency action plan prepares in advance for an emergency at any of Gen's offices. Our Global Physical Security and Safety department helps protect the health and safety of employees, contractors or visitors to our sites, should an emergency occur.



¹⁹ Part-time employees are eligible for MTO program as well as holidays, prorated based on hours worked. Employees working 20 hours a week are eligible for the Wellness/Fitness Reimbursement Program.

Data Privacy & Protection

We protect people, not just devices. Our award-winning technology solutions protect nearly 500 million users. We have one of the world's largest consumer Cyber Safety networks and the insights and guidance people need to stay safe online.



We empower our customers to take full advantage of the digital world – safely, privately and confidently.

Expanding Cyber Safety

Gen empowers individuals, families and leading institutions to be Cyber Safe. Our products range from core security to identity and privacy to trust-based solutions.

Cyber Safety

Protecting your digital life

Adjacent Trust-Based Solutions

Empowering you to live a full digital life



“ Looking back at the past year, powering Digital Freedom resonates more than ever. It’s not just an idea, it’s been our driving motivation for all the work we do. This last year, we’ve set new standards for protecting consumers and innovating within the security landscape, making the digital world a safer place for everyone.”

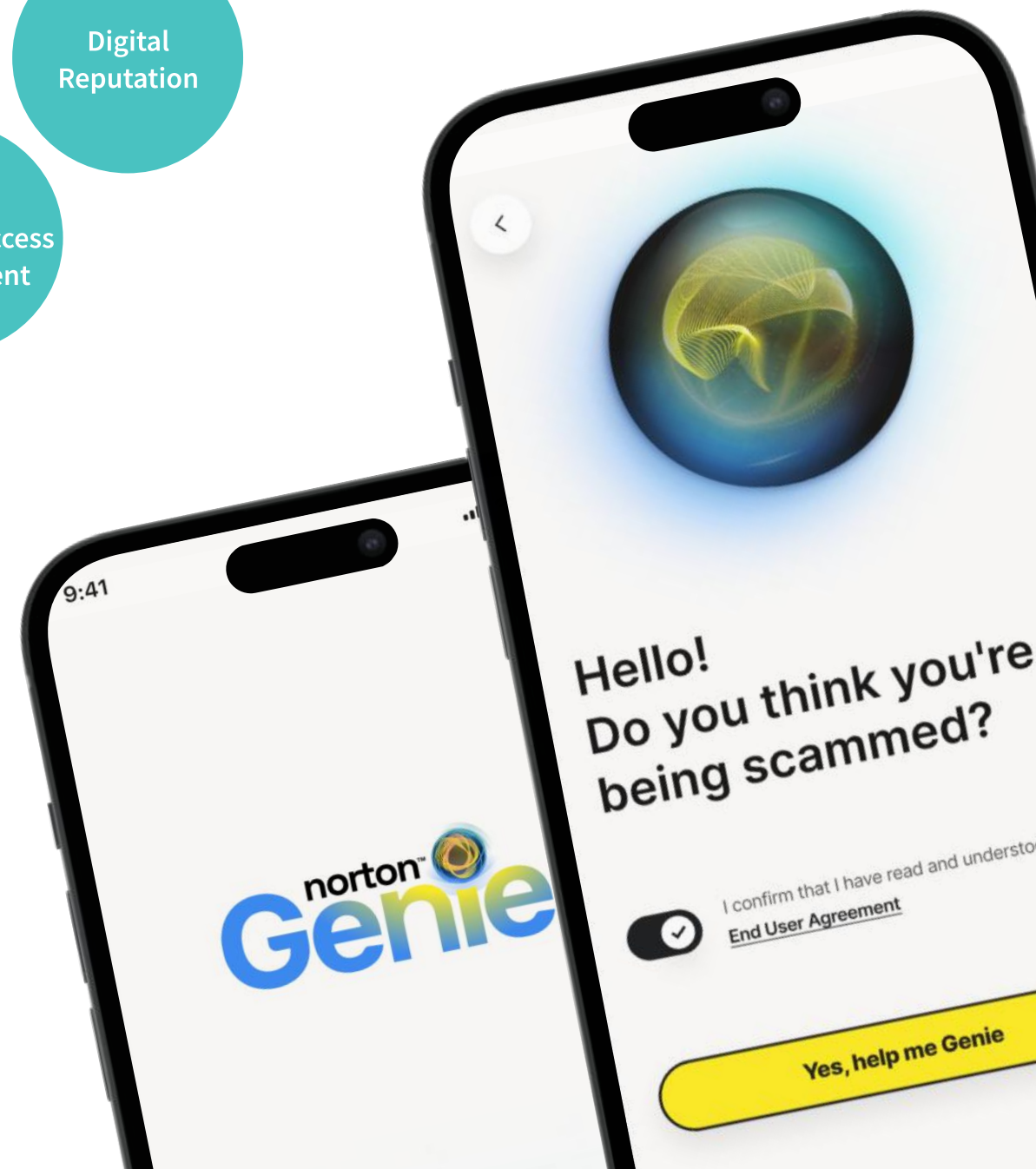
Vincent Pilette
CEO & President

²⁰ Based on performance during April 2022-April 2023

10B+
Cyberattacks blocked
in the past year

9%
of revenue was
invested in R&D²⁰

100%
of full-time employees
completed our Code of
Conduct, Security and
FTC training



Embracing innovation

During 2024, Gen continued to expand as a Cyber Safety powerhouse tackling the challenges of today and into the future. We've scaled up our global coverage to more countries and delivered AI-enhanced products.

In 2024, our research and innovation approach remained customer-driven, beginning with how people experience digital safety. It is also capability-driven, with new technology developments driving product development. We leverage foundational innovations, such as artificial intelligence (AI) and large language models, to provide cutting-edge and best-in-class backend and frontend security solutions.

9% percent of revenue in 2024 was invested in research and development (R&D), including:

- Our ongoing Privacy R&D program that informs our privacy portfolio and the Identity Innovation Research program that shapes the future of our identity products
- The Digital Trust Services team that advances accessible technologies to build trust online
- New areas of Identity Protection, such as using AI/ML to help users detect fraudulent Buy Now Pay Later accounts and expanding identity protection on the dark web to cover new countries, including Brazil and Mexico

- Norton Genie, an industry leading AI-powered scam detection tool available for free on desktop, as a mobile app or via a web browser interface
- Norton Private Browser, a free product for browsing online safely while protecting privacy, provides users with a secure password manager and the ability to block ad trackers
- Norton Private Email, a feature of AntiTrack, helps keep a user's email address private and tracker-free
- Norton Safe Email, a free tool that protects up to five email addresses against scam emails and malicious attachments
- Our Human Centered Digital Safety initiative that explores responses to evolving, human-driven events, such as phishing and social engineering

Ethical product development

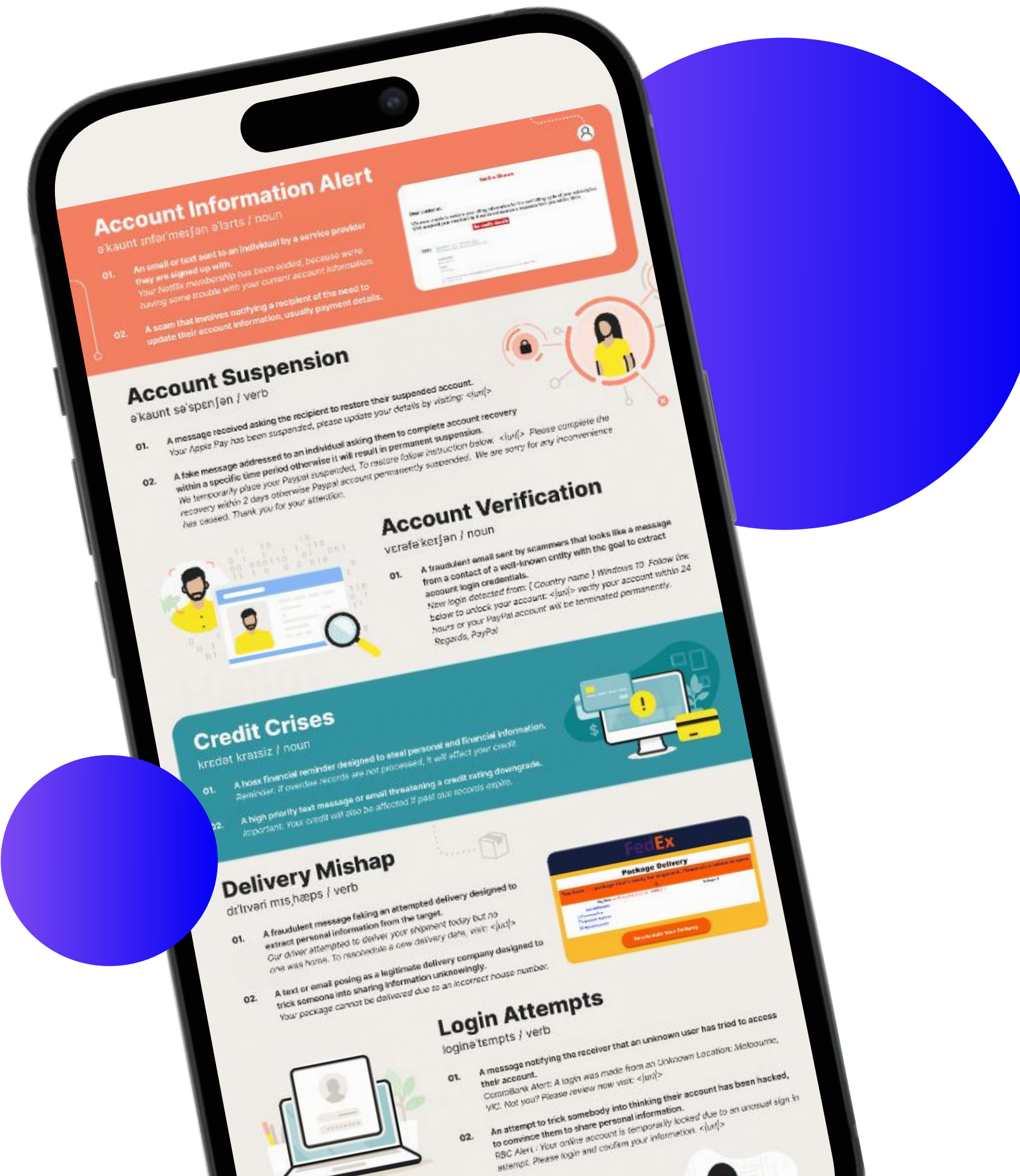
The product team continues to review product accessibility and make changes to color contrast, text sizes and content labels to improve accessibility for all. To help consider how our product may impact people or the planet, our Head of Corporate Responsibility and Public Policy is part of a cross-functional product working group that meets monthly. This group considers how Gen can embed social and environmental considerations into new and enhanced products. Visit accessibility policies for our brands here: [Norton and LifeLock](#), [Avast](#), [AVG](#) and [CCleaner](#).



Educating and protecting

We want Cyber Safety to be part of how people act and think every day. That's why we complement the leading digital safety tools we offer with education, tips and awareness, as well as research, on critical Cyber Safety problems facing consumers and society. Just a few examples include:

- Our “[Cybersecurity predictions for 2024](#),” from Gen Chief Technology Officer Michal Pěchouček
 - The Norton Genie [consumer campaign](#), with Emmy® award winning creator Dan Levy, to bring awareness to the need for scam detection and education
 - The [Avast Threat Report](#), released quarterly, shares the latest insights and trends on the greatest risks our team sees
 - Our inaugural [Cyber Safety Sunday](#) is a day of action to help holiday shoppers prepare themselves and their devices to safely and confidently shop online
 - Norton’s [Phictionary dictionary](#) helps consumers spot the telltale signs of phishing attacks
- > Learn more in the [Cyber Safety Education and Training](#) section.



76% **Did you know?** of attacks are now human-centric, not device centric.²¹ Organizations are now including Cyber Safety protection as part of their benefit package.

