



CORPORATE GOVERNANCE GUIDELINES

(as amended and restated on March 23, 2026)

The Board of Directors (the “Board” or individually “Director”) of Gen Digital Inc. (the “Company”) is responsible for ensuring that the Company is managed in a manner that fulfills its duties to stockholders. However, in carrying out such responsibility, Directors may take into consideration the interests of other stakeholders.

The Board must, among other things, review the Company’s strategy, monitor corporate performance relative to that strategy, select the Chief Executive Officer of the Company, review the performance and compensation of the Chief Executive Officer, plan for the succession of the Chief Executive Officer, ensure compliance with laws and accounting principles and assess the performance of the Board itself. These are active, not passive, responsibilities. The Board also has ultimate responsibility for oversight of the Company’s risk management activities. The execution of the Company’s strategy and day-to-day management of the Company’s business is the responsibility of the Company’s management.

A. SELECTION AND QUALIFICATIONS OF BOARD MEMBERS

1. Selection of New Directors

The Board itself is responsible for selecting its own members and for recommending them for election by the stockholders. The Board has delegated the screening process involved to the Nominating and Governance Committee, with direct input from the Chair of the Board (“Chair”) and the Chief Executive Officer. The invitation to join the Board should be extended on behalf of the Board by the Chair of the Nominating and Governance Committee and by the Chief Executive Officer.

2. Nomination Process

The Company’s Corporate Secretary shall be notified of all persons proposed to serve as potential candidates for nomination to the Board. For nominations of potential new candidates made other than by the Board, the stockholder or other person making such nomination shall comply with the Company’s Bylaws.

3. Board Membership Criteria and Composition

The Nominating and Governance Committee is responsible for reviewing, on an annual basis, the appropriate skills and characteristics required of members of the Board in the context of the composition of the Board and the stage of the business of the Company. The goal of the Nominating and Governance Committee is to assemble a Board that offers a diverse portfolio of perspectives, backgrounds, experiences, knowledge, and

skills derived from high-quality business and professional experience. This assessment should take into account the results of the Board's annual self-evaluation process and include an assessment of cyber safety and technology expertise, leadership experience, public company board experience, business combinations and partnership experience, financial experience, sales, marketing and brand management, perspectives and backgrounds. In particular, the Nominating and Governance Committee and the Board believe that Board deliberations and decision-making are strengthened by drawing on a broad set of skills, talents, perspectives and life experiences. The Nominating and Governance Committee actively seeks out candidates with these qualifications to ensure the Board is effectively positioned to appreciate and respond to the dynamic set of challenges companies face.

Any candidate to be considered for a position as a member of the Board shall

(a) be an experienced person with strong business, technical and/or other skills relevant to the Company's business, (b) have demonstrated the highest levels of ethics, integrity, and values, and (c) be willing to commit to diligently represent the long-term interests of the Company's stockholders in good faith.

4. Majority Vote Standard

The Company's Bylaws provide that Directors are elected by a majority of the votes cast. To effectuate this policy with regard to incumbent Directors, the Board will not nominate an incumbent Director for re-election unless prior to such nomination the Director has agreed to promptly tender a resignation if such Director fails to receive a sufficient number of votes for re-election at the stockholder meeting with respect to which such nomination is made. Such resignation will be effective upon the earlier of (i) the Board's acceptance of such resignation or (ii) the 90th day after certification of the election results of the meeting; provided, however, that prior to the effectiveness of such resignation the Board may reject such resignation and permit the Director to withdraw such resignation.

If an incumbent Director fails to receive the required vote for re-election, the Nominating and Governance Committee shall act on an expedited basis to make a recommendation as to whether to accept or reject the Director's resignation and will submit such recommendation for prompt consideration by the Board. The Board intends to act promptly on the Committee's recommendation and will decide to accept or reject such resignation and publicly disclose its decision within 90 days from the date of certification of the election results. The Nominating and Governance Committee and the Board may consider such factors they deem relevant in deciding whether to accept or reject a resignation tendered in accordance with this policy. The Board expects a Director whose resignation is under consideration to abstain from participating in any decision regarding the resignation.

