



Political Contributions Policy

Global

Guiding Principles

Government policies affect the commercial environment. Symantec is subject to legislation and regulation that affects how we conduct business and generate value for our investors. Symantec engages in the political process with a view to the long-term interests of the company and to protect Symantec's interests.

Contributions

- Symantec established an independent entity, the Symantec Political Action Committee (SymPAC), through which all political contributions are made. SymPAC uses individual contributions from Covered Individuals to support selected Federal candidates and their campaigns. With the approval of the SymPAC Board and in coordination with Government Affairs, a division within the Legal and Public Affairs Department, SymPAC directs all political contributions and expenditures on behalf of the Company. Management reports these political contributions and expenditures to the Nominating & Governance Committee of the Board of Directors annually. SymPAC does not contribute to state and local candidates, and no other political contributions may be made or promised on Symantec's behalf.
- Among the factors that influence which candidates merit Symantec's financial support include:
 - Candidate support for key Symantec business and public policy priorities;
 - Candidate voting record and leadership position;
 - Candidate commitment to Symantec's industry growth, and ability to positively impact its goals; and
 - Symantec assets or employees in a region or state represented by the candidate.
- Symantec's political contributions are made in accordance with all applicable laws and regulations and political candidates and committees who receive contributions must report publicly the contributions they receive and their expenditures. Symantec does not allow use of corporate funds for political contributions.
- Any requests for contributions to a federal political candidate, committee, or party must be addressed to the SymPAC and to Government Affairs and must include an analysis of the four factors above, as well as business justification for the request to support the particular candidate, committee, or party.
- Additionally, no Symantec funds or other assets may be used for political contributions outside the U.S., unless expressly approved in advance and in writing by the SymPAC Board, Government Affairs, and the Office of Ethics and Compliance. A Symantec employee seeking approval for political contributions outside the U.S. must present, in writing, with all relevant information to allow for a thorough and careful analysis and will only be approved in exceptional circumstances. Among the information required is:
 - The name of the candidate, committee, or political party;
 - The government agency(ies) with which the candidate is or has been affiliated (e.g., has the candidate served with the Ministry of Interior and in what period of time);



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- The candidate's position on key issues that affect Symantec's business (e.g., human rights, equality, labor laws, unionization, taxes, foreign investment, etc.);
 - The candidate's voting record on the issues affecting the Company;
 - Whether Symantec does business with the government entity with which the candidate is seeking a position and the amount of such business in the preceding 24 months;
 - Any pending or recently awarded contracts with the government entity with which the candidate is affiliated or is seeking a position;
 - Any pending or recently awarded contracts overseen or managed by the committee, party, or political entity for which the political contribution is sought; and
 - The business justification for making the political contribution.
- Moreover, any affiliation between a Covered Individual and the candidate, committee, or political party for which the contribution is sought must be disclosed fully and truthfully when seeking approval for the contribution.
 - It is illegal for Symantec to reimburse expenses for political contributions and the Company does not reimburse directly or through compensation increases for personal political contributions. Symantec prohibits Covered Individuals from exerting pressure or undue influence over Symantec employees, agents, consultants, or representatives to make personal political contributions. Moreover, the Company prohibits any retaliatory action against Covered Individuals who choose not to make political contributions.
 - Covered Individuals are not permitted to use Symantec's resources or assets (including work time) to support candidates or campaigns personally. Nor are Covered Individuals permitted to create the impression that personal political activities are undertaken on behalf of Symantec or reflect the opinion of Symantec.
 - In the course of employment, Covered Individuals are prohibited from engaging in any activity on Symantec's behalf that is intended to influence legislation, rulemaking, or governmental policy or engage lobbyists or others to do so, without pre-authorization of Government Affairs.
 - Political contributions cannot be used to disguise a payment that is otherwise prohibited by Symantec's [Code of Conduct](#), Global Anti-Corruption Policy, or other policies or procedures. If Symantec's policies prohibit the payment in another form, it cannot be made under the guise of a political contribution. Covered Individuals cannot utilize Third Parties or their own personal funds to make a payment that cannot be made under Symantec's policies and procedures.

Disclosure & Reporting

- Symantec discloses all political contributions on its public website. In addition to supporting political candidates, Symantec belongs to various technology trade organizations that focus on matters concerning the Company's interests and interact with government officials. The Company publicly discloses the portion of its membership dues or payments that are used for political lobbying. Management reports the Company's membership and participation in these organizations and other political activities to the Nominating & Governance Committee of the Board of Directors annually.



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Exceptions

- This policy is intended to provide clear policies/procedures and in some areas general guidelines for when political contributions may be made in the course of Symantec business. The General Counsel or Office of Ethics and Compliance, in coordination with Government Affairs, must approve all exceptions to this policy.

Definitions

- **Covered Individuals:** All Symantec directors, officers, employees, representatives, distributors, partners, resellers, and others acting on behalf of the Company, including its subsidiaries.
- **Government Officials:** Includes all persons that represent or act, directly or indirectly, on behalf of a government entity. By way of example, it includes:
 - The children, spouse, partner and other close relatives of a Government Official;
 - Uncompensated honorary officials whose duties are merely ceremonial, if such officials have actual influence in the award of business;
 - Members of royal families who may lack “official” authority but maintain ownership or managerial interests in government industries or government controlled companies;
 - Employees, representatives, agents, and other individuals who act for, or on behalf of, an entity that is wholly or partially owned or controlled by the government, such as telecommunications companies in the process of privatization, banks that received federal bail-out funds and are majority owned by a government, state-owned hospitals or universities, etc.;
 - Candidates for political office and political parties or any of their officials;
 - Elected officials, civil servants, and military personnel;
 - Officers, employees, or representatives of public international organizations, such as the World Bank, the United Nations, the Red Cross, and the Olympic Committee;
 - An officer or employee of a government or a person acting in an official capacity on behalf of a government.
 - The definition is broad and includes entities which may not, on their face, appear to be government entities, and which may not be considered government entities under the procurement or other laws of the country in which they are doing business.
- **Political Contributions:** Political contributions include monetary and non-monetary items, such as equipment loans or donations, free technology services, and an individual’s time given towards a political contribution. Additionally, some campaign laws treat the use of corporate resources (i.e., email, stationery, personnel time) as corporate political donations.
- **Third Parties:** All Symantec directors, officers, employees, and others acting on behalf of the Company, including its subsidiaries.

Compliance

- Anyone employed by Symantec determined to have engaged in violations of this Policy will be subject to appropriate disciplinary action, up to and including immediate termination.



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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 Symantec'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.
- Alternatively, you may report your concern to you manager. Managers have a responsibility to ensure that all reports are escalated and responded to appropriately.
- Symantec 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.

Related Policies and Information

- [Code of Conduct](#)
- Global Anti-Corruption Policy

Approval Matrix

Policy Manager	Jeff Greene, Director of Government Affairs
Policy Approver	Carolyn Herzog, Chief Compliance Officer and Vice President of Legal & Public Affairs
Last Revision Date	September 15, 2016
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