²¹ Gen 1st Anniversary investor Update

Protecting privacy

We only collect personal data in certain, necessary cases, and we only collect as much personal data as is needed to achieve that outcome. We reinforce privacy procedures and principles with ongoing training and quarterly risk assessments of our full operations. Highlights in 2024 include:

- Aligning data privacy practices across brands.
 - Strengthening consistency in how we protect information across Gen, from onboarding new vendors to the processing of personal data.
 - Promoting safe data handling by training 100% of our company with Gen’s Privacy by Design curriculum.
 - As we’ve scaled up our use of AI, we have minimized customer personal information in our AI systems. Where we deploy or provide products with AI features, we limit the personal data available to these systems and use features such as redaction and masking to remove unwanted or unnecessary personal data shared into these systems. Our teams conduct regular data protection risk assessments on our AI-based tools to minimize risks relating to personal data exposure.
- > Learn about our approach to [ethical AI](#) and [data privacy governance and compliance](#).

Safeguarding information

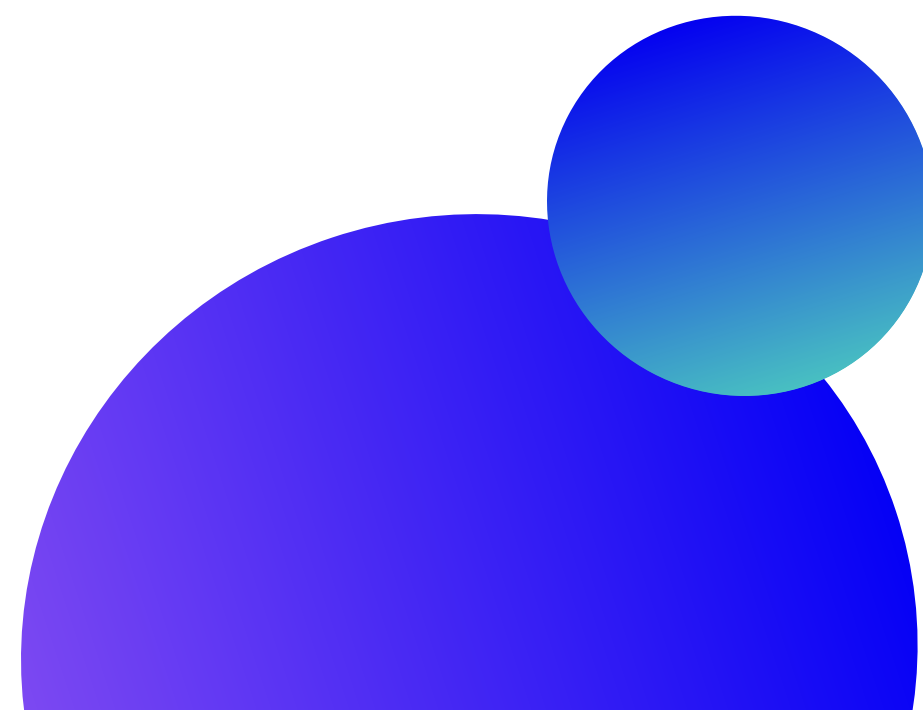
We maintain a comprehensive technology and cybersecurity program to support the effectiveness of our systems and prepare for information security risks. Our programs are assessed regularly, and we continually monitor potential security threats to safeguard the confidentiality and integrity of the information we hold. We align our information security management system to ISO 27001 and maintain an annual SOC2 Type 2 report.

Our Chief Information Security Officer remains responsible for our cybersecurity program. The CISO meets at least quarterly with the Board of Directors, including its Technology and Cyber Security Subcommittee, or the Audit Committee of the Board of Directors, in order to brief them on technology and information security matters. All Board Directors have cybersecurity and technology expertise and experience.

Our IT infrastructure and information security management systems are audited by internal or external auditors each fiscal year, and we conduct third-party vulnerability analysis, including simulated hacker attacks. Additionally, we carry insurance that provides protection against the potential losses arising from a cybersecurity incident.

Employees must follow the Gen Information Security Policy and Standards. In 2024, every Gen team member participated in security and privacy trainings. These trainings included our annual Security Awareness training, privacy trainings on the General Data Protection Regulation (GDPR) and Privacy by Design, as well as training related to U.S. trade compliance and global phishing threats.

- > Learn more about board oversight over information security in our [10-K](#).



Environment

We are doing our part to help protect the planet by operating a low carbon business and enabling our employees to take an active role in caring for the environment. We're inspired by the opportunity to do more together, so we support wider community efforts to accelerate our impact.

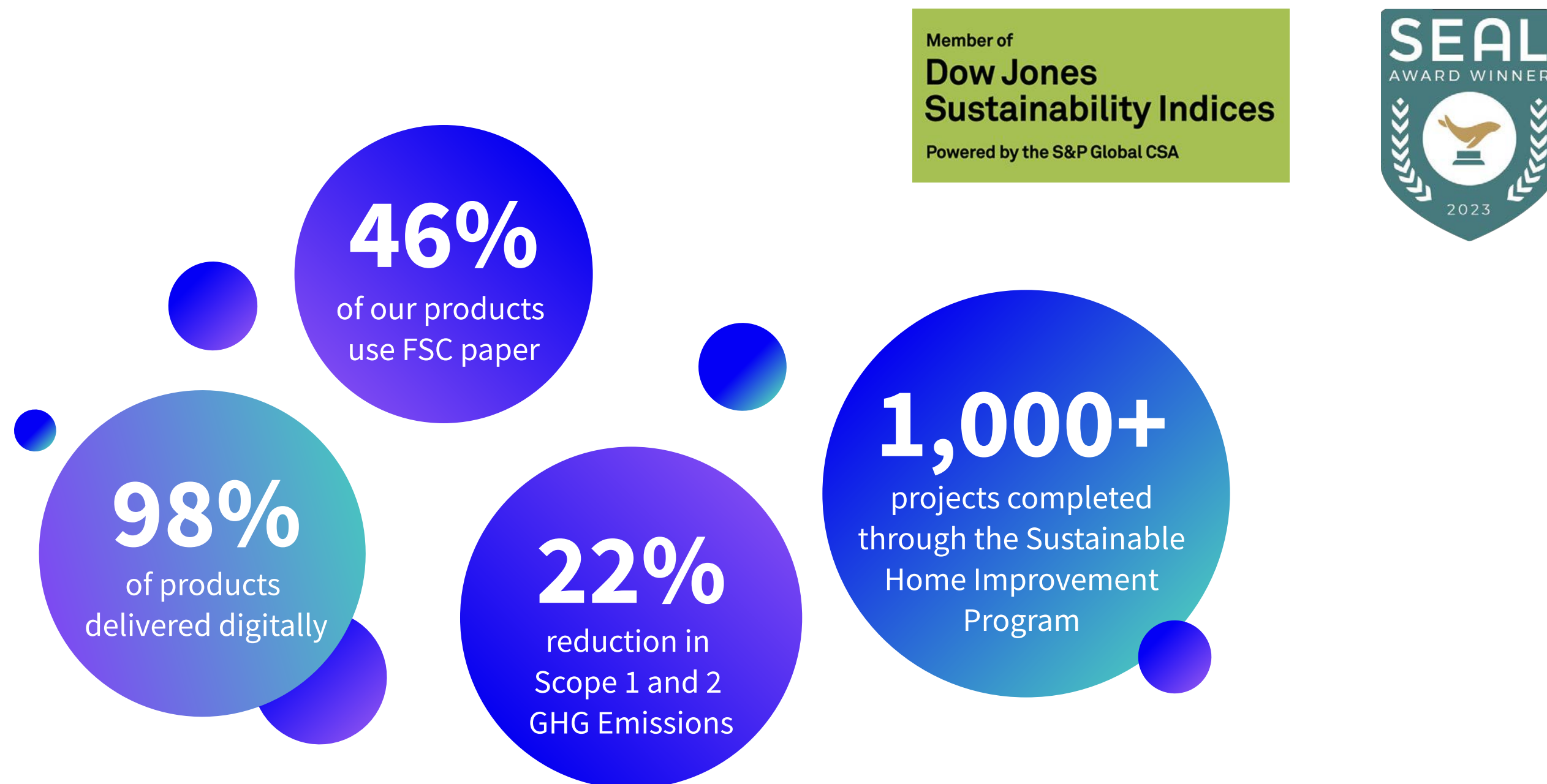


We're working hard to reduce environmental impacts.

Protecting our planet

We believe in powering Digital Freedom responsibly. Gen proactively reviews our office and data center portfolio on a regular basis and is charting a path to further reduce GHG, right size our data centers and office space, and optimize energy and water use in our facilities.

We empower our teams to use less in their homes, and we reduce the landfilling of retired office equipment and materials through our hardware reuse and recycling programs. Improving our environmental performance relies on strong collaboration and transparency across our business. Governance begins with our Board, who provides oversight for our Corporate Responsibility team, including environmental stewardship efforts. The Corporate Responsibility team leads our environmental strategy and is supported by facility managers and partners who manage energy and waste programs at our sites. Energy and emissions data for our offices is tracked and shared with the Corporate Responsibility team for owned facilities and at leased facilities where data is available.



> For more information on our environmental approach, visit our [Environmental Policy Statement](#).

Environmental Focus Area	2024 Highlights
Greenhouse Gas Emissions: Reduce GHG emissions from our operations.	Reduced total Scope 1 and 2 GHG emissions by 22% due to office and data center consolidation.
Employee Engagement: Engage and educate employees on environmental topics. Encourage sustainable lifestyle choices.	152 employees volunteered 462 hours and donated more than \$10K to environmental causes. Gen matched these donations, bringing the total to over \$30k .
Community Partnerships: Partner with environmental advocates to amplify our work.	Continued our legacy partnership with Planet Water Foundation . In FY25, we are launching a new partnership with Social Shifters , supporting young environmental tech entrepreneurs.
Sustainable Products: Reduce the environmental footprint of our products across their life cycle.	Continued our use of Forest Stewardship Council (FSC) certified paper; 46% of the paper materials associated with our physical products is FSC certified.
Supply Chain: Promote high environmental standards in our supply chain.	Our two main suppliers, who produce more than 98% of our global physical product by spend, maintain environmental management systems that are ISO 14001 certified.
Reporting: Be transparent about our progress and commitments.	Assessed compliance with California climate bills, continued to produce a Social Impact Report and aligned with TCFD reporting practices.

Greenhouse gas emissions

As a digital-first company, we work to reduce GHG emissions across our entire business. This includes careful management of emissions where our teams work, how we power our products, the trips our people take, the actions of suppliers and the use of our products. Our top priorities remain data center emissions and office energy use (Scope 1 and 2 emissions), as well as remote work, employee travel and our purchased goods and services (Scope 3 emissions).

In 2024, we decreased Scope 1 and 2 GHG emissions by 22%, with a 7% decrease in our Scope 3 emissions. These reductions were due to a variety of factors, beginning with the streamlining of our physical locations and data centers. At our facilities, we continued to optimize HVAC²² use, transition to more efficient lighting and install motion lighting for remodels. As part of our tenant improvement and space design opportunities, we have integrated daylight harvesting into the lighting control systems to help maintain a target level of interior lighting, taking into account the amount of sunlight coming through during the day. Our Building Management System (BMS) controls and monitors energy consuming systems. Together, these systems manage comfort while delivering energy efficiency and lowering operating costs.

²² Heating, ventilation and air conditioning

Sustainable products

Based on our 2022 life cycle analysis, we're working to make our products more efficient.

- 98% of products are delivered digitally
- 46% of the paper materials associated with our physical products is FSC certified
- Around 84% of our products were shipped in our three smallest packaging sizes, ranging from credit card size to DVD size
- Less than 0.5% of the material used in our global physical products contains plastic

Supply chain sustainability

Our Global Supplier Code of Conduct sets the responsible business standards to which we expect suppliers, their employees and any subcontracted parties to adhere. In 2024, we continued to request that our Tier 1 physical product suppliers agree to the social impact requirements outlined in our Global Supplier Code of Conduct. Additionally, our two main suppliers, who produce more than 98% of our global physical product by spend, maintain environmental management systems that are ISO 14001 certified.