5. Director Orientation and Continuing Education

The Company will conduct appropriate orientation programs for newly elected Directors, including presentations by senior management, to familiarize new Directors

with the Company's strategic plans; significant financial, accounting and risk management issues; and the Company's Code of Conduct. In addition, the Company supports continuing Director education about the Company, its industry, its legal and regulatory environment and other subjects, and regularly identifies programs for attendance by members of the Board.

B. BOARD COMPOSITION

1. Size of Board

The Company's Bylaws provide that the number of members of the Board is determined by the Board. The Board's size is reviewed and assessed at least annually by the Nominating and Governance Committee to ensure that the current number of members most effectively support the Company and recommends changes to the Board as appropriate.

2. Board Independence

It is the policy of the Company that the Board consists of a majority of independent Directors, as defined under the listing standards of The Nasdaq Stock Market LLC, as amended from time to time. The Nominating and Governance Committee will review and assess the independence of each Director and confirm that the independent members of the Board do not have a material relationship with the Company, other than as a Director, that would interfere with the exercise of independent judgment in carrying out the responsibilities as a member of the Board.

3. Board Leadership

The Board will appoint the Chair in compliance with the Company's Bylaws. The Nominating and Governance Committee is responsible for reviewing and recommending to the Board, annually, or upon a vacancy, a Director for election as Chair. The Chair will be appointed for a one-year term and will serve until their successor is elected and qualified, or until their earlier death, removal, or resignation.

When the Chair elected in accordance with the preceding paragraph is not an independent Director, the independent Directors of the Board will, upon the recommendation of the Nominating and Governance Committee, appoint a Lead Independent Director. The Lead Independent Director will be appointed for a one-year term and will serve until their successor is duly appointed and qualified, or until their earlier death, removal, or resignation, or until such time as they are no longer an independent Director of the Board.

Duties and Role of Chair of the Board

In addition to other duties set forth in these Guidelines and the Company's Bylaws and as may be prescribed by the Board, the Chair will:

- Preside over and manage the meetings of the Board;
- Support a strong Board culture by fostering an environment of open dialogue, effective information flow, and constructive feedback among the

members of the Board and senior management, facilitating communication among the Lead Independent Director, the Board as a whole, Board committees, and senior management, and encouraging Director participation in discussions;

- Propose to the Lead Independent Director for approval, if applicable, the scheduling of Board meetings and the agenda and materials for each such meeting; and
- Represent the Board at annual meetings of stockholders and be available, when appropriate, for consultations with stockholders.

Additional Duties and Role of Independent Chair of the Board

In addition to other duties set forth in these Guidelines and the Company's Bylaws and as may be prescribed by the Board, including those set forth in the immediately preceding section for a Chair, if the Chair is an independent Director, the Chair will also:

- Serve as liaison between management and the independent Directors;
- Approve the scheduling of Board meetings and the agenda and materials for each such meeting;
- Approve and coordinate the retention of advisors and consultants to the Board;
- Call and preside over executive sessions of the independent Directors;
- Serve as the primary point of contact between the Board and stockholders; and
- Act as an advisor to the Chief Executive Officer on strategic aspects of the business.

Duties and Role of Lead Independent Director

In addition to the other duties set forth in these Guidelines and as may be prescribed by the independent Directors on the Board, the Lead Independent Director, if applicable, will:

- Preside over and manage all meetings of the Board at which the Chair is not present, including call and preside over executive sessions of independent Directors;
- Serve as a liaison between the independent Directors and the Chair, and where appropriate, between the independent Directors and management;
- Facilitate discussion and open dialogue among the independent Directors during Board meetings, executive sessions, and outside of Board meetings;
- Review, advise on, and ultimately approve the scheduling of Board meetings, and the agenda and materials for each such meeting as proposed by the Chair;

- Approve and coordinate the retention of advisors and consultants to the Board;
- Work with the Chair to facilitate timely and appropriate information flow to the Board;
- Provide the Chair with feedback and counsel concerning the Chair's interactions with the Board; and
- Represent the Board at annual meetings of stockholders, serve as the primary point of contact between the Board and stockholders, and be available, when appropriate, for consultations with stockholders.

