



## Commonly Asked Questions

### Who may report a concern?

Anyone may report a concern related to potential misconduct involving Gen including a Gen employee, contractor, supplier, channel member, or customer.

### Why has Gen contracted with EthicsPoint for reporting of concerns?

EthicsPoint is an independent company that provides secure, confidential telephone and web-based systems for use by those who wish to report a concern regarding business conduct. Gen is one of many companies that contracts with EthicsPoint for this service in the belief that potential reporters will be more comfortable reporting a concern if they know they will be reporting to a professional, third-party. In addition to providing service 24 hours a day, EthicsPoint offers translation services that allow telephone and web reports to be made in dozens of languages.

### What is EthicsPoint's role?

EthicsPoint's principal responsibilities are:

- ✓ Provide confidential telephone and web-based options for reporters to state concerns about Gen's business conduct
- ✓ Protect the identity of reporters who wish to report anonymously
- ✓ Provide translation services for those reporters who wish to report in languages other than English
- ✓ Transmit information about the concern to Gen's Ethics and Compliance team so the company can conduct an appropriate investigation
- ✓ Allow Gen to communicate with an anonymous reporter by serving as an intermediary which can relay follow-up questions and answers, as well as information about the resolution of the case.

It is not EthicsPoint's role to take action to address the concern, only to transmit the concern to Gen's Ethics and Compliance team.

### What if this is an emergency?

Concerns about an immediate threat of physical harm or damage to property should not be reported to EthicsPoint. If you require emergency assistance, please contact your local emergency services.

### Should I report my concern through EthicsPoint or my Gen manager or human resources representative?

First consider whether you are comfortable raising your concern directly, such as to your manager, your manager's manager, or to someone else in your department. Individuals within the company have indicated that, while sometimes challenging, directly addressing issues and or concerns with those involved can be very effective. You may also report your concern to Ethics and Compliance at [XRM-ethicsandcomplnc@Gendigital.com](mailto:XRM-ethicsandcomplnc@Gendigital.com) or, if you believe there has been any



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violation of Gen's accounting practices, securities laws or legal requirements, or if there are any issues that you believe should be brought to the attention of Gen's Audit Committee of the Board of Directors. If you are uncomfortable reporting your concern, if you do not know whom to contact, if you believe your concern has not been satisfactorily addressed, or if you wish to remain anonymous, you may file a report through EthicsPoint.

In addition, individuals who have a concern regarding a breach of certain EU laws – particularly those related to product safety and compliance, consumer protection, public procurement, financial services products and markets, environmental protections, transport safety, and protection of privacy and personal data, among others (as outlined in more detail in the addendum) – may also choose to have their concerns submitted through EthicsPoint transmitted only to a local investigations team if desired.

### How can I report my concern to EthicsPoint?

If you wish to report a business conduct concern involving Gen, **you** may complete a report on this website, or you may speak with a specialist in EthicsPoint's call center, which answers calls to Gen's EthicsLine. If your concern involves a breach of EU law or conduct that occurred in the EU, additional information regarding Gen's local reporting channels and the types of claims that may be submitted can be found at the end of this document. Regardless of which option you select, you may choose to remain anonymous, if you wish to do so.

To contact Gen's EthicsLine, click [here](#) for a list of applicable contact telephone numbers. In most countries, Gen offers a telephone number you can call at no cost to you. In most cases, the EthicsLine will initially be answered in English. The EthicsLine specialist who answers your call will bring an interpreter on the line if you would prefer to report your concern in a language other than English. You can reach a live operator 24 hours a day. You may also submit a report through the EthicsPoint web-based form – found at [gen.ethicspoint.com](http://gen.ethicspoint.com) – in the language of your choosing.

### Should I identify myself?

If you choose to identify yourself in reporting your concern, Gen **will** make every reasonable effort to hold your name in confidence during the investigation. Investigations may be more quickly and effectively completed when the reporter is identified because it allows Gen's investigator to follow up directly with the reporter.

### What should I include in my report?

When raising a concern, please make your report as specific as possible. To the extent you are able to do so, it is helpful if your report includes the following details:

- ✓ The nature of the concern or potential wrongdoing you are reporting;
- ✓ Where and when the relevant events occurred;



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- ✓ To the extent known, who is involved and who else might have knowledge of the matter you are reporting;
- ✓ If you suspect wrongdoing, how you believe the suspected wrongdoing was committed; and
- ✓ Any documents or other sources that would support the information in your report and/or aid in any subsequent investigation.