Gen is also working with its suppliers to measure transport-related emissions on a quarterly basis. This helps uncover opportunities to optimize product transportation, which is expected to reduce both costs and related emissions.



Biodiversity

Nature is as vital to the success of our company as it is to the health of the communities we operate in. In 2024, we held an employee webinar with [Visit.org](https://www.visit.org) and our environmental Community TERRA to discuss the current state of biodiversity, its role within the Sustainable Development Goals (SDGs) and how employees can promote biodiversity through volunteering and personal actions. While we continue to promote biodiversity within our company, we are also working with our partners, such as Anthesis Group, to better understand our impact and dependencies on nature. We plan to publish a biodiversity statement in FY25.

Employee-driven eco impact

We help our teams create environmental benefits and minimize their impacts – at home, in the workplace and in their communities.

Now in its second year, the Gen [Sustainable Home Improvement Program \(SHIP\)](#) provides team members with cash incentives to help make their home life more eco-friendly and sustainable. The program not only helps employees, it also helps us address our employee work-from-home Scope 3 emissions. Through SHIP, employees can apply to receive up to \$500 per year for projects. This includes energy efficient light bulbs, electric vehicle charging, heating and cooling upgrades, water conservation tools or boosting biodiversity through composting and gardening. In 2024, more than 1,000 projects were completed around the globe, with 1,800+ to date.



Gen's SHIP program enables employees to make environmental home improvements, such as EV charging.

Our TERRA Community unites employees around environmental action. TERRA is committed to the small actions we can take every day – that together can save forests, conserve water, reduce air pollution and tackle climate change. TERRA has grown to more than 60 members who host educational events on topics including sustainable shopping, gifting and traveling and the science behind climate change and extreme weather events.

Our teams spearhead equipment recycling at Gen offices. If facilities are resized or closed, local teams gather and recycle IT hardware, office equipment and unused materials to help keep equipment out of landfills.

Additionally, in 2024, together with nonprofit [Sazime Stromy](#), our Brno employees helped plant an alley of trees benefitting the local community in Drnovice, Czech Republic.



Gen employees in Brno (Czech Republic) help plant trees in their local community.

Earth Month 2024

Gen team members across the world joined to celebrate Earth Month 2024, including weekly themed Earth Month missions and challenges in our Giving Hub, spotlights of our SHIP program participants and educational topics posted on our Team Channel and volunteer events.

Community partnerships

Partnerships with sustainability-focused nonprofits allow Gen to amplify our environmental efforts.

For the fourth consecutive year, Gen partnered with [Planet Water Foundation](#) on World Water Day to deliver clean drinking water to rural communities in India. Gen volunteers worked alongside Planet Water Foundation to construct a new AquaTower water filtration system at the Panchayat Union Middle School in Gummidipoondi, Chennai, a village of 2,000 people. The system can produce 1,000 liters of clean drinking water per hour and functions as a handwashing station for students, caregivers and family members. It will help keep 334 elementary and middle school children well enough to attend school and prevent illnesses in the school community and beyond.

Reporting

We continue to follow best practice in reporting openly and authentically on our environmental performance. Gen is tracking emissions information to comply with upcoming environmental reporting standards and frameworks as required. The Corporate Responsibility team also works closely with Internal Audit to identify and address gaps or risks in how we measure and verify our GHG emissions.

> For more, visit the [TCFD Index](#) at the end of this report.



Ethics & Governance

Accountability, transparency, respect and responsibility are embedded into the core of our business. We believe ethics belongs to everyone. And our experienced, independent and diverse Board helps us spot the opportunities to take our business to the next level.



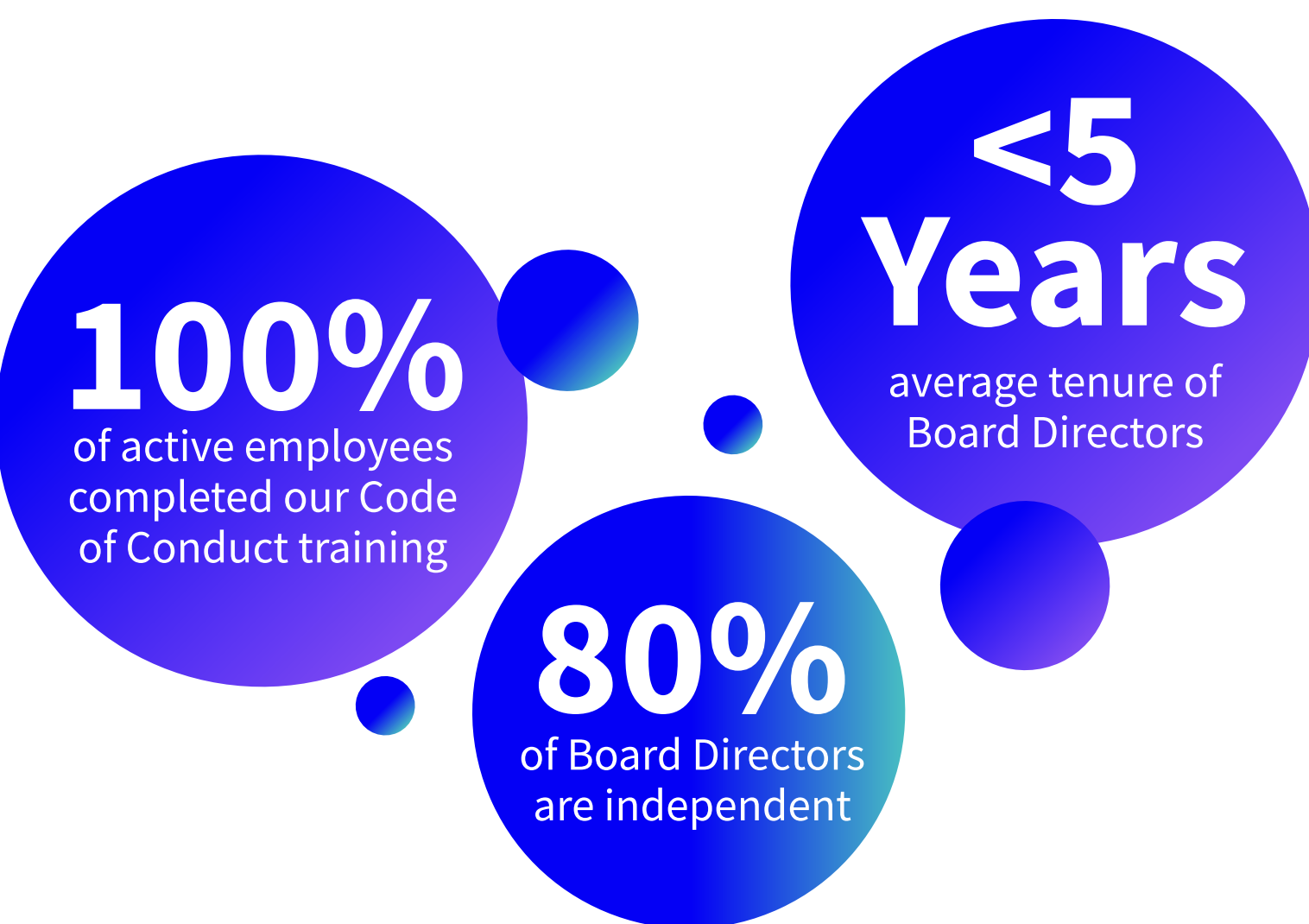
We believe ethics belongs to everyone.

Corporate governance

Open and honest communication is the key to good corporate governance. Our [Code of Conduct](#) and [Corporate Governance Guidelines](#) are publicly available on our website, as are our [political disclosure](#) and accountability, the composition of our [corporate committees](#), our [Company charters](#) and more.

We're delighted to be recognized once again as one of the most innovative Boards of Directors among S&P 500 companies.²³

> For more information on Gen's governance practices, please visit the following: [Board composition](#), [Board committees and experience](#), [Board oversight over ESG topics](#), [enterprise risk management](#), executive compensation and [tax strategy](#).



²³ 2023 recognition; awards announced in May following publication of this report.

Ethics

At Gen, we believe that ethical conduct is the responsibility of every team member. And it's our responsibility to give them the tools that set them up for success.

Our Head of Compliance reports on a quarterly basis to the Ethics & Compliance Steering Committee, comprised of senior leadership, as well as to the Audit Committee and the Technology and Cyber Subcommittee of the Board. In addition, the Board's Nominating and Governance Committee regularly reviews our Code of Conduct, recommending modifications as necessary. Ethics & Compliance also oversees the trade compliance, privacy legal, business continuity, subcrisis and operational compliance programs.

Compliance with the Code of Conduct, and with applicable laws, regulations and Gen policies, is mandatory. Our lock-out consequence cuts access to internal applications for those who do not complete the training by the deadline. We're pleased to report that 100% of active Gen team members completed annual Code of Conduct training in 2024. The training included modules on Conflicts of Interest, Bribery and Improper Payments, Accurate Books and Records, DEI and more. Other trainings we offer include:

- Security, Privacy by Design and role-specific Marketing and Trade Compliance
- Deep dives on ethics-related topics, such as Workplace Health and Safety, Insider Trading and more (every other year)
- Encouraging a harassment-free workplace and preventing sexual harassment (mandatory, bi-annually)



Gen's Mountain View, California (U.S.) office includes collaborative spaces for team members.

Our Code of Conduct guides how we operate as individuals and teams, including:

- Fair and honest business conduct
- Bribery and anti-corruption
- Conflicts of interest
- Raising ethical concerns
- Data and intellectual property protection
- Insider trading
- Workplace health and safety
- DEI
- Environmental sustainability
- Human rights
- Responsible sourcing
- Political actions and contributions

Available in English, Czech, French, German, Romanian and Japanese.

Anti-bribery and corruption

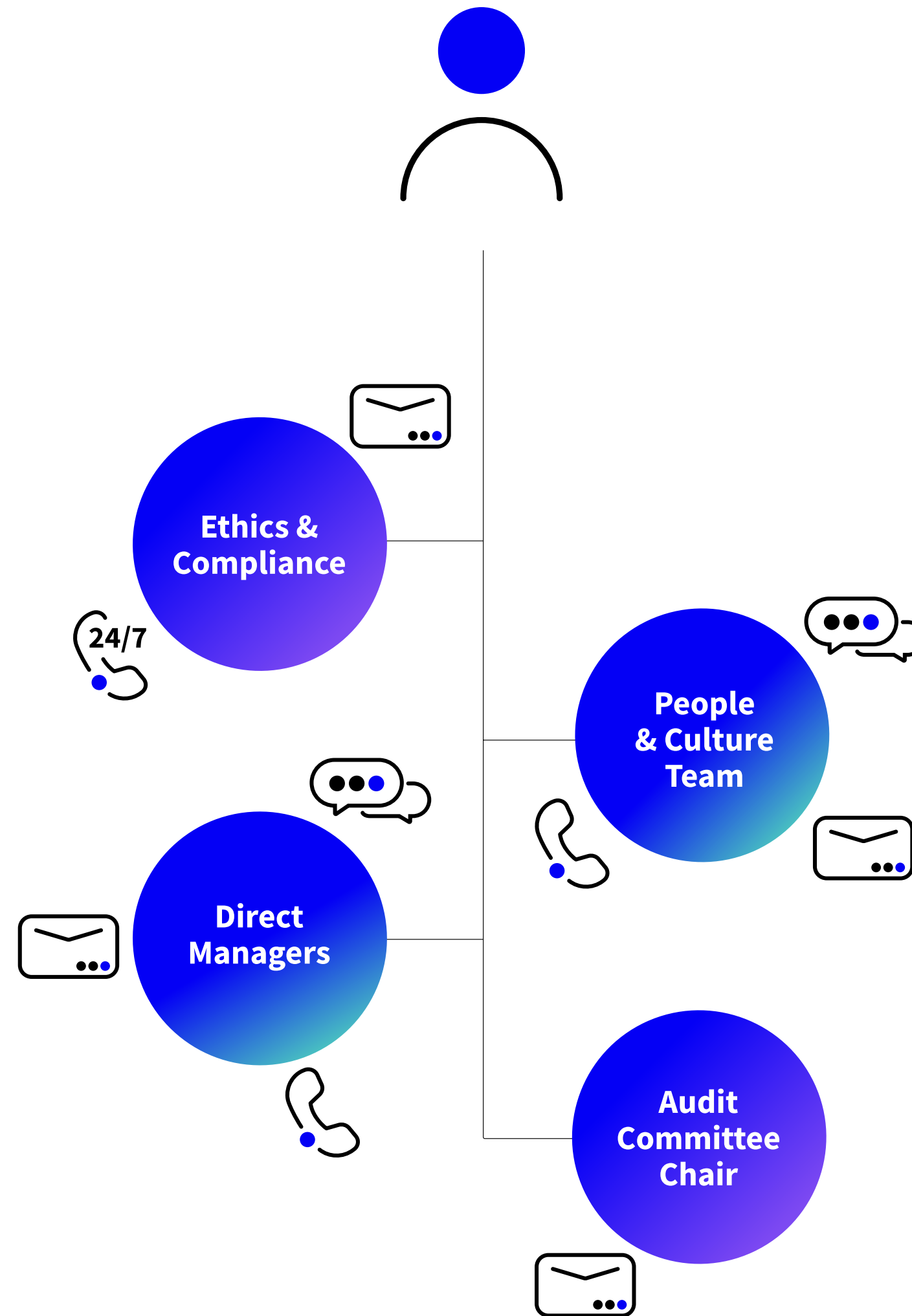
Our anti-bribery and corruption practices form a cornerstone of our Ethics & Compliance efforts. Our Internal Audit department conducts quarterly travel and expenses audits to review any payments that may implicate anti-corruption and business ethics. We require disclosure and pre-approval of any gifts of more than \$250, with even lower thresholds for international or government recipients. We screen all vendors and other third parties for compliance risks and operate a strict compliance mandate for our Marketing Development Fund.