Qualifications of Lead Independent Director

The purpose of the Lead Independent Director is to serve as a counterbalance to the Chief Executive Officer and provide strong, objective, independent leadership for the board, in order to safeguard stockholder interests. To serve as Lead Independent Director, a Director must meet the independence standards of the Nasdaq Stock Market. Additionally, such Director must (1) be available to work closely with and act as an advisor to the Chair and the Chief Executive Officer, (2) be available to effectively discuss with other Directors concerns about the Company or the Board and relay those concerns, where appropriate, to the Chair and the Chief Executive Officer or other members of the Board, (3) ensure the effectiveness of the Board and that it maintains its independence from management, and (4) be familiar with corporate governance best practices.

4. Conflicts of Interest

The Board recognizes that, given the diverse personal and business interests of its independent Directors, some of whom are active in the same industry segments in which the Company does business, there may be occasions when actual or potential conflicts of interest arise between the Company and an independent Director by virtue of the Director's personal or business interests. In those instances, it is the policy of the Board that such interests shall be fully disclosed to the Board, and the affected Director will be excused from those meetings of the Board, or portions thereof, where the matter in conflict is discussed or voted upon. If a Director becomes aware of a situation which presents the potential for a conflict of interest, the Director shall discuss the matter with the Chair of the Board and the Chair of the Nominating and Governance Committee. In addition, all conflicts or potential conflicts are subject to applicable provisions of the Company's Code of Conduct and Related Person Transaction Policy.

5. Changes in Circumstances

The Board should consider whether a change in an individual's professional responsibilities directly or indirectly impacts that person's ability to fulfill directorship obligations. To facilitate the Board's consideration, all Directors shall submit a resignation as a matter of course upon retirement, a change in employer, or other significant change in their professional roles and responsibilities. Such resignation may be accepted or rejected at the discretion of the Board.

6. Limitations on Other Directorships

It is the policy of the Board that given the demands of the duties undertaken by Directors, without specific approval from a majority of independent Directors, a Director, who is not currently serving as an executive officer of a publicly traded company, should limit his or her participation to no more than five (5) publicly traded company boards, which includes the Company's Board (for avoidance of doubt, there is no specific limitation on service on the Boards of non-profit organizations or privately held companies). However, the Board recognizes that the demands of such participation may vary substantially and may deem an exception appropriate so long as the Director maintains sufficient attention and availability to fulfill his or her duties to the Company and complies with the Company's conflict of interest policies. In addition, without specific approval from a majority of independent Directors, a Director who is currently serving as an executive officer of a publicly traded company may serve on no more than two (2) public company boards, excluding the Company's Board.

7. Evaluation of Performance of Board Members

The Board and the Board committees will conduct an annual self-evaluation. The Nominating and Governance Committee oversees this self-evaluation process, assesses the results, and recommends changes to improve the effectiveness of the Board and its committees as appropriate.

8. Election of Directors/Term Limits

All Directors are elected annually for one-year terms. The Board does not believe that it should establish term limits. While term limits could help to ensure that there are fresh viewpoints available to the Board, they also have the disadvantage of losing the contribution of Directors who have been able to develop, over a period of time, increasing insight into the Company and its operations and, therefore, provide an increasing contribution to the Board as a whole.

9. Retirement/Age Limits

In the event that a Director reaches the age of 72 during his or her term of service, at the end of such term, the Board, in consultation with the Nominating and Governance Committee, will normally not re-nominate the Director for election at the next annual meeting, unless the Board, with the recommendation of the Nominating and Governance Committee, determines that there are special circumstances that lead the Board to conclude that continued service of such Director is in the best interests of the Company and its stockholders.

C. BOARD COMPENSATION

1. Board Compensation

The Compensation and Leadership Development Committee will evaluate the compensation to be paid to members of the Board and will develop a recommendation to the whole Board on an annual basis. It is the policy of the Board that such compensation may be paid in cash, equity, or a mixture thereof, with specifics to be determined based on

relevant factors such as current market conditions, best practices, and common practices among similar businesses.

2. Stock Ownership

It is the policy of the Board that the Directors and executive officers should have a financial stake in the Company in order to further align their interests with those of the Company's stockholders. The Compensation and Leadership Development Committee shall determine the stock ownership guidelines for the Directors and executive officers, and the Nominating and Governance Committee will monitor compliance under such guidelines.