### **May I report my concern anonymously?**

In all countries except those which prohibit anonymous reporting, you may report your concern anonymously by using either the web-based form or Gen's EthicsLine, which is operated by EthicsPoint. You may also report anonymously via applicable local reporting channels. If you choose to make your report anonymously, you will be provided with a report key and asked to create a password. You will need to retain these to return to the report you previously submitted. When you check back, you can monitor the progress on your concern and add additional information, if necessary. This will also allow Gen to ask follow-up questions, while protecting your anonymity.

If you choose to report anonymously, please take care not to report information that may personally identify you, such as:

- ✓ Your reporting relationship to others in the company
- ✓ Your physical work location

### **How does EthicsPoint maintain confidentiality?**

EthicsPoint does not trace phone calls or use Caller Identification. In addition, EthicsPoint does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to EthicsPoint would be available if you choose to make a report online. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names.

In addition, regardless of how you choose to raise your concerns, your report and your identity (should you choose to share it) will be kept confidential to the extent permitted by law. Relevant information will only be disclosed to individuals trained to respond to your concern and those with a need to know in order to properly address the concern. In all cases, information gathered will be processed and handled in accordance with Gen's Privacy Policy and local law.

### **How can I monitor progress on my concern?**

At the end of your telephone call or web-based report, EthicsPoint will provide you with a report key and ask you to create a password. You will be asked to telephone Gen's EthicsLine, operated by EthicsPoint, or visit the EthicsPoint website 7-10 business days after you make your initial report. At that time, you can monitor progress on your report and learn whether any additional information is needed from you to address your concern.



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### **What should I do if I lose my Report Key or password?**

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to another report you supplied earlier.

### **How does Gen review concerns?**

EthicsPoint notifies Gen's Ethics & Compliance team when a concern is received, unless you indicate you wish to have your concern shared only with the relevant local team (where permitted by law to do so). When warranted, Gen then commences an appropriate investigation, using internal or external resources with expertise in conducting investigations. The information in your report is shared with appropriate investigation team members, and the concern is investigated promptly and discreetly. If you report locally, your report will be responded to in accordance with local requirements. You are able to monitor status of the investigation by contacting Gen's EthicsLine, or by clicking the Follow Up link on the website.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within Gen's Ethics & Compliance team who are charged with evaluating the type of violation and location of the incident and ensuring that an appropriate investigation is conducted. Where permitted by local law, if you choose to only share your concerns with the local team tasked with evaluating and investigating concerns in the applicable country, EthicsPoint will similarly ensure your report is only accessible to the local team. In all instances, individuals receiving these reports have had training regarding how to handle these reports and will treat them with the utmost confidence.

### **What if I face retaliation?**

Gen strictly forbids any retaliation against any person who reports a concern. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct or result in any corrective action. If you believe you have faced retaliation of any kind, please report it so that Gen can investigate.

Please note that this does not prevent Gen from taking appropriate disciplinary action against anyone who is found to have violated a law, regulation or Gen's policies or procedures, even if that person initiated the initial report to Gen or participated in the investigation of it.

### **Does management really want me to report?**

They certainly do. In fact, they need you to report. Your willingness to report a problem or concern translates into an opportunity for the company to be better. Reporting a concern can minimize the potential negative impact on the company and our customers, and, most importantly, help to alleviate a difficulty you might be facing.

Also, offering input may help identify issues that can improve corporate culture and the company's overall performance. If you observe or suspect a violation of company policy or of the law, as an employee, you have the obligation to speak up. Please do not assume that someone



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else is going to raise the concern. Unless you speak up, the company may not have the chance to investigate and address the situation.



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### Addendum - Local European Union Reporting Channels

Gen is in the business of protection. This doesn't just mean protecting the digital lives of our customers, but also each other and our business. This addendum covers workers in the European Union who acquire information or have concerns regarding certain violations of law or policy (as described below) who wish to make a report to a specially designated local in-country contact rather than reporting via their manager, the central EthicsPoint channels, Gen's central Ethics and Compliance team, or Gen's Audit Committee. "Workers" include (except where local law may differ as noted below): an individual who is or was an employee of Gen; contractors; sub-contractors; volunteers; paid or unpaid trainees; agency workers; self-employed individuals; shareholders; members of Gen's administrative, management, and supervisory bodies (including non-executive members); anyone working under the supervision and direction of contractors, subcontractors, and suppliers; and anyone in any of the prior categories whose work-based relationship with Gen is yet to begin or has handed.