Reporting unethical behavior

Employees have numerous channels through which they can raise concerns about business conduct. They can speak with, call or email their direct managers or the People & Culture team. They can also report to Ethics & Compliance directly through our anonymous [24/7 EthicsLine](#) hotline, also available on our website, or to the Ethics & Compliance email alias. Issues can also be reported to the Audit Committee chair directly through the email alias available on our public website. Familiarity with these mechanisms is part of Gen team members' annual Code of Conduct training. These resources are also available on [our website](#) to stakeholders other than employees, including shareholders, suppliers and community members.

Gen Central, our intranet, houses regularly updated resources, including an FAQ document about our investigation procedures. The Audit Committee of our Board of Directors, our internal Ethics & Compliance Steering Committee and our Head of Compliance have accountability and oversight of our mechanisms for reporting ethics violations and concerns, as well as our system's effectiveness.

Safeguarding trust



Human rights

Gen works to protect the human rights of all people throughout our value chain. Our [Human Rights Policy Statement](#), available in English, Spanish and Portuguese, builds on our commitment to uphold the 10 principles of the [United Nations Global Compact](#), and is aligned with the Universal Declaration of Human Rights. This commitment is enshrined in our Code of Conduct and [Global Supplier Code of Conduct](#). Our Directors, officers, employees, interns and contractors of Gen, as well as third parties acting on behalf of the Company, are expected to be aware of the implications of violating any aspect of our Code of Conduct and Global Supplier Code of Conduct.

We continue to support the “[United Nations Standards of Conduct or Business: Tackling Discrimination Against People Who Identify as LGBTI](#).” We screen all our suppliers for human rights alignment and efficiently track them through a digitized vendor platform. In 2024, 100% of our suppliers were considered “low risk” for human rights violations, based on our own review and supplier declaration.

We are proud to report zero human rights issues were again reported in 2024.

Ethical AI

As AI is accelerating a new wave of threats, we've become the leader in AI for consumer Cyber Safety. We commit to build and use AI tools with integrity, transparency and accountability.

AI-powered products such as Norton Genie pass the benefits of machine learning onto customers. Gen applies the same strong values and standards for privacy and security in deployment and use of AI as in every other area of the company. We offer trainings to our employees on the responsible development and use of AI. We continue to draw on the perspectives of multiple stakeholder groups to determine the role AI plays at Gen.

Who we're looking to for guidance in ethical AI:

- [National Institute of Standards and Technology \(NIST\) Risk Management framework for AI](#)
- [White House Executive Order on AI](#)
- [Information Technology Industry Council's \(ITI\) AI recommendations](#)
- [EU AI Act](#)
- [OCED AI Principles](#)

Additional tools for managing ethical risk include:

- Partner Code of Conduct²⁴
- Global Supplier Code of Conduct
- Global Procurement Policy
- Global Anti-Corruption and Bribery Policy (including anti-money laundering)²⁵
- Global Antitrust and Competition Policy
- Conflicts of Interest Policy
- Insider Trading Policy



²⁴ Applies to business partners involved in the distribution, resale or commercialization of our products and services, whether a direct or indirect partner.
²⁵ Outlines clear expectations and specific prohibitions, including the prohibition of facilitation payments.

Public policy and advocacy

The tech field is always changing. We want to help shape this change for the better.

With business and trade associations, we advocate for policy and legislation that helps protect consumers, spurs innovation and helps support the free flow of information worldwide. All affiliations are publicly disclosed.

We engage in public policy debates worldwide, and our experts are called upon to testify in front of the U.S. Congress, in Europe and around the globe. Our Public Policy team raises awareness and provides key data and insight to policymakers, their staff, media and through industry coalitions and like-minded organizations. We look to promote legislation that can truly accommodate the complexities of consumer Cyber Safety and security and promote a level playing field across the global marketplace. Gen does not maintain a political action committee or PAC.

Our Chief Legal Officer and the Government Affairs team are responsible for overseeing all of the Company's political engagements. Our Head of Corporate Responsibility and Public Policy leads these efforts on the ground. In 2024, we focused largely on Europe, due to our expanded presence in the region. Examples include:

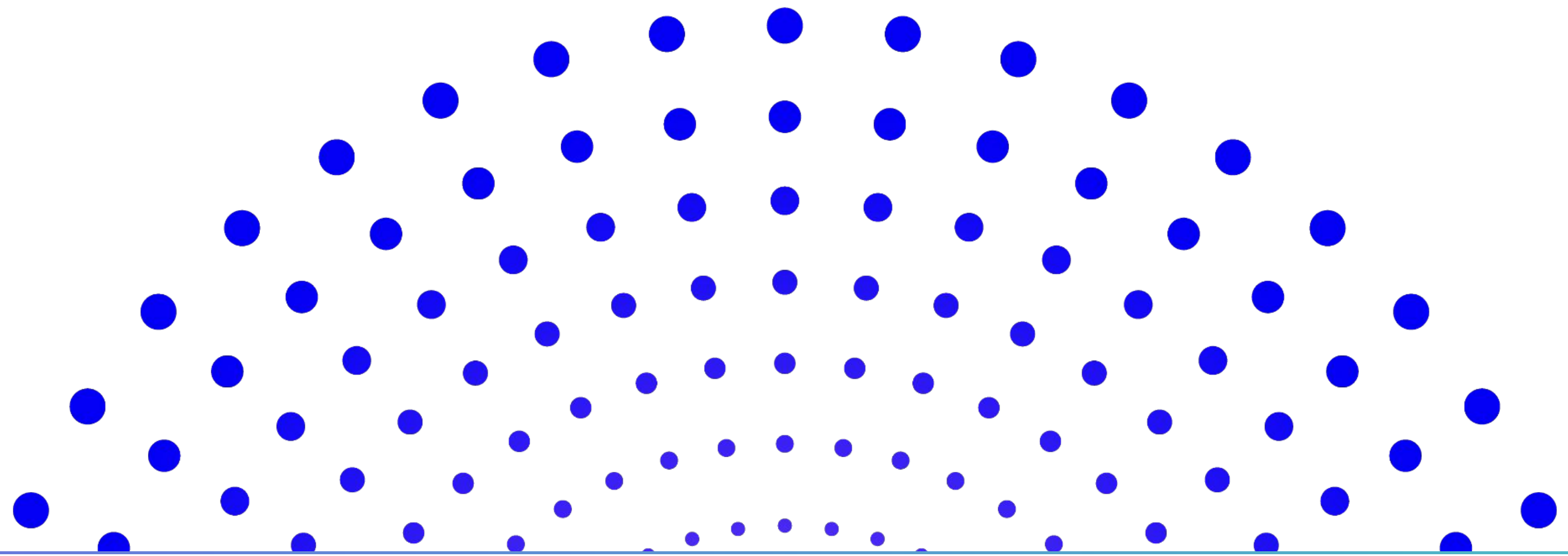
- Policy papers on the [Cyber Resilience Act](#) and digital identity issues through the eIDAS Regulation.
- Remained a [Founding Premiere Member](#) of the OpenWallet Foundation (OWF). Kim Allman, Head of Corporate Responsibility and Public Policy, spoke on behalf of OWF sharing Gen's insights on digital identity at the Federal Identity Conference.

- Continued to work with the [Trust Over IP Foundation](#) and the [Decentralized Identity Foundation](#), of which we are a Steering Member.
 - In the U.S. we submitted comments with the [Better Identity Coalition](#) to a Congressional Request for Input on solutions to reduce government improper payments.
 - We continue membership with the [Cyber Threat Alliance](#), a nonprofit working to improve global cybersecurity through near real-time cyber threat information sharing among companies and organizations. Through this partnership, we share research, intel and best practices in a trusted community with some of the world's most trusted cybersecurity companies.
- > Learn more about Gen's [political disclosure and accountability](#), including trade association affiliations and our positions on various public policy issues.

Stronger, together

We join other businesses, peers, nonprofits and industry thought leaders to accelerate our impact. We do not allow our membership dues to be used for political purposes.

We participate in the [Better Identity Coalition](#), [Coalition Against Stalkerware](#), [Silicon Valley Tax Directors Group](#) and the [Information Technology Industry Council \(ITI\)](#). We sit on and are a founding partner of the [Identity Theft Resource Center's \(ITRC\)](#) initiative to provide identity education and protection programs and culturally competent victim services to support Black communities.





About this report

We have developed our 2024 Social Impact Report using the Sustainable Accounting Standards Board (SASB) Standards, now part of the IFRS Foundation, for the Software & Information Technology Services industry. We also align our reporting to the Global Reporting Initiative (GRI) Sustainability Reporting Standards and to the Task Force on Climate-Related Financial Disclosures (TCFD). Apex Companies LLC is providing limited assurance under the ISO 14064-3 standard of our 2024 global Scope 1 and 2 emissions and select Scope 3 emissions.

Any references to “material” or “materiality” in this report are not intended to have the same meaning as in the context of financial statements or financial reporting or as defined by the securities laws of the United States.

This report also contains human capital measures or objectives that may be different from or are in addition to the human capital measures or objectives that the Company is required to disclose in its U.S. Securities and Exchange Commission (“SEC”) filings. For a discussion on human capital measures or objectives that we focus on in managing its business, please see the “Human Capital” section in the Company’s most recent Annual Report on Form 10-K.

While we believe that our social impact and ESG initiatives are important to operating in a sustainable manner, we do not believe that such initiatives are material to our financial results and results of operations. For a discussion of the risks that we believe could materially affect our financial results and results of operations, please see the “Risk Factors” section in the Company’s annual report on Form 10-K and quarterly reports on Form 10-Q filed with the SEC. “Gen,” “we,” “us,” “our” and “the Company” refer to Gen Digital Inc. and all its subsidiaries. The report covers the Company’s activities during the 2024 fiscal year, between April 1, 2023 and March 31, 2024. References to 2024 throughout the report refer to Gen’s fiscal year, unless otherwise noted. We have also included relevant examples of impact that occurred in calendar year 2024. The activities, performance and data detailed in the report relate to Gen Digital Inc.’s worldwide operations, unless otherwise stated.

