



## **FINANCIAL CODE OF ETHICS**

Amended and Restated on June 12, 2006  
to Reflect Certain Administrative Enhancements

NortonLifeLock Inc. (the "Company") is dedicated to ensuring compliance with the highest standards of financial accounting and reporting and has the highest confidence in its financial reporting, underlying systems of internal controls, and its financial employees. Our financial employees operate under the highest level of ethical standards. Our Financial Code of Ethics embodies these principles and requires that our Chief Executive Officer, Chief Financial Officer, and other members of the Company's Finance Department 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.
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 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 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.
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.

10. Understand accountability for compliance with the Financial Code of Ethics by the individual and by those under his or her supervision and understand that deviations from the Financial Code of Ethics may result in disciplinary action by the Company, including termination.