#### **What types of matters can I opt to have reported to my local in-country contact under the EU Whistleblowing Legislation?**

Good faith concerns regarding any of the following areas, may be reported:

- Public procurement
- Financial services, products and markets
- Prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety
- Animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data
- Security of network and information systems
- Breaches affecting the financial interests of the EU
- Breaches related to the EU internal market, including breaches of competition and state aid rules and rules on corporate tax (including tax arrangements)

Certain jurisdictions may permit additional concerns to be reported – as noted for each relevant jurisdiction, below.



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All other concerns should be reported through Gen's normal established reporting channels, including the central EthicsPoint channels, as described in the Commonly Asked Questions and Gen's Code of Conduct. However, the most important thing is to ensure you report your concerns – Gen has processes in place to ensure your concerns are routed and handled appropriately no matter how they are raised.

### **Will I be informed about the investigation and outcome?**

If you make a report, you will receive a receipt of the report within seven days at latest and it will be promptly reviewed by our trained teams. We aim to ensure that we complete all investigations within three months and we will respond and give feedback to the individual who raised the concern within the aforementioned time frame.

### **Will Gen retain documentation of my report indefinitely?**

According to European law all incoming reports shall be documented in a permanently retrievable manner in compliance with the confidentiality requirement. Generally, Gen does not retain documentation of reports or related investigations for longer than is required by law.

### **How do I ensure my report is routed to my local in-country contact, rather than Gen's central Ethics and Compliance Team?**

Gen believes that raising concerns through its central reporting channels is the most appropriate and efficient course of action for you to take. However, if you feel you cannot raise your concerns in this way, you may also report to your local in-country contact as described in further detail, by country, below.

If you choose to make an oral report or report in person, the local in-country contact designated to carry out this function shall either record the conversation or draft a complete and accurate transcript of the conversation. You will be given the opportunity to check, correct, and ensure the accuracy of the written transcript of the conversation.

While Gen is confident that any concerns raised internally – either through Gen's central channels or your local in-country contact – will be handled appropriately and in compliance with all applicable laws, you may also consider reporting to a competent external authority, as indicated below. Nevertheless, Gen strongly encourages you to use internal routes first.

### ***Czech Republic***

Reports related to potentially unlawful conduct in any of the areas outlined above are subject to the Czech Whistleblowing Legislation, as well as reports related to the following subject areas:

- Violations of Czech criminal law;
- Any conduct involving an administrative offence punishable by a fine of at least CZK 100,000; and



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- Any conduct in breach of the Czech Whistleblowing Legislation.

In the Czech Republic, Gen has designated Ondrej Kramolis as the competent person(s), as defined by Czech law, to handle reports subject to the Czech Whistleblowing Legislation.

Should you choose to share your concern with Ondrej Kramolis, you may make your report orally, in writing, or in person. Gen accepts reports of concerns from employees, as well as third parties. However, Czech law does not permit reports being made under the Czech Whistleblowing Legislation to be submitted anonymously. You must specify at least your full name, date of birth or other information which makes it possible to identify you. If you wish to report anonymously, you may still do so by sharing your concerns through Gen's central reporting channels.

- To make an oral report by telephone hotline
- To make a written report by Ethicsline
- To make a report in person please request a physical meeting with Ondrej Kramolis

The external authority designated to receive reports related to the topics above is the Ministry of Justice. The contact details are:

Email: [oznamovatel@msp.justice.cz](mailto:oznamovatel@msp.justice.cz)

Phone: 00 420 221 997 840

Website: <https://oznamovatel.justice.cz/chci-podat-oznameni/>

### Germany

Reports related to potentially unlawful conduct in any of the areas outlined above are subject to the German Whistleblower Protection Act, as well as reports related to additional subject areas including:

- Violations of German criminal laws;
- Violations of any law aimed at protecting the life, health, or bodily integrity of people or the rights of employees, to the extent such violations are punishable by fines;
- Violations of laws regulating the rights of stockholders in stock corporations; and
- Violations of tax laws.

A list of all subject matters covered by the German Whistleblower Protection Act can be found in Section 2 of the law, which can be accessed [here](#).

In Germany, Gen has designated Kelly McMorrow to handle reports subject to the German Whistleblower Protection Act. You may make your report orally, in writing, or in person and you have the option to make your report anonymously, if you should choose to do so.

- To make an oral report by telephone hotline

**Commented [OC1]:** Please note that the "competent person" must be briefed by GEN on his/her rights and obligations under the Whistleblower Protection Act and a record of this briefing must be made. We can prepare a template of this record if you require.