To maintain consistency, we refer to Gen throughout this report by its present name, even with regard to events that took place prior to our name change. Brand-specific initiatives and data are noted throughout. The NortonLifeLock Foundation name has been changed to the Gen Foundation post-merger (November 28, 2022). Where we refer to philanthropic giving (grants and corporate giving) these were conducted by the NortonLifeLock Foundation pre-merger and the Gen Foundation post-merger.

Certain statements in this report constitute “forward-looking statements.” Forward-looking statements in this report are made pursuant to the safe harbor provisions of Section 21E of the Securities Exchange Act of 1934 and other federal securities laws. These statements are based on management’s current opinions, expectations, beliefs, plans, objectives, assumptions or projections regarding future events or results, including, but not limited to, our social impact and ESG commitments, strategies and initiatives; our business plans and strategy; our technology and services; our opportunities for growth; and our stakeholder engagement efforts.

These forward-looking statements are only predictions, not historical fact and involve certain risks and uncertainties, as well as assumptions. Actual results, levels of activity, performance, achievements and events could materially differ from those stated, anticipated or implied by such forward-looking statements. While Gen believes that its assumptions are reasonable, there are many risks and uncertainties that could cause actual results to materially differ from forward-looking statements, including the risks discussed under the heading “Management’s Discussion and Analysis of Financial Condition and Results of Operations” and “Risk Factors” in the Company’s annual report on Form 10-K and quarterly reports on Form 10-Q filed with the SEC, as well as other factors described in our filings with the SEC. We undertake no obligation to update or revise any forward-looking statement contained in this report, except as otherwise required by law.

We welcome your questions about this report and Social Impact at Gen via Giving@GenDigital.com.

Gender diversity

	FY22				FY23				FY24			
	Total	Women	Men	Not Declared	Total	Women	Men	Not Declared	Total	Women	Men	Not Declared
Global gender diversity												
Workforce		33%	67%	<1%	3890	32%	67%	<1%	3601	34%	66%	<1%
Leadership ²⁶		33%	66%	<1%	308	30%	70%	0%	277	34%	66%	0%
Technical	NR ²⁷	NR	NR	NR	2292	20%	80%	<1%	2060	22%	78%	<1%
Non technical	NR	NR	NR	NR	1598	50%	49%	<1%	1541	50%	49%	<1%
Workforce by region												
Americas	1,251	40%	59%	<1%	1,269	39%	61%	1%	1,134	42%	57%	<1%
Asia Pacific, Japan (APJ)	92	34%	63%	3%	106	33%	67%	0%	106	33%	67%	0%
Europe, Middle East, and Africa (EMEA)	656	30%	67%	3%	1,881	31%	69%	0%	1,710	32%	68%	<1%
India	689	22%	78%	0%	634	24%	76%	0%	651	26%	74%	0%

> For financial data, please review our [10-K](#), which can be found on the investor relations page of our website.

²⁶ Leadership includes Director and above.

²⁷ Not recorded.

Gender diversity

	FY22				FY23				FY24			
	Total	Women	Men	Not Declared	Total	Women	Men	Not Declared	Total	Women	Men	Not Declared
Employee category												
Executive (VP or above)	23	35%	61%	4%	50	28%	72%	0%	51	29%	71%	0%
Manager (non-executive)	1,103	29%	71%	<1%	1,158	26%	74%	0%	1,117	28%	72%	0%
Individual contributor (non-executive)	1,562	36%	63%	1%	2,682	35%	64%	0%	2,433	37%	63%	0%
Board of Directors												
Board of Directors	9	44%	56%	0%	10	40%	60%	0%	10	40%	60%	0%

U.S. racial and ethnic diversity

	FY22	FY23	FY24
U.S. race / ethnicity total (%)			
Underrepresented racial/ethnic groups	17%	15%	17%
Non-underrepresented racial/ethnic groups	82%	66%	68%
Asian	34%	28%	29%
Black	7%	6%	7%
Hispanic	6%	6%	6%
White	45%	38%	39%
Indigenous or native	<1%	<1%	<1%
Two or more	4%	3%	3%
Not declared	4%	4%	3%
Unknown	-	16%	12%

> Please visit [our website](#) for our most recent U.S. EEO-1 Component 1 Data Collection Report.

U.S. racial and ethnic diversity

	FY22	FY23	FY24
U.S. leadership (%)			
Underrepresented racial/ethnic groups	12%	9%	12%
Non-underrepresented racial/ethnic groups	85%	72%	70%
Not declared	3%	3%	2%
Unknown	0%	16%	16%

> Please visit [our website](#) for our most recent U.S. EEO-1 Component 1 Data Collection Report.

Age composition of employees

FY24			
Age	<30	30-50	>50
Percentage of employees	16%	73%	11%

> Please visit [our website](#) for our most recent U.S. EEO-1 Component 1 Data Collection Report.

Environment

	FY22	FY23	FY24
GHG emissions (metric tons of CO2e)²⁸			
Total Scope 1 and 2 market-based	11,353	15,422	12,006
Scope 1 (natural gas, diesel, propane, refrigerants, gasoline)	1,062	964	423
Scope 2 market-based (purchased electricity and heating)	10,291	14,458	11,583
Scope 2 location-based (purchased electricity and heating)	11,524	13,681	12,075
Scope 3	70,731	92,137	86,148
Upstream	69,168	90,693	85,925
Downstream ²⁹	1,562	1,443	223
Emissions Intensity (per \$1 million USD revenue)			
Scope 1 and 2 market-based	4.1	4.6	3.1
Scope 1	0.4	0.29	0.1
Scope 2 market-based	3.7	4.3	3.0
Scope 3	25	28	22

²⁸ GHG inventory was verified by a third-party.

²⁹ The downstream categories were calculated via a life cycle analysis of physical products in FY22. This LCA was not reproduced in FY24.

Environment

	FY22	FY23	FY24
Energy Consumption (gigajoules)			
Total energy consumption Scope 1 and 2	139,474	168,322	107,915
Scope 1 (natural gas, diesel, propane, refrigerants, gasoline, onsite solar)	18,066	18,246	48,095 ³⁰
Scope 2 market-based (purchased electricity and heating)	121,408	150,076	215,127
Energy intensity (all scopes per million dollars of revenue)	50	28	25.7
Total electricity consumption from renewable sources (GJ)	32,913	33,080	29,351
Total electricity consumption from renewable sources (%) ³¹	27%	22%	40%

³⁰ This number is reported in MWH.

³¹ Includes renewable energy included in the power mix delivered by our utility suppliers, where information is available. Excludes renewables in the average/regional grid electricity.

Environment

	FY22	FY23	FY24
Waste (metric tons)			
Total waste	3,999	4,389	916
Waste sent to landfill	335	639	400
Waste recycled	2,835	3,359	78
Waste composted	229	391	438
Waste diversion rate (%)	90%	85%	85%
Water			
Water withdrawals (cubic meters)	204,629	206,910	223,368
Water withdrawals from water stressed regions (%)	25%	27%	35%
Environmental Fines			
Number of environmental fines	0	0	0
Amount of environmental fines	0	0	0

Philanthropic Giving

	FY22	FY23	FY24
Philanthropic Giving (\$USD)			
Total giving ³²	\$4,667,108	\$5,386,813	\$6,371,944
Grants	\$2,674,899	\$2,818,121	\$2,954,608
Matching gifts, Dollars for Doers	\$389,759	\$564,074	\$519,865
Retail value of software donations (TechSoup)	\$1,602,450	\$1,642,280	\$1,615,811
Organizations that received software donations (#)	9,331	9,214	9,778
Employee Contribution			
Employee giving (\$USD)	\$254,717	\$201,378	\$221,233
Volunteer hours (#)	3,583	4,752	6,160
Employee participation rate in volunteering and giving program (%)	42%	33% ³³	55%

³² Includes financial investments, retail value of software, hardware donations and employee matching programs.

³³ Fourteen percent of our grant funding was dedicated to causes supporting nonprofits and initiatives that focus specifically on DEI. We also embed DEI components across our grant funding. As examples, our Cyber Safety partnership with WAGGGS reaches girls and young women and our environmental partnership with GRID Alternatives reaches Tribal communities. In 2024, 81% of grants across all Priority Focus Areas had DEI components embedded.

Grants by Priority Focus Area

	FY22	FY23	FY24
Cyber Safety education and training	56%	54.4%	63%
Community impact and disaster response	9%	28%	30.9%
Diversity, equality and inclusion	21%	14%	5.4%
Environment	14%	3.6%	0.8%

Sustainability Accounting Standards Board (SASB) Index

The Sustainability Accounting Standards Board ([SASB](#)) Standards, now part of the International Financial Reporting Standards (IFRS) Foundation, provides industry-specific standards to guide the disclosure of sustainability information by companies to their investors. The following Index maps our disclosures to the Software & IT Services Sustainability Accounting Standard.

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	(1) 17,756 MWH (2) 100% (3) 40%	TC-SI-130a.1
Environmental Footprint of Hardware Infrastructure	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	(1) Not available (2) Not available We do not own or operate any data centers. We currently do not receive water usage data from our collocated data center vendors.	TC-SI-130a.2
Environmental Footprint of Hardware Infrastructure	Discussion of the integration of environmental considerations into strategic planning for data center needs	We are a cloud-first Company with limited managed data center operations (i.e., data centers we own or collocate), reducing our inherent risks related to energy consumption and greenhouse gas emissions as well as our risks from physical climate changes. Environmental Policy Statement Environment, p. 38-39	TC-SI-130a.3

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
Data Privacy & Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	<p>This is outlined in our public-facing privacy notices (below). Just in time notice is provided with respect to websites using a cookie banner.</p> <p>For comprehensive disclosures regarding the processing of user information, please visit: Data Privacy & Protection, p. 32 Gen Privacy Statements Norton LifeLock Product and Services Privacy Notices</p>	TC-SI-220a.1
Data Privacy & Freedom of Expression	Number of users whose information is used for secondary purposes	We use selected categories of data to improve Gen’s products or service offerings, unless the customer has opted-out from such usage via product settings (where available). Gen also has approximately 140 million users of free ad-supported products. Outside of these ad-supported products, Gen does not provide data to third parties for use for their own commercial purposes.	TC-SI-220a.2
Data Privacy & Freedom of Expression	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Avast reached a settlement with the Federal Trade Commission (FTC), including a payment of \$16.5M USD, to resolve its investigation of Avast’s past provision of customer data to its subsidiary, Jumpshot, that we voluntarily closed over four years ago, in January 2020. While we disagree with the FTC’s allegations and characterization of the facts, we stand behind the decision to resolve the matter with this settlement and move forward.	TC-SI-220a.3
Data Privacy & Freedom of Expression	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	(1) 123 (2) 123 (3) 29% Gen only provides user data to law enforcement when compelled to do so, for example after being served with a subpoena or other judicial order requiring production of data.	TC-SI-220a.4

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
Data Privacy & Freedom of Expression	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Gen does not allow any monitoring or censoring in our products. We do not provide any goods or services to the US-embargoed countries: Cuba, Iran, North Korea, Crimea, Donetsk and Luhansk regions of Ukraine and Syria. Due to the ongoing conflict in Ukraine and related government regulations, we also do not provide any goods or services in Russia or Belarus.	TC-SI-220a.5
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	(1), (2), (3) While Gen tracks data breaches and provides required notifications, we do not share this information outside of the organization except where required. Gen has both security and privacy incident response playbooks, which cover the procedures for responding to suspected and actual data breaches, including post-incident remediation and reporting. Gen follows regional regulations for disclosing data breaches to affected users and to the relevant regulatory authorities.	TC-SI-230a.1

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
Recruiting & Managing a Global, Diverse & Skilled Workforce	Employee engagement as a percentage	Our People, p. 30 +7 eNPS; 74% favorability; 83% participation (One-Year-In survey)	TC-SI-330a.2
Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	(1) Women in leadership (Global): 34%; Underrepresented minorities in Leadership (U.S.): 12% (2) Women in technical roles: 22% (3) Women in workforce (Global): 34%; Underrepresented Minorities in Workforce (U.S.): 17%	TC-SI-330a.3
Intellectual Property Protection & Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	None	TC-SI-520a.1
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	(1) 0 performance issues (2) 1 service disruptions (3) 1 hours 15 minutes total customer downtime	TC-SI-550a.1

