



Guiding Principles

The following Influencer and Engaged Social Media Policy (“Policy”) applies when blogging, posting on social media, or making written or verbal statements about Gen, Gen brands, Gen offerings, or any variation thereof at the request of Gen Digital Inc. (“Company”), through a third party engaged by the Company, or when the Company has provided you, directly or indirectly, with free or discounted services or any incentive for you to blog, post, review, endorse, or otherwise promote Company products or services.

Scope of the Policy

This Policy applies to external marketing influencers, endorsers, reviewers, bloggers, creators, agencies, contractors, or other third parties engaged by or incentivized by the Company to create, share, or publish content about Gen, Gen brands, Gen offerings, or competitors. “Blogging” or “Blog” includes sharing information on Company-owned websites or third-party websites, platforms, applications, or media in any format, including social media posts, videos, reviews, comments, articles, podcasts, live streams, or other written, verbal, audio, visual, or multimedia communications.

Policy

Be Transparent and Include Disclosures

You are responsible for complying with applicable advertising, endorsement, consumer protection, and social media disclosure requirements, including Federal Trade Commission guidance requiring material connections between advertisers and endorsers to be disclosed clearly and conspicuously. Whether you were directly engaged by the Company or received an incentive to review, recommend, or promote Company products or services, you must make your connection to the Company clear to the public in a way that is easy for consumers to notice and understand. Examples may include using a disclosure such as #Ad or #TeamGen, including “sponsored by Gen,” or placing a clear sponsorship disclosure at the beginning of the content. Disclosures should not be hidden in a profile, footnote, separate page, or location that requires users to click or search for the disclosure.

Give Your Honest and Truthful Opinions

Statements about the Company’s products or services must reflect your honest and truthful opinions and actual experiences. Do not make false, misleading, unsupported, or exaggerated claims about Gen, Gen products or services, or competitors. Avoid linking to or including content that is offensive, unlawful, inappropriate for the intended audience, or inconsistent with the Company’s reputation and brand standards.

Only Make Factual Statements That Are Truthful and Can Be Verified

Only make factual statements about product or service characteristics, quality, performance, features, or comparisons when you know with reasonable certainty that the statement is truthful, accurate, current,



and capable of being verified. This Policy applies to both express and implied claims. If you are creating content at the Company's direct request, obtain any required review or approval before publishing, including legal review where directed by your Company contact.

Promotions, Giveaways, Contests and Other Promotions

Do not conduct promotions, sweepstakes, contests, giveaways, charitable promotions, or similar activities involving Company products or services without prior written approval from the Company. Any approved promotion must comply with applicable laws, platform rules, and Company instructions.

Do Not Send Messages on Company's Behalf Unless Expressly Requested

Unless expressly requested and authorized by the Company, do not send emails, direct messages, private messages, or other communications on the Company's behalf. If the Company asks you to send communications about the Company or its products or services, this Policy applies and the communication must include any disclosures or language required by the Company.

Respect Intellectual Property Rights

Intellectual property rights are a group of legal rights that protect creative works, brands and inventions. These rights include copyrights, trademarks, patents, trade secrets, as well as the right to use someone's name, likeness or voice (or "publicity rights"). Examples of works protected by intellectual property include photographs, videos, music, trademarks and logos, writings, a person's image, websites, etc.

Use Company intellectual property only with the Company's express written permission and do not alter or modify Company logos, trademarks, copyrighted materials, or other intellectual property. Only use third-party intellectual property with permission or when otherwise permitted by law. If you are unsure whether a proposed use is permitted, consult your Company contact or appropriate legal counsel before publishing.

Do Not Disclose Any Company Confidential Information

If you receive or become aware of information about the Company, its products, services, business operations, financial performance, customers, partners, suppliers, employees, systems, plans, or other non-public matters, do not include that information in your content or otherwise disclose it without authorization. If you have any question about whether information is confidential, contact the Company before disclosing it or err on the side of caution and do not disclose it. Refer media inquiries regarding the Company, its products, or services to the Company contact identified for the engagement or to the appropriate public relations contact.

Do not cite, identify, or refer to Company customers, vendors, business associates, investors, or other third parties, or reveal confidential information about them, without prior written permission.

You Are Personally Responsible for Your Actions

You are personally responsible for your actions and omissions related to content you create, publish, or share. Follow this Policy, all applicable laws and regulations, platform terms, and any Company instructions.



The Company may hold you responsible for claims, losses, or liabilities arising from your violation of the law, this Policy, Company rights, or third-party rights. By creating content at the Company's request or accepting an incentive from the Company, you agree to indemnify and hold harmless the Company, its parents, affiliates, and subsidiaries from liability arising from the foregoing.

Remove or Correct Content When Requested

By creating content at the direct request of the Company or accepting any incentive from the Company to create content, you agree to promptly remove, correct, or update content if the Company notifies you that it is inaccurate, objectionable, non-compliant, or otherwise inconsistent with this Policy. Even without notice from the Company, promptly remove or correct content if you receive a legitimate complaint or become aware that the content may violate intellectual property rights, privacy rights, platform rules, laws, regulations, or this Policy.

Compliance

Failure to comply with this Policy may result in termination of the engagement, removal or correction of content, withholding of compensation where permitted by the engagement terms, or other action available to the Company. This Policy may be changed at any time and is subject to applicable law.

If you have questions about this Policy, please ask your Company contact.

Reporting concerns

A number of avenues are available to report any misuse of social media, including contacting through Gen Digital's [EthicsLine](#), for compliance matters, or contacting HR for employment matters. You may also report any misuse directly to CorporateMarketing@GenDigital.com.



Related Policies

Additional policies and guidelines may intersect with this policy and may include (but are not limited to):

- [Gen Digital Code of Conduct](#)
- [Intellectual Property Policy](#)
- [Insider Trader Policy](#)
- [Global Personal Data Handling Policy](#)
- [Global Privacy Policy](#)
- [Internal Social Media Policy](#)

Approval Matrix

Policy Managers	Bryan Zhao - Lead Corporate Counsel
Policy Approver	Amir Amiri - Associate General Counsel
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