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- To make a written report by Ethicsline
- To make a report in person please request a physical meeting with Kelly McMorrow

The external authority designated to receive reports generally related to the topics above is the Bundesamt für Justiz (Federal Office of Justice). The Federal Office of Justice's contact details are:

Bundesamt für Justiz  
Externe Meldestelle des Bundes  
53094 Bonn  
Email: [hinweisgeberstelle@bfj.bund.de](mailto:hinweisgeberstelle@bfj.bund.de)  
Phone: +49 228 99 410-6644  
Website:

<https://formulare.bfj.bund.de/ffw/form/display.do?%24context=376FFEC9515FDB49D5FA>

The Federal Financial Supervisory Authority is designated to receive reports concerning regulated financial services. The contact details are:

Bundesanstalt für Finanzdienstleistungsaufsicht  
Hinweisgeberstelle  
Graurheindorfer Straße 108  
53117 Bonn  
Phone: 0228/ 4108-2355  
Website:

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BaF6&c=-1&language=eng>

Reports related to cartel violations may be submitted to the Federal Cartel Authority:

[https://www.bundeskartellamt.de/EN/Banoncartels/Whistle-blower/whistle-blower\\_artikel.html?nn=3591568](https://www.bundeskartellamt.de/EN/Banoncartels/Whistle-blower/whistle-blower_artikel.html?nn=3591568)

### **Ireland**

Reports related to reasonable beliefs of potentially unlawful conduct in any of the areas outlined above are subject to the Irish Protected Disclosures Act, as well as reports related to additional subject areas including:

- Violations of criminal laws;
- Failure to comply with any legal obligation (other than an obligation arising under the worker's contract of employment or terms of engagement);
- Miscarriages of justice;
- An individual's health and safety is being or is likely to be endangered;
- Damage to the environment;
- Unlawful or improper use of public money;



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- Oppression, discrimination, gross negligence, or gross mismanagement by a public body; and
- Information tending to show that any matter related to these subjects has been, is being, or is likely to be concealed or destroyed.

In order for reports related to these topics to qualify as a “protected disclosure” under the Irish Protected Disclosures Act, the information that is reported must have come to your attention in connection with your employment at Gen. However, it is not a protected disclosure if it is your function (or that of Gen) to detect, investigate or prosecute the relevant wrongdoing, and the relevant wrongdoing does not involve an act or omission on the part of Gen.

In Ireland, Gen has designated Kelly McMorrow to handle reports subject to the Irish Protected Disclosures Act. You may make your report orally, in writing, or in person and you have the option to make your report anonymously, if you should choose to do so.

- To make an oral report by telephone hotline
- To make a written report by Ethicsline
- To make a report in person please request a physical meeting with Kelly McMorrow

The external authority designated to receive reports related to the topics above is the Protected Disclosures Commissioner. The Protected Disclosures Commissioner’s contact details are:

Protected Disclosures Commissioner  
Email: [info@opdc.ie](mailto:info@opdc.ie)  
Phone: 01 639 5650.  
Website: <https://www.opdc.ie/how-to-report-wrongdoing/>

You may also consider reporting to an external authority designated to receive reports, in Ireland that is a “Prescribed Person” under Irish law. A list of ‘prescribed persons’ is available [here](#).

Before making a disclosure to a Prescribed Person, you must reasonably believe that the information you are disclosing and any allegations contained in your report are substantially true, and the report must fall within the description of matters in respect for which the Prescribed Person or Commission has responsibility. Depending on the nature of the concern you may want to make a report to an institution, body, office or agency of the European Union.

### **Romania**

Reports related to potentially unlawful conduct in any of the areas outlined above are subject to the Romanian Whistleblowing Law, as well as reports related to additional subject areas including:



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- Violations of criminal laws; and
- Violations of tax laws

In order for reports related to these topics to qualify as a “protected disclosure” under the Romanian Whistleblowing Law, the information that is reported must have come to your attention in professional context, so meaning in connection with your employment at Gen.

In Romania, the Company has designated Cristina Soptelea to handle reports subject to the Romanian Whistleblowing Law. You may make your report orally, in writing, or in person and you have the option to make your report anonymously, if you should choose to do so.

- To make an oral report by telephone hotline
- To make a written report by Ethicsline
- To make a report in person please request a physical meeting with Cristina Soptelea

The external authority designated to receive reports generally related to the topics above is the National Agency for Integrity. The National Agency for Integrity’s contact details are:

National Agency of Integrity  
Email: [avertizari@integritate.eu](mailto:avertizari@integritate.eu)  
Phone: 0372 069 869  
Website: <https://www.integritate.eu/Contact.aspx>

Before making a report to the National Agency of Integrity, you must reasonably believe that the information you are disclosing, and any allegations contained in your report are substantially true.