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of employees that are (1) foreign nationals, and (2) located offshore	(1) 9% of employees are foreign nationals (2) 43% of employees are located offshore from the entity's country of domicile	TC-SI-330a.1
Data Security	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	<p>Global Cyber Security performs monthly vulnerability scans of its infrastructure and granularly tracks the status of vulnerabilities through the vulnerability management life cycle, as described in the Vulnerability and Patch Management Standard.</p> <p>The majority of our infrastructure have vulnerability agents deployed to provide more timely detection of vulnerabilities.</p> <p>Vulnerabilities are tracked in accordance throughout the following life cycle:</p> <ul style="list-style-type: none"> - Vulnerability Identification - Vulnerabilities are discovered through various means including, but not limited to, reputable third-party sources (threat intelligence, vendor bulletins, etc.), vulnerability scans, vulnerability management agent and penetration tests. - Vulnerability Prioritization - Vulnerabilities discovered are assigned a criticality that leverages the industry CVSS score. The criticality assigned to each vulnerability defines the remediation SLAs. - Vulnerability Remediation - Vulnerabilities are remediated through patching, configuration changes, removing default credentials, etc. In the event that vulnerabilities are unable to be addressed within defined SLAs, a formal risk exception is required to be documented. Exceptions are reviewed at least annually or more frequently. - Metrics - Granular vulnerability metrics are maintained and shared with Executive Leadership for visibility. <p>All of Gen's Information Security Policies and Standards are based on industry guidelines, specifically ISO-27001:2013 and Payment Card Industry Data Security Standards (PCI-DSS).</p>	TC-SI-230a.2

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
Managing Systemic Risks from Technology Disruptions	Description of business continuity risks related to disruptions of operations	<p>2024 Annual Report</p> <p>The Audit Committee of the Board of Directors reviews Gen’s business continuity and disaster preparedness planning. Gen's risk management program includes the people, processes and technologies designed to create and preserve value for shareholders. Risk management practices are aligned with the Company's vision, mission, strategies and objectives. Accordingly, our risk management practices consider the risks related to disruptions of operations. Gen's risk assessment methodology includes the identification and evaluation of the likelihood of an event occurring, the impact (potential loss) and the speed of onset (timeframe) of the event. The impact of the event can be categorized in financial, operational, legal and regulatory, reputational and health and safety. Business continuity plans document strategies that include strategies for loss for workplace, workforce, vendor/ third-party and IT. Strategies are in place for each of the referenced scenarios to help protect critical business processes in the event of any disruption. Examples of redundant business processes would include transferring workload to a partner or relocating staff to work from home depending on the scenario and the impacted processes. Geographical separation of redundant services exists where possible to mitigate natural disasters and other events out of the control of the Company. Software development life cycle practices are in place to mitigate and roll back problematic changes to our applications that may introduce programming errors. Operations are owned and not outsourced. Critical business operations are hosted with AWS or Azure. Back off services still exist on-premise.</p>	TC-SI-550a.2

Topic	Accounting / Activity Metric(s)	Location/Response	SASB Code
	(1) Number of licenses or subscriptions, (2) percentage cloud-based	(1) 173 licenses (2) 38% cloud-based	TC-SI-000.A
	(1) Data processing capacity, (2) percentage outsourced	(1) 15,058 nodes (2) 8%	TC-SI-000.B
	(1) Amount of data storage, (2) percentage outsourced	(1) 251.26 PB (2) 69%	TC-SI-000.C

Global Reporting Initiative (GRI) Index

[GRI's](#) standards provide a set of voluntary indicators on the economic, environmental and governance impacts of a Company's performance. The index below applies guidance from the GRI Universal Standards 2021. We have also provided a cross reference to the United Nations Global Compact (UNGC) where applicable.

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-1	Organizational Details	<ul style="list-style-type: none"> a. Gen Digital Inc. b. Publicly Traded C-Corporation 2023 10-K, p. 5 c. 60 E Rio Salado Pkwy STE 1000 Tempe, AZ 85281 d. GenDigital.com 	
2-2	Entities included in the organization's sustainability reporting	<ul style="list-style-type: none"> a. 2024 10-K 	
2-3	Reporting period, frequency and contact point	<ul style="list-style-type: none"> a. About this Report, p. 48 b. Fiscal Year 2024: March 2023-April 2024 c. Annual d. Kim.Allman@gendigital.com 	
2-4	Restatements of information	<p>June 1, 2024</p> <p>We are doing our part to help protect the planet by operating a low carbon business and enabling our employees to take an active role in caring for the environment. We're inspired by the opportunity to do more together, so we support wider community efforts to accelerate our impact.</p>	
2-5	External assurance	<ul style="list-style-type: none"> a. Our GHG scope 1, 2 and partially 3 are audited by an external party. The report is approved by legal and the chair of the nominating committee and CEO. b. Apex Companies LLC is providing limited assurance under the ISO 14064-3 standard of our 2023 global Scope 1 and 2 emissions and select Scope 3 emissions. 	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-6	Activities, value chain and other business relationships	<p>a. 2024 10-K, p. 5 b. Company profile 2024 10-K, p. 5-11 Environment, p. 38 Global Supplier Code of Conduct Corporate Responsibility Policies</p> <p>Gen outsources manufacturing of our physical products. Products are manufactured from Prague in Czech Republic and Singapore. We have two main suppliers, both of which are under contract and required to abide by our Supplier Code of Conduct. The main products sourced are board/paper designed products containing a digital code key.</p> <p>c. 10-K, p. 5-9 d. About this Report, p. 47</p>	Human Rights, Labour, Environment: Relevant policies, procedures, activities
2-7	Employees	<p>a. 3,601 total employees; Data Tables, p. 48-52 b. 2024 10-K, p. 9-10 Data Tables, p. 48-52 Human Capital Management, p. 27 Direct reporting on employee data as obtained by our human capital management software.</p> <p>c. Direct reporting on employee data as obtained by our human capital management software.</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-9	Governance structure and composition	<p>a. Our Approach, p. 5 Governance Documents Charter of the Nominating and Governance Committee of the Board of Directors Corporate Governance</p> <p>b. 2023 Proxy, p. 17</p> <p>c. 2023 Proxy</p> <p>Proxy summary, p. 2 Director Overboarding Limits, p. 11 Director bios, p. 26-33 The Board and its Committees, p. 17 Board Diversity Matrix, pg. 33</p> <p>Committees consist of all independent and non-executive members. 20% are executive directors and the other 80% are independent, non-executive directors.</p> <p>No members of the board have been elected via stockholder proposal or stockholder nomination, as permitted by the Company's governing documents. However, all directors are elected annually by a vote of the stockholders.</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-10	Nomination and selection of the highest governance body	2023 Proxy, p. 22-24	
2-11	Chair of the highest governance body	The chairperson is non-executive and independent. 2023 Proxy, p. 2	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-12	Role of the highest governance body in overseeing the management of impacts	<p>Social impact website</p> <p>The Gen Leadership Team is highly engaged in our social impact efforts. Our Head of Corporate Responsibility and Public Policy provides regular updates to the Chief Marketing Officer and CEO on social impact activities. She also meets quarterly with our Leadership Team and cross-functional environmental, social and governance (ESG) Working Group to review our strategy, progress and program updates.</p> <p>The Nominating and Governance Committee of our Board of Directors has oversight of the Company’s corporate responsibility and ESG strategy, and our full Board of Directors receives a quarterly update on our strategy and progress. This quarterly update includes performance data and program information across ethics, community investment and environment; progress made toward our social impact targets; and information on emerging ESG topics. The Nominating and Governance and Compensation and Leadership Development Committees of our Board of Directors provide oversight and are actively engaged in our DEI strategy. Additionally, we hold regular meetings with functional leaders on our People & Culture, Brand & Marketing, DEI, Global Health & Wellness, Product and Supply Chain teams to collaborate and coordinate efforts.</p> <p>Building a brand centered on trust is critically important, and our focus on ESG helps us earn trust from customers, employees, investors and shareholders. As such, ESG topics are important to our business strategy:</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
		<ul style="list-style-type: none"> • Environment: Protecting our planet is fundamental to ensuring a safe and sustainable future. We work to reduce GHG emissions from our operations through operational efficiencies, reduce the environmental footprint of our products across their lifecycle through innovative approaches to product development and packaging, promote high standards for environmental stewardship in our supply chain and engage with employees and environmental partners to amplify our work. • Social: We are proud to support the communities where our team members live and work. Our community impact programs include employee volunteering and giving, product donations, signature programs that leverage our unique expertise in increasing digital safety literacy, and corporate philanthropic giving focused on digital safety education; environmental action; and disaster response. We also support DEI and employee engagement. In fiscal 2023, we publicly disclosed our most recent US Equal Employment Opportunity Commission EEO-1 Component 1 Data Collection Report on our investor relations website. • Governance: Governance covers many core operating principles overseen by the Nominating and Governance Committee of our Board. We believe that our global culture of responsibility, and the positive contributions we make to the customers, employees, communities and other stakeholders that we serve drives value for our business. 	
2-13	Delegation of responsibility for managing impacts	See ESG strategy above	
2-14	Role of the highest governance body in sustainability reporting	See ESG strategy above	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-15	Conflicts of interest	<ul style="list-style-type: none"> i. We disclose in the proxy all other public company boards that each director participates in and provide the required disclosure for Compensation Committee Interlocks and Insider Participation under the Exchange Act. ii. We do not have and therefore do not publicly disclose cross-shareholding with suppliers and other stakeholders. iii. Controlling shareholders would be required to report their ownership of Gen securities on Form 4s, which would be found on the Company's insider transactions page on the SEC website. Additionally, we would disclose controlling stockholders within our beneficial ownership table in the proxy for all owners over 5%. iv. We disclose Certain Related Party Transactions (including the parties, their relationships and any transaction amounts over \$120K) within the proxy in accordance with the Exchange Act requirements. 	
2-16	Communication of critical concerns	See 2023 Proxy, p. 13-14 for a discussion of the board's role in risk oversight, the board's role in oversight of company strategy, information security and risk oversight and the board's role in oversight of human capital management.	
2-17	Collective knowledge of the highest governance body	See ESG strategy above.	
2-18	Evaluation of the performance of the highest governance body	2023 Proxy, p. 12	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-19	Remuneration policies	<p>2023 Proxy</p> <p>Executive Compensation Program, p. 4 Director compensation, p. 33-36 Fiscal Year 2023 Director Compensation Changes, p. 34 Executive compensation and related information, p. 49, 53, 54 Key Compensation and Governance Policies, p. 68 Severance and Change of Control Benefits, p. 68 Potential Payments Upon Termination or Change-in-Control, p. 79, 81-83</p> <p>a-ii. Compensation Committee Decision Process, p. 70 There are no sign-on bonuses or recruitment incentive payments for board members.</p> <p>a-v. No retirement benefits for board members.</p> <p>b. The majority of pay for our CEO and other NEOs is at risk and/or performance based. Our short-term incentive compensation is linked directly to our financial results and may be modified by performance against certain DEI metrics. A significant portion of our long-term incentive compensation is linked directly to multi-year financial results and relative TSR.</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-20	Process to determine remuneration	<p>2023 Proxy</p> <p>Executive compensation and related information, p. 49 Say-On-Pay and Stockholder Engagement, p. 52 Role and Independence of Compensation Consultant, p. 71</p> <p>a. i. Our Compensation Committee designed our FY23 compensation program to be consistent with leading corporate governance and executive compensation practices and is also responsible for reviewing and making recommendations to the Board regarding company policies on recoupment of incentive-based compensation.</p> <p>At our 2022 Annual Meeting of Stockholders, the vote on the fiscal year 2022 (FY22) compensation of our NEOs passed with approximately 89% of the votes cast (excluding abstentions).</p> <p>In addition to our annual “say-on-pay” vote, we are committed to ongoing engagement with our stockholders to gain valuable insight into the issues that matter most to them and to enable Gen to address them effectively. We routinely interact and communicate with stockholders through a number of forums, including through quarterly earnings presentations, SEC filings (including the Annual Report and Proxy Statement), the Annual Meeting, and investor meetings and conferences. During 2022, we reached out to all of our top 20 stockholders, and ultimately engaged with 14 stockholders, who represented in the aggregate over 42% of our outstanding capital stock. In these meetings, we discussed matters such as Gen’s prospects, business model, corporate governance, and executive compensation programs, plan design, and goal setting. Following these meetings, we shared stockholder feedback and trends and developments about corporate governance matters with our Board.</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
		<p>Following such discussions and after considering the voting preferences of our stockholders, we determined it to be appropriate for the FY23 compensation program to maintain many of the same elements as our FY22 compensation program, except: (i) our FY23 executive annual incentive plan included a modifier based on DEI metrics, (ii) our CEO and President both received VCP equity grants on the same terms as those previously made to our other NEOs during FY22 except for the inclusion of an additional stretch goal and that the entirety of their VCP awards were performance- based with no RSUs awarded, and (iii) our President received certain equity grants in connection with his appointment as President and his considerable equity investment in Gen and agreed to not sell any shares of Gen common stock held by him and his foundation for a three-year period, as described in more detail below. At Gen, we have an open line of communication with our stockholders and investors and continue to engage them for feedback on our programs.</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
		<p>b. Shareholders voted and overwhelming approved the following proposals:</p> <p>(A) Advisory vote to approve the Company’s executive compensation;</p> <p>Votes For 502,017,650 Votes Against 44,827,675 Abstentions 737,969 Broker Non-Votes 30,051,112</p> <p>(B) Advisory vote on the frequency of advisory votes to approve the Company’s executive compensation.</p> <p>One Year 541,640,650 Two Years 651,754 Three Years 4,826,890 Abstentions 464,000 Broker Non- Votes 30,051,112</p> <p>Shareholders voted and overwhelming rejected the following shareholder proposal:</p> <p>(A) Stockholder proposal regarding shareholder ratification of termination pay.</p> <p>Votes For 45,211,651 Votes Against 501,708,154 Abstentions 663,489 Broker Non-Votes 30,051,112</p>	
2-21	Annual total compensation ratio	<p>2023 Annual Report, p. 46-69</p> <p>a. The fiscal year 2023 annual total compensation of our median employee (other than our CEO) was \$96,500.</p> <p>b. Based on this information, the pay ratio of the annual total compensation of our CEO to the median of the annual total compensation of our employees is 262.1 to 1.</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-22	Statement on sustainable development strategy	Messages From the Chief Executive Officer and Board Member, p. 3- 4 Approach, p. 12	CEO statement including continued support of the United Nations Global Compact
2-23	Nomination and selection of the highest governance body	<p>a. Many of our policies cover responsible business conduct, including our Code of Conduct</p> <p>b. Human Rights Policy</p> <p>c. Our Code of Conduct and other publicly available policies are found here: https://www.nortonlifelock.com/us/en/legal/.</p> <p>d, e. Our Code of Conduct is reviewed and approved by VPs of each business unit and applies to all the organization's activities.</p> <p>f. Workers are made aware of the policies at onboarding and through annual trainings on the policies.</p>	Human Rights, Labour, Environment, Anti-Corruption: Relevant policies, procedures, activities
2-24	Embedding policy commitment	All employees are expected to act in line with the Code of Conduct and other relevant policies, which is enforced through trainings.	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-25	Processes to remediate negative impacts	<ul style="list-style-type: none"> a. Our Code of Conduct provides that all employees will be subject to the same remediation measures for policy violations. The Company has adhered to this. b. We have an anonymous reporting channel for internal Gen employees and external reports. Employees can also report concerns to P&C or to their manager. c. Ethics and Compliance provides a recommendation based on the findings of the investigation conducted after the concern is reported in line with the Code of Conduct. P&C and the manager of the subject implement the recommendation. d. Ethics and Compliance has an email inbox and other mechanisms for employees and others to raise issues with the reporting mechanisms if needed. e. Through our reporting tool, EthicsPoint, we track all reports and remediation steps to determine effectiveness. 	
2-26	Mechanisms for seeking advice and raising concerns	<ul style="list-style-type: none"> a-i. Individuals can reach out to their manager, P&C, or Ethics and Compliance for guidance. a-ii. We have an anonymous reporting channel for internal Gen employees and external reports. Employees can also report concerns to P&C or to their manager 	
2-27	Compliance with laws and regulations	<ul style="list-style-type: none"> a-i. None a-ii. None b-i. None c-ii. None d. n/a 	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
2-28	Membership associations	ITI, Better Identity Coalition, Stalkerware Coalition, Open Wallet Foundation, Cyber Threat Alliance	Human Rights, Labour, Environment: Relevant policies, procedures, activities
2-29	Approach to stakeholder engagement	<p>Stakeholder engagement</p> <p>Gen engages with various stakeholders on an ongoing basis, we check that our stakeholders are aligned to our corporate responsibility goals, objectives, and strategy. We undertake extensive engagement across our different stakeholders, from formal surveys of employees and customers to more informal discussions and partnerships with our communities. The frequency and nature of the engagement depends on a variety of factors, including the nature of the relationship and the preferences of our stakeholders. A variety of stakeholder opinions are solicited to support the assessment of significant topic areas in the Social Impact report including advocacy groups, employees, thought leaders and topic area experts.</p>	
2-30	Collective bargaining agreements	<p>a. 4%</p> <p>b. For employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations.</p>	<p>Labour: Relevant policies, procedures, activities</p> <p>Labour: Measurement of outcomes</p>
3-1	Process to determine material topics	<p>Approach, p. 10</p> <p>About this report, p. 47</p>	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
3-2	List of material topics	Approach, p. 10 About this report, p. 47	
3-3	Management of material topics	See individual indicators and topic areas throughout the report for management practices. Stakeholder engagement	

