



Gen Digital Inc. Modern Slavery Act FY25 Statement

On March 26, 2015, The Modern Slavery Act 2015 was passed into law in the United Kingdom. This law requires all business entities that complete business, or part of a business, in any part of the United Kingdom and operate above a specific turnover threshold, to prepare and publish a slavery and human trafficking statement for each financial year of the organization. Gen Digital Inc. (NASDAQ: GEN), a global leader in consumer Cyber Safety, fully supports the aims of the legislation.

The California Transparency in Supply Chains Act of 2010 requires retail sellers and manufacturers with annual worldwide gross receipts over \$100 million doing business in the state of California to publicly disclose their efforts to eradicate slavery and human trafficking from their direct supply chains.

The California Transparency in Supply Chains Act of 2010, which applies to more than 3,000 companies – many of which are large consumer brands – aims to give consumers the information to help them make purchasing decisions that will help eradicate slavery and human trafficking. Gen supports the aims of the legislation and, in compliance with the California Transparency in Supply Chains Act has published a [Disclosure Statement](#).

Gen is committed to respecting human rights wherever we do business around the globe. We believe in the importance of upholding human rights, including the rights to privacy and freedom of expression as well as human rights in the supply chain. We engage with our stakeholders to continually refine our approach and related policies and practices. Our [Human Rights Policy Statement](#) builds on our commitment to uphold the ten principles of the [United Nations Global Compact](#) and is aligned with the [Universal Declaration of Human Rights](#). Gen seeks to protect and advance human dignity and human rights in our global business practices. We comply with the requirements of the United States Government regulation on combatting trafficking in persons.

At Gen we continue our commitment to support the ten principles of the [United Nations Global Compact](#) (UNGC). Gen encourages all companies to adopt the UNGC's ten principles to protect human rights, uphold ethical labor conditions, preserve the environment, and combat corruption. In the years since we became a member, we have worked diligently to strengthen our own performance and share best practices and thought leadership with others.

Gen's [Global Supplier Code of Conduct](#) is applicable to all Gen suppliers of products and services. Suppliers are responsible for ensuring that all their employees and any subcontracted party performing work for Gen are informed and agree to comply with the Global Supplier Code of Conduct.

In FY25, zero human rights issues were reported through [EthicsLine](#), our anonymous third-party managed compliance hotline. Through our supplier onboarding process, we screen our suppliers for human rights alignment and efficiently track them through a digitized vendor platform. In FY25, 100% of suppliers were considered "low risk" for human rights violations based on the Company's own review and supplier declaration. Gen employees received human rights training in early FY25 as part of our annual mandatory Code of Conduct training. Human rights training modules have been added to our employee learning and development system.

All our policies and statements are available to employees via our website. Employees are expected to report any Gen Code of Conduct or human rights violations to their manager, anyone in their management reporting chain, a Human Resources representative, or the [Office of Ethics and Compliance](#) at XRM-ethicsandcomplnc@gendigital.com to Gen's [EthicsLine](#) which is run by an external, independent third party. Employees may report concerns anonymously and toll-free or online at [EthicsLine's](#) website. Customers, suppliers, partners, shareholders, indeed any stakeholder, may also use the [EthicsLine](#) to inform Gen of suspected ethical conduct violations. Employees are required to complete the Gen Code of Conduct Training at regular intervals.

Sue Barsamian

21 Aug. 2025 12:47:18 PM PDT
Sue Barsamian
Chair of Gen Nominating and Governance Committee

Approved on: June 23, 2025