

## **FINANCIAL CODE OF ETHICS**

(as amended and restated on August 25, 2025 to reflect certain administrative enhancements)

Gen Digital, Inc. (the "Company") is dedicated to ensuring compliance with the highest standards of financial accounting and reporting and has the highest confidence in its accounting policies, financial reporting, underlying systems of internal controls, and its finance organization employees. Our finance organization employees operate under the highest level of ethical standards. Our Financial Code of Ethics embodies these principles and requires that our board of directors, Chief Executive Officer, Chief Financial Officer, all members of our finance organization worldwide, and all employees involved in the preparation and review of externally-reported financial reports, filings, and documents of the Company are expected to adhere to the following practices:

- 1. Act with honesty and integrity and use due care and diligence in performing one's responsibilities to the Company and avoid situations that represent actual or apparent conflicts of interest with one's responsibilities to Company. Any potential conflict must be promptly disclosed and reviewed by appropriate Company authorities before action is taken.
- 2. Communicate information in a manner that ensures full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, government agencies and in other public communications.
- 3. Comply with applicable laws, rules, and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
- 4. Respect and safeguard the confidentiality of information acquired in the course of one's work, including material non-public information, except when authorized or legally obligated to disclose such information, and in any event, not use confidential information for personal advantage.
  - 5. Share knowledge and maintain skills important and relevant to a stakeholder's needs.
- 6. Proactively promote and be an example of ethical behavior as a responsible partner among peers, in the work environment, and in the community.
- 7. Achieve responsible use of and control over all assets and resources employed or entrusted.
- 8. Promptly report to the Chief Financial Officer, General Counsel, or the Audit Committee of the Board of Directors any conduct that the individual believes to be a violation of law or business ethics or of any provision of this Financial Code of Ethics, including any transaction or relationship that reasonably could be expected to give rise to such a conflict. The Company strictly prohibits retaliation against anyone who reports concerns in good faith.
  - 9. Recognize that the Audit Committee is directly responsible for the appointment,

compensation, and oversight of the work of the Company's independent auditors and work cooperatively with the Company's independent auditors in their review of the company's financial statements and disclosure documents. Employees must respect the independent auditor's role, cooperate fully, and avoid any attempt to improperly influence, coerce, manipulate, or mislead auditors.

10. Understand accountability for compliance with this Financial Code of Ethics, both personally and for those under one's supervision, and recognize that violations may result in disciplinary action by the Company, up to and including termination.

The Company intends that the Financial Code of Ethics be our written code of Ethics under Section 406 of the Sarbanes-Oxley Act of 2022, complying with the standards set forth in SEC Regulation S-K Item 406.