GRI Material Topic	GRI Management Approach Cross-reference	Relevant External Entities FY24	UNGC Cross-reference
Economic			
GRI 201: Economic Performance	2024 10-K, p. 5, p. 39	Communities; Customers; Governments and regulators; Investors; Suppliers	
GRI 205: Anti-corruption	Ethics & Governance, p. 43 Code of Conduct Conflict Minerals Policy		Anti-corruption: Relevant policies, procedures, activities
Environmental			
GRI 302: Energy	Environment, p. 38 Environmental Policy Statement	Communities; Customers; Governments and regulators; Investors; Suppliers	Environment: Relevant policies, procedures, activities
GRI 305: Emissions	Environment, p. 38-39 Data Tables, p. 53 Environmental Policy Statement	Communities; Customers; Governments and regulators; Investors; Suppliers	Anti-corruption: Relevant policies, procedures, activities
Social			
GRI 401: Employment	Code of Conduct Human Rights Policy Human Rights, p. 44		Human Rights: Relevant policies, procedures, activities Labour: Relevant policies, procedures, activities
GRI 404: Training and Education	Our People, p. 29		Labour: Relevant policies, procedures, activities



GRI Material Topic	GRI Management Approach Cross-reference	Relevant External Entities FY24	UNGC Cross-reference
Social			
GRI 405: Diversity and Equal Opportunity	Diversity, Equity & Inclusion, p. 23 Human Rights Policy		Human Rights: Relevant policies, procedures, activities Labour: Relevant policies, procedures, activities
GRI 412: Human Rights	Human Rights, p. 44 Code of Conduct Conflict Minerals Policy Human Rights Policy Corporate Responsibility Policies		Human Rights: Relevant policies, procedures, activities
GRI 417: Marketing and Labeling	2024 10-K, p. 11-23	Customers; Governments and regulators	
GRI 418: Customer Privacy	Data Privacy & Protection, p. 32 Gen Digital Privacy Norton LifeLock Product and Services Privacy Notices Global Privacy Statement Gen has a Global Privacy Policy to which it holds all employees responsible. The framework for this policy comes from both the Fair Information Processing Principles and GDPR. The overall privacy program aligns itself to the NIST privacy framework for evaluation. Gen takes a global approach to privacy wherever regional laws and regulations allow.	Customers; Governments and regulators	Human Rights: Relevant policies, procedures, activities

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
GRI 201: Economic Performance			
201-1	Direct economic value generated and distributed	2024 10-K	
201-2	Financial implications and other risks and opportunities due to climate change	We have conducted an analysis of our climate change risk but have not identified any climate-related risks with the potential to have a substantive financial or strategic impact on our business.	Environment: Relevant policies, procedures, activities
201-4	Financial assistance received from government	2024 10-K	

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
GRI 205: Anti-corruption			
205-1	Operations assessed for risks related to corruption	<p>100% of operations were assessed during our fraud risk assessment.</p> <p>Our FY23 Fraud Risk Assessment considered: aiding and abetting fraud by other parties, bribery and gratuities, cybercrimes, embezzlement, Foreign Corrupt Practices Act (FCPA) violations, fraud committed by customers, fraud committed by Resellers or Agents and receipt of bribes, kickbacks, and gratuities.</p>	Anti-corruption: Relevant policies, procedures, activities
205-2	Communication and training about anticorruption policies and procedures	<p>a. 100% of the Board have had the policies communicated to them. We do a live training once a year to the full Board, which includes anti-corruption.</p> <p>b. 100% of employees that are not on any sort of leave received the Code of Conduct training for FY24, which includes anti-corruption training.</p> <p>c. We're working with Sales to determine how the policies and procedures are communicated to business partners. Our policies and procedures for business partners are available publicly here and all are required to comply to do business with us: https://www.nortonlifelock.com/content/dam/nortonlifelock/pdfs/other-resources/gen-partner-code-of-business-conduct-en.pdf</p> <p>d. 100% of the Leadership team have had the policies communicated to them. The Leadership team gets the annual online training in addition to training the E&C Steering Committee. We also train 100% of active employees in our annual campaign, and we covered bribery/anti-corruption as a module in last year's campaign.</p> <p>e. 100% of employees that are not on any sort of leave received the Code of Conduct training for FY24, which includes anti-corruption training.</p>	Anti-corruption: Relevant policies, procedures, activities
205-3	Confirmed incidents of corruption and actions taken	None	Anti-corruption: Measurement of outcomes

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
GRI 206: Anti-competitive Behaviour			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	None	
GRI 401: Employment			
401-1	New employee hires and employee turnover	New hires: 398 (12%) Voluntary employee turnover: 270 full-time (8%)	Labour: Measurement of outcomes

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
401-2	Full-time benefits not provided to temporary/part-time employees	<p>Slight program variance by country: Employees actively working at least twenty (20) hours per week are eligible to participate in Gen’s Benefit Programs. Employees who actively work less than 20 hours per week are eligible, at a pro-rated rate, for our paid time off and company paid holidays and are also eligible for the Employee Assistance Plan.</p> <ul style="list-style-type: none"> • Life insurance • Healthcare • Disability • Leaves of Absence • State pension/Retirement Plan (401(k)) • Employee Assistance Plan (EAP) • Voluntary Insurance Programs • Wellness Programs • Fitness/Gym Reimbursement • Stock ownership/ESPP • Paid Parental Leave • Fertility benefits • Back-up Daycare/Elder Care • Adoption/Surrogacy Assistance • Company Paid Holidays • Paid Time Off (Vacation Time + Unlimited* Paid Time Off) • Work From Elsewhere (up to 30 days per year, time to work from a country outside of the employee's core location*) <p>* Program Details outline additional information; some location and other restrictions apply.</p>	Labour: Relevant policies, procedures, activities
401-3	Parental leave	a. All regular, full-time employees (20 hrs +) that experience the birth, adoption or placement of a new child.	Labour: Relevant policies, procedures, activities

