# **Gen Global Human Rights Policy**



# **Guiding Principles**

Gen supports and respects internationally recognized human rights and labour standards as proclaimed in the Universal Declaration of Human Rights, the International Labour Organization's Core Conventions, the International Covenants on Civil and Political Rights and on Economic, Social, Cultural Rights and the United Nations Guiding Principles on Business and Human Rights. We are a signatory to the United Nations Global Compact (UNGC).

Our commitment to respect human rights is embedded in the company's Code of Conduct Gen respects the dignity of others and expects our employees and vendors to comply with the policies outlined in the company's Code of Conduct. Gen commits to proactively avoid human rights abuses and complicity in the abuses of others through due diligence procedures.

# **Policy**

### **Priority Human Rights Areas**

Inclusion & Diversity: Gen is committed to building an inclusive, diverse workforce. We celebrate diversity as a driver of innovation and know that diverse points of view help us make products and services that meet the needs of the broad spectrum of people we serve. This starts with ensuring a culture where people of every race, ethnicity, age, sexual orientation, disability, background, and experience are respected and encouraged to thrive. We believe that a work environment where people can be their authentic selves can help amazing things come to life. We care about transparency and share our challenges, and action plans for continual improvement with our employees and stakeholders. See Our Social Impact Report for more details.

Equality Opportunity: At Gen we believe in equal pay for equal work, in FY20, global representation increased to 31% female, and in the U.S underrepresented minorities represented 10.8% of our workforce. As a standalone consumer business, we are in the process of establishing our baseline representation and look forward to sharing our first full year of diversity, equity and inclusion data.

Harassment Free Environment: We believe everyone has the right to be treated with dignity and respect. We strive to create supportive, harassment-free work environments. See Global Code of Conduct for more information.

Privacy: Privacy is a fundamental human right and protecting personal data—whether our own, our customers', or our partners' is part of our commitment to corporate responsibility. Gen is committed to complying with applicable legal requirements, and continuously enhancing our privacy and security practices across the globe. We are dedicated to transparency every step of the way. We provide a Global Privacy Statement to explain the company's personal data processing practices.

Responsible Sourcing: Gen supports the dignity and equality of all human beings. We believe that human trafficking, slavery, child labour, and unsafe and unfair work practices have no place in our global society. We make sure we safeguard human rights every step of the way. We expect our suppliers to adhere to the standards in Global Supplier Code of Conduct.

### **Exceptions**

Where local law and international law is in conflict, we comply with local law.

### **Compliance**

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Gens' Board of Directors, Nominating and Governance Committee, has responsibility for oversight of the company's corporate responsibility effort which includes this Human Rights Policy. The Ethics Team has day to day responsibility for the implementation of this policy.

Gen provides training to all employees through an annual Code of Conduct training program.

## Reporting concerns

- If you believe this Policy may have been violated, immediately submit a confidential report to the Office of Ethics and Compliance online through Gen's EthicsLine, over the phone (US/Canada 1.866.833.3430, international numbers listed on EthicsLine), or via e-mail. Reports may be made anonymously through EthicsLine online.
- You may also choose to report your concern to you manager or HR. Managers have a responsibility to ensure that all reports are escalated and responded to appropriately.
- Gen will not tolerate retaliation against anyone, who in good faith, reports a concern or cooperates with a compliance investigation, even when allegations are found to be unsubstantiated.

### **Translations**

This policy is available in xxx (add links once complete)

### **Related Policies and Information**

Universal Declaration of Human Rights <a href="http://www.un.org/en/universal-declaration-human-">http://www.un.org/en/universal-declaration-human-</a> rights/index.html

The International Labour Organization's Core Conventions <a href="http://www.ilo.org/ilolex/english/convdisp1.htm">http://www.ilo.org/ilolex/english/convdisp1.htm</a>

The United Nations Guiding Principles on Business and Human Rights

http://www.unglobalcompact.org/Issues/human rights/The UN SRSG and the UN Global Compact.html

United Nations Global Compact (UNGC) https://www.unglobalcompact.org/

UNGC Lead Program http://www.unglobalcompact.org/howtoparticiate/lead/index.html

Code of Conduct https://www.nortonlifelock.com/us/en/legal/code-conduct/

## **Approval Matrix**

Policy Manager	Amanda Davis
Policy Approver	Kim Allman
Last Revision Date	2023
Effective Date	2023

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