D. BOARD RELATIONSHIP TO SENIOR MANAGEMENT

1. Access to Senior Management

Directors are free to contact members of the Company's management and are encouraged to coordinate their contacts with the Chief Executive Officer, Chief Operating Officer, President, Chief Financial Officer, Chief Human Resources Officer, Vice President, Finance, General Counsel or Secretary. Furthermore, the Board encourages the Chief Executive Officer to, from time to time, bring into Board meetings members of management or other employees who (a) can provide additional insight into the matters being discussed because of personal involvement in those areas, and/or (b) represent individuals with future management potential that the Chief Executive Officer believes should be given exposure to the Board.

2. Succession Planning

The Compensation and Leadership Development Committee will ensure that management addresses with the Board its plans for development and succession planning for the executive officers. The Nominating and Governance Committee will oversee the Board's annual review of the Chief Executive Officer's long-term succession plan as well as the recommendation of a successor for the Chief Executive Officer should the Chief Executive Officer unexpectedly become unable to continue in that capacity.

3. CEO Performance Evaluation

At least once per year, the Nominating and Governance Committee will ensure that the independent Directors evaluate the performance of the Chief Executive Officer. Based on the findings made in the evaluation by the Board and such other considerations as deemed appropriate, the Compensation and Leadership Development Committee may recommend changes in the Chief Executive Officer's compensation. Any changes in the compensation for the Chief Executive Officer will be approved by the independent Directors.

4. Separate Meetings of Independent Directors

In addition to meeting separately to evaluate the performance of the Chief Executive Officer, the independent Directors may meet separately on such other occasions as the independent Directors deem appropriate. If they deem it appropriate, the

independent Directors may, at the Company's expense, also retain legal counsel or other advisors to advise them on matters as to which management may have a conflict of interest.

E. MEETING PROCEDURES

1. Frequency of Meetings

There shall be at least five regularly scheduled meetings of the Board per year. The Board may hold additional meetings as needed. Board members are expected to participate in meetings of the Board and committees on which they serve on.

2. Setting of Agenda for Board Meetings

After taking into account suggestions from other members of the Board, the Chair of the Board and the Lead Independent Director (if applicable) will establish the agenda for each Board meeting. If the Chair is not also the Chief Executive Officer, the Chair shall consult with the Chief Executive Officer regarding the agenda.

3. Board Materials Distributed in Advance

To the extent possible, concise summaries of information and background materials that are important to the Board's understanding of the business and matters to be considered at its meetings should be distributed in writing to the Board sufficiently in advance of the meetings for the Board to review and consider them.

4. Executive Sessions of Independent Directors

The independent Directors will meet in executive sessions, with only the independent Directors in attendance, for a portion of each regularly scheduled meeting of the Board.

F. BOARD COMMITTEE MATTERS

1. Establishment of Board Committees

The Board will maintain at least three standing committees: an Audit Committee, a Compensation and Leadership Development Committee and a Nominating and Governance Committee. The purpose and responsibilities for each of these committees shall be outlined in their charters. After consultation with the Nominating and Governance Committee, the Board may, from time to time, form a new committee, re-allocate responsibilities of one committee to another committee or disband a current committee depending on circumstances. In addition, the Board may determine to form additional committees as appropriate.

2. Independence of Board Committees

The Audit Committee, Compensation and Leadership Development Committee and Nominating and Governance Committee shall be composed entirely of independent Directors satisfying applicable legal, regulatory, and stock exchange requirements necessary for an assignment to any such committee. All other committees formed by the Board shall be chaired by independent Directors, except where the Board, pursuant to the

recommendation of the Nominating and Governance Committee, determines otherwise.

3. Committee Resources

The Company shall provide committees with appropriate resources with which to carry out their responsibilities, including, but not limited to, sufficient funds to retain and consult with such outside technical, management, legal, financial, accounting, and other experts as the committees deem appropriate in the exercise of their reasonable business judgment.

G. AUTHORITY AND OTHER MATTERS

1. Risk Management Oversight

The Board and its committees shall have an active role in overseeing the Company's risk management processes. Subject to the nature of the risk, such as financial, operational, strategic, human resource, or compliance-oriented, the Board or an appropriate committee delegated by the Board, shall regularly review the identification, measurement, prioritization, management, and monitoring of enterprise risks.