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
GRI 404: Training and Education			
404-2	Programs for upgrading employee skills and transition assistance programs	Our People, p. 29	Labour: Relevant policies, procedures, activities
GRI 405: Diversity and Equal Opportunity			
405-1	Diversity of governance bodies and employees	<p>Performance Tables, p. 49-52 2024 10-K, p. 9-10</p> <p>Board Gender: 40% (4/10) women Age: 30% (3/10) between 30-50; 70% (7/10) 50+; 0 under 30 Underrepresented racial/ethnic group: 10% (1/10)</p> <p>Employees Age: <30: 16%; 30-50: 73%; >50: 11% Women in leadership (Global): 34% Women in workforce (Global): 34% Underrepresented racial/ethnic groups in leadership (U.S.): 12% Underrepresented racial/ethnic groups in workforce (U.S.): 17%</p>	Labour: Measurement of outcomes
GRI 412: Human Rights			
412-2	Employee training on HR policies or procedures	More than 99% of employees completed Code of Conduct training. Ethics & Governance, p. 43	<p>Human Rights: Relevant policies, procedures, activities</p> <p>Labour: Relevant policies, procedures, activities</p>
GRI 413: Local Communities			
413-1	Operations with local community engagement, impact assessments, and development programs	100%	Labour: Relevant policies, procedures, activities



Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
GRI 414: Supplier Social Assessment			
414-1	New suppliers that were screened using social criteria	All new suppliers were screened using CR criteria via our contracts system Agiloft.	<p>Human Rights: Relevant policies, procedures, activities</p> <p>Human Rights: Measurement of outcomes</p>
414-2	<p>Negative social impacts in the supply chain and actions taken:</p> <p>a. Number of suppliers assessed for social impacts.</p> <p>b. Number of suppliers identified as having significant actual and potential negative social impacts.</p> <p>c. Significant actual and potential negative social impacts identified in the supply chain.</p> <p>d. Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.</p> <p>e. Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why.</p>	<p>a. 2</p> <p>b. 0</p> <p>c. 0</p> <p>d. 0</p> <p>e. 0</p>	<p>Human Rights: Measurement of outcomes</p>

Disclosure	GRI Description	FY24 Answer	UNGC Cross-reference
GRI 417: Marketing and Labeling			
417-1	Requirements for product and service information and labeling	Gen Privacy Statement 2024 10-K	
417-2	Incidents of non-compliance concerning product and service information and labeling	None.	
417-3	Incidents of non-compliance concerning marketing communications	None. In 2015, LifeLock was fined by the Federal Trade Commission in part for deceptive advertising. This was one incident.	
GRI 418: Customer Privacy			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Details are confidential.	

Task Force on Climate-related Financial Disclosures (TCFD) Index

In this index, Gen provides information aligned with the [Task Force on Climate-related Financial Disclosures \(TCFD\)](#) recommendations and we intend to refine our strategy and reporting going forward. For additional information, please review the risk factors included in our [2024 10-K](#).

Disclosure	Response
Governance	
<p>a. Describe the board's oversight of climate-related risks and opportunities</p>	<p>The Nominating and Governance Committee of our Board of Directors has oversight of Environmental, Social and Governance (ESG) issues. As stated in the Charter of the Nominating and Governance Committee, the principal responsibilities and duties of the Committee include:</p> <ul style="list-style-type: none"> (a) Overseeing and reviewing annually the Company’s policies and programs concerning: (i) corporate social responsibility; (ii) public policy; (iii) philanthropy; (iv) political activities and expenditures; and (v) the Company’s participation and visibility as a global corporate citizen. (b) Overseeing and reviewing periodically the Company’s programs, policies and practices and relevant risks and opportunities relating to ESG issues and related disclosures and making recommendations to the Board regarding the Company’s overall strategy with respect to ESG matters. (c) Overseeing the management of risks that may arise in connection with the Company’s governance structures, processes and other matters set forth in the Charter [including corporate social responsibility or ESG matters] and reporting any risks to the Board. (d) Regularly reporting to the Board on the major items covered at each Committee meeting and making recommendations to the Board and management concerning such matters. <p>The Nominating and Governance Committee is responsible for climate change oversight as climate-related issues are included within the scope of ‘corporate social responsibility’ and ‘ESG issues and related disclosures’ that are part of the principal responsibilities and duties of the Committee. This Committee reports to the Board of Directors and has final approval on all climate-related decisions.</p> <p>The Nominating and Governance Committee receives quarterly updates on ESG from the Head of Marketing, Brand and Communications, CEO and at some meetings the Head of Corporate Responsibility. These quarterly updates are also shared with the entire Board of Directors on occasion. Climate-related issues are discussed as a scheduled agenda items at some of the Committee’s quarterly meetings and/or sporadically as important issues arise. The purpose of these regular updates is to confirm that ESG issues, including climate change, are considered when the Board is reviewing and guiding its major plans of action and strategy.</p>

Governance

b. Describe management's role in assessing and managing climate-related risks and opportunities

Assessment of climate risk is an integral component of our enterprise risk assessment which is implemented through broad engagement with senior managers across Gen Digital’s business. The Vice President of Marketing, Brand and Communications and the Head of Corporate Responsibility are responsible for reviewing strategies for managing risks and opportunities related to our GHG emissions with the Chief Executive Officer.

Strategy

a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term

Gen Digital has identified and assessed the following climate-related risks of relevance to our business as part of our Enterprise Risk Management (ERM) program.

Physical
As a global Company, we have facilities located in regions that are vulnerable to an increased frequency and severity of acute climate driven events such as hurricanes, wildfires and floods and chronic changes such as water scarcity and temperature rises.

Policy/Regulatory
It is important to our business to understand what climate-related laws and regulations impact us, and how we can maintain compliance. Climate-related regulation may impose added costs on our business and our failure to comply with them may lead to civil or criminal penalties.

Reputation
Our professional reputation is critical to our business, and any harm to our reputation could decrease the amount of business consumers and partners do with us, which could have an adverse effect on our future revenue and growth prospects. As our reputational risk relates to climate, if Gen Digital is perceived as a Company that is not environmentally responsible, it could negatively impact the public’s perception of the Company and reduce growth prospects for our service offerings and/or the business as a whole as customers seek companies that are taking progressive steps to address climate change.

Through our risk assessment process, we have not identified climate-related risks that have a material impact on our business. As a technology Company, most of our products and services are provided via electronic software distribution, which inherently reduces risks related to GHG emissions arising from the production and transportation of goods. We are a cloud-first Company with limited managed data center operations (i.e., data centers we own or colocate), reducing our inherent risks related to energy consumption and greenhouse gas emissions as well as our risks from physical climate changes. We operate a limited number of core physical office locations with a significant number of remote and hybrid employees and contractors across the world, further reducing our GHG emissions due to the transportation of people and increasing our overall resilience to physical climate changes.

Strategy

b. Describe the impact of climate-related risks and opportunities on the organization's business, strategy and financial planning

While we have not identified climate-related risks and opportunities that we consider material to our business, we have taken steps to better understand our emissions profile and inform our sustainability strategy. For example, we have completed a life cycle assessment of our physical products, identifying any emissions hotspots across the value chain of the products. In evaluating climate risk in our supply chain, we also completed an analysis to evaluate what percentage of our suppliers by spend have set, or committed to set, science based GHG emissions reduction targets. This helps us to target our engagement efforts towards suppliers which have not yet taken these steps. We have also added ESG, including climate-related, questions to our supplier onboarding process. Finally, we incorporated climate risk into operational strategy by continuing an ongoing effort to optimize our facilities footprint, consolidating office space and closing several sites. This consolidation effort is driving energy and GHG emissions reductions.

Climate related risks and opportunities have influenced our financial planning in that we budget for additional climate strategy costs for dedicated staff and consulting resources. Additionally, in FY22 we launched an employee home improvement grant program whereby all employees are eligible for up to \$500 per year to invest towards sustainable home improvements. These grant costs are incorporated into our annual budgeting process.

c. Describe the potential impacts of different scenarios, including a 2°C scenario, on the organization's businesses, strategy and financial planning

Seeking to further understand our exposure to transitional risk, we conducted a carbon pricing analysis which modeled future carbon pricing implications from 2025 to 2050, under six NGFS (Network for Greening the Financial System) pricing scenarios. Additionally, we examined potential implications of a carbon price based on the IEA 2DS scenario, which describes an energy system consistent with an emissions trajectory that recent climate research indicates would give an 80% chance of limiting global temperature increase to +2°C. The examination of these carbon price scenarios helped us to understand our potential exposure to carbon pricing. While, even under the highest carbon price scenario, the potential implications are not considered material for Gen, the analysis indicated that strategic investment in emissions reductions will reduce our Company's future exposure in a transition to a low carbon economy.

In assessing physical risk, we used scenario analysis to determine its exposure to water stress. We found that our percentage of direct operations located in water-stressed areas, defined as "High" or "Extremely High" baseline water stress, increased from 25% in 2022 to 70% in 2030 and 66% in 2040. It should be noted that these are forecasts with a high degree of uncertainty. While we may see some increased water costs and/or restrictions as a result of increases in baseline water stress, as a technology Company whose products are mostly delivered in digital format, we do not have water intensive operations, and therefore do not anticipate significant direct impacts for our business. The results have therefore not driven a change in our business strategy. We are aware that significant increases in water stress could drive broader socio-economic changes in some regions in which we operate which could in turn have implications for our employees and business. We consider socio-economic trends as part of our enterprise risk management process.

Risk Management

a. Describe the organization's processes for identifying and assessing climate-related risks

As a component of our broader ERM program, we conducted an initial assessment of climate change risk to inform understanding of our exposure to short-, medium- and long-term physical and transition risk. In line with the ERM process, the assessment involved the following steps:

- Understanding the Company’s objectives and strategic imperatives related to ESG and climate related risks;
- Gathering inputs through interviews and/or surveys with select members of management and the board;
- Obtaining current risk-related literature from external resources, like rating agencies, public accounting firms, the SEC, etc.;
- Analyzing and consolidating interview results;
- Analyzing risks identified through internal channels and comparing those to risks identified by external sources, including a ranking and rating of risks against factors, such as likelihood of occurrence, severity of impact, degree of vulnerability and level of mitigation;
- Considering impact to (1) financial performance, (2) the legal/regulatory landscape and requirements, (3) brand, (4) systems and processes, (5) shareholder value, (6) other external factors, (7) complexity of business operations or need for a new business model, (8) change management, (9) execution, (10) integrity and ethics, (11) process maturity and (12) other factors, as applicable; and
- Reporting risk profile to stakeholders.

b. Describe the organization's processes for managing climate-related risks

Management of physical climate-related risks is integral to our business continuity and disaster recovery program. Transitional risks related to our GHG emissions footprint and our external disclosures are managed by our Corporate Responsibility team in partnership with an extended group of internal business functions and stakeholders, and supported by external consultants.

c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organization's overall risk management

Risks considered in our climate risk assessment are integrated to our overarching ERM program and included in our enterprise risk register, which is used to compile a holistic view on our Company’s risk profile, enabling management to determine if additional risk response activities are required to address significant risks to the organization’s culture, brand, reputation, compliance, people, operations and financial results.

Disclosure	Response
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Targets	
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<p>a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process</p>	<p>Gen Digital uses Scope 1, 2 and 3 emissions data and year-over-year changes to assess climate-related risk in line with its strategy and risk management process.</p>
<p>b. Disclose Scope 1, Scope 2 and if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related riskss</p>	<p>Performance Tables, p. 53</p>
<p>c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets</p>	<p>We aim to reduce our emissions year-over-year. Total Scope 1 and 2 GHG emissions decreased by 22% between FY23 and FY24. The change is driven by consolidation of facilities/data centers and internal efficiencies.</p> <p>Gen Digital is developing a strategy to reduce our GHG emissions across the global enterprise and engage our employees to help them reduce their own emissions both at work and at home. In FY24, more than 1,000 Gen employees participated in the Home Improvement Program, taking on projects that improved home energy efficiency, created a more sustainable home, saved water and other positive environmental outcomes. Projects ranged from upgrading refrigerators to installing composting systems. The majority of the projects addressed energy usage within the home with many projects trading out old appliances for a sustainable, energy-efficient appliance and installing PV panels to generate renewable electricity.</p>

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