



CONFLICT MINERALS POLICY

(Last reviewed on March 18, 2025)

Gen Digital Inc. is committed to respecting human rights wherever we do business around the globe. We believe in the importance of upholding human rights, including in our supply chain. We are aware of concerns that certain minerals mined in conflict areas in the Democratic Republic of the Congo ("DRC") and adjoining countries ("Covered Countries") may make their way into the supply chains of products used in the electronics industry; and we are committed to excluding the usage of these conflict minerals in our products.

BACKGROUND

The U.S. Securities and Exchange Commission ("SEC") adopted a rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act that requires companies to disclose whether the products they manufacture or contract to manufacture contain conflict minerals that originated in the DRC or Covered Countries. "Conflict minerals" include columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives (tantalum, tin, gold and tungsten), and others if later determined by U.S. Secretary of State to finance conflict in the DRC or Covered Countries.

OUR COMMITMENT

We support the aims and objectives of the U.S. legislation on the supply of conflict minerals and are committed to the responsible sourcing of minerals from the DRC and Covered Countries. Therefore, we are committed to comply with the legislation and work with our suppliers to procure conflict minerals through a validated supply chain and thus ensuring our products are "DRC Conflict Free." In furtherance of our commitment, we:

- created a governance structure to operationalize this conflict minerals policy;
- communicated this policy with our suppliers;
- engaged with the Electronic Industry Citizenship Coalition ("EICC"); and
- developed a comprehensive due diligence process that is in line with the Organization for Economic Cooperation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals From Conflict Affected and High-Risk Areas.

SUPPLIER EXPECTATIONS

We expect our suppliers to support this policy. Accordingly, we expect our suppliers to:

- respond to our inquiries related to conflict minerals to ascertain the source of the conflict minerals being supplied to us;
- not include any tin, tantalum, tungsten or gold mined in the DRC or Covered Countries in any products sold to us;
- adopt a conflict minerals policy, due diligence practices, and management systems, consistent with the OECD guidelines and to drive those efforts throughout their supplier chain;
- use EICC-GeSI designated Conflict-Free Smelters as the source for any of the conflict minerals used in the products sold to us, when feasible.

In the event that a supplier cannot or will not conform to these expectations, it is our intent to seek alternative suppliers where commercially practicable.