2. Board Communication with Stakeholders

Any stockholder who wishes to contact members of our Board may do so by mailing written communications to: Gen Digital Inc., 60 E. Rio Salado Parkway, Suite 1000, Tempe, Arizona 85281, Attention: Corporate Secretary. The Corporate Secretary will review all such correspondence and provide regular summaries to the Board or to individual Directors, as relevant. The Corporate Secretary will also coordinate any requests from stockholders for additional communications with the Chair or, if the Chair is not independent, the Lead Independent Director.

It is the policy of the Board that management has the primary responsibility to communicate with stockholders, media, customers, employees, government, and other constituencies that are involved with the Company, and to set policies for those communications. Therefore, the Board may occasionally communicate with such stakeholders, but will generally do so only at the request of or with the prior knowledge of management, and individual Directors will only engage in such communications with the approval of the Chair, or if the Chair is not independent, then the Lead Independent Director.

3. Attendance at Annual Meetings of Stockholders

The Board encourages all its members to attend the Annual Meeting of Stockholders.

4. Non-Employee Director Stock Ownership Requirements

All non-employee Directors are subject to the following stock ownership requirements:

- Directors must maintain a minimum holding of Company stock with a fair market value equal to ten times such Director's total annual cash retainer.

- Unvested equity award shares shall count towards the holding minimum.
- New Directors will have five years from the date of their appointment to reach the minimum holding level.

Notwithstanding the foregoing, Directors may sell enough shares to cover their income tax liability on vested grants. Directors who serve as employees of the Company will be subject to any stock ownership requirements adopted by the Compensation and Leadership Development Committee.

5. Stockholder Approval of Executive Officer Severance Benefits

The Board will seek stockholder approval before the Company enters into any new employment agreement, severance agreement or similar arrangement with any executive officer of the Company, or before the Board or the Compensation and Leadership Development Committee establishes any new severance plan or policy covering any executive officer of the Company, in each case, that provides for Cash Severance Benefits exceeding 2.99 times the sum of the executive officer's Base Salary plus Target Bonus. For this purpose:

"Cash Severance Benefits" means cash payments: (i) in respect of the termination of the executive officer's employment; (ii) to secure an agreement not to compete with the Company; or (iii) to offset any tax liability in respect of any of the foregoing. For the avoidance of doubt, "Cash Severance Benefits" do not include (a) the payment, vesting, acceleration or other handling of equity-based awards granted under stockholder-approved plans prior to the executive officer's termination of employment, (b) payment of deferred compensation, earned retirement benefits or other vested employee benefits, in each case consistent with normal practices, provided under the Company's retirement or employee benefit plans, (c) the provision of perquisites, insurance, disability, health and welfare plan coverage and other non-cash benefits generally available to similarly-situated employees, (d) any interest required to be paid pursuant to the terms of any Company plan or policy between the termination date and the payment date, (e) any unpaid bonus for any previously completed performance period required to be paid pursuant to the terms of any Company plan or policy, (f) accrued but unpaid Base Salary or vacation pay through the termination date and reimbursement for any expenses validly incurred prior to the termination date, or (g) payments for any post-termination consulting services.

"Base Salary" means the amount an executive officer is entitled to receive as wages or salary on an annualized basis, excluding all bonus, overtime, health additive and incentive compensation, payable by the Company as consideration for the executive officer's services, provided that following a Change in Control (as defined in the Company's Executive Retention Plan), "Base Salary" means the higher of (x) the executive officer's Base Salary as in effect immediately prior to the Change in Control and (y) the executive officer's highest Base Salary in effect at any time thereafter.

"Target Bonus" means the executive officer's target bonus under the Company's annual incentive plan applicable to the executive officer for the year of termination,

provided that if no target bonus has been established for such year under such plan, the year immediately preceding the year of termination, provided further that following a Change in Control (as defined in the Company's Executive Retention Plan), "Target Bonus" means (x) the Participant's Target Bonus immediately prior to the Change in Control, provided that if no Target Bonus has been established for such year under such plan, the year immediately preceding the year in which the Change in Control occurs or (y) the executive officer's Target Bonus in effect at any time after the Change in Control.

6. Compliance with Guidelines and Policies

All Board members will comply with these Guidelines and all other Company policies and procedures applicable to members of the Board.