RULE 10B5-1 TRADING PLANS POLICY
September 29, 2025

INTRODUCTION

Securities and Exchange Commission ("SEC") Rule 10b5-1 provides that if an individual sells stock pursuant to a trading plan meeting the requirements of such rule (a "Rule 10b5-1 Plan"), the individual will have an affirmative defense against alleged violations of U.S. federal insider trading laws. The purpose of the rule is to permit individuals to develop plans for the orderly liquidation of their stock positions within the legal requirement that investors cannot trade while in possession of material nonpublic information. A Rule 10b5-1 Plan permits trades to occur notwithstanding a trading black out or possession of material nonpublic information by the insider at the time of the trade, provided that any trade is made pursuant to a valid Rule 10b5-1 Plan, which is established at a time when the individual was not in possession of material nonpublic information about Gen Digital Inc. (the "Company") and otherwise complies with the requirements of Rule 10b5-1. Rule 10b5-1 Plans are typically administered by the holder's broker or financial advisor.

It is the policy of the Company that Pre-clearance insiders (as defined in the Company's Insider Trading Policy) may conduct open market transactions in the Company's securities only through use of a Rule 10b5-1 Plan or pre-clearance of such transactions by the Company's General Counsel or Head of Legal Operations.

As set forth in the Company's Insider Trading Policy, the Company must pre-clear all Rule 10b5-1 Plans adopted by Pre-clearance insiders. To assist Pre-clearance insiders and their brokers or financial advisors in developing Rule 10b5-1 Plans that are consistent with the interests of the Company, this document describes those provisions that must be included in any Rule 10b5-1 Plan that is subject to pre-clearance by the Company under its Insider Trading Policy.

In December 2022, the SEC issued final amendments to Rule 10b5-1 which, among other things, added new conditions to the availability to the rule's affirmative defense and imposed disclosure requirements for members of the board of directors and Section 16 officers. This policy has been updated to reflect those amendments, which became effective as of February 27, 2023. Any Rule 10b5-1 Plans adopted prior to that date are subject to the SEC's prior guidance on the rule, except that any modification to the amount, price or timing (or to a written formula, algorithm or computer program affecting the among, price or timing) of the purchase or sale of securities under such plans will be deemed to be a termination of such plan and adoption of a new Rule 10b5-1 Plan, which would then be subject to the SEC's current guidance.

PRE-CLEARANCE OF RULE 10B5-1 PLANS FOR ACCESS PERSONS

The Company's Insider Trading Policy requires that, before a Rule 10b5-1 Plan may be adopted by a Pre-clearance insider, the Company's General Counsel or Head of Legal Operations must receive a copy of the plan and they (or their delegate) must pre-clear the form of the plan. In addition, the Pre-clearance insider requesting such pre-clearance (the "Pre-Clearance Access Person") is also required to submit a Rule 10b5-1 pre-clearance application to the Company's General Counsel or Head of Legal Operations and receive pre-clearance from them or their delegate prior to execution of the Rule 10b5-1 Plan. Any proposed modification or termination of the Rule 10b5-1 Plan must be submitted to the Company's General Counsel or Head of Legal Operations and cleared by them or their delegate prior to modification or termination.

REQUIRED ELEMENTS OF RULE 10B5-1 PLANS FOR PRE-CLEARANCE INSIDERS

All Rule 10b5-1 Plans to be adopted by Pre-clearance insiders must comply with the following requirements:

1. *Compliance with Rule 10b5-1(c).* All Rule 10b5-1 Plans must be in writing and comply with the requirements of Rule 10b5-1(c), including the following:

   <u>Entry into Rule 10b5-1 Plans</u>.

   - At the time of entry into or modification of the Rule 10b5-1 Plan, the Rule 10b5-1 Plan must include a representation that as of the date of the adoption (or modification) of the Rule 10b5-1 Plan, the Pre-Clearance Access Person (i) is not aware of any material nonpublic information, and (ii) is entering the Rule 10b5-1 Plan in good faith and not as part of a plan or scheme to evade insider trading laws.
   - The Rule 10b5-1 Plan may not be adopted or modified during a trading blackout by the Company, and must be adopted or modified at a time when the individual is not in possession of any material nonpublic information about the Company at the time of the scheduled transaction.
   - The Rule 10b5-1 Plan must either (1) specify the date(s) on which a set amount of securities are to be bought or sold and at what price; (2) provide a formula or algorithm for determining the amount of securities to be purchased or sold and the price and date on which the securities were to be purchased or sold; or (3) delegate all decision-making authority about such matters to someone without material nonpublic information regarding the Company.
   - The Rule 10b5-1 Plan must be entered into in good faith and not as part of a plan or scheme to evade Rule 10b5-1 and the Pre-clearance insider must act in good faith throughout the duration of the Rule 10b5-1 Plan.
   - The Rule 10b5-1 Plan must provide appropriate mechanisms to ensure that the Pre-clearance insider complies with all applicable rules and regulations.

   <u>Cooling off Period</u>.

- For all Pre-clearance insiders, Rule 10b5-1 Plans are subject to a cooling-off period between the date the Rule 10b5-1 Plan is adopted or modified and the first transactions under the Rule 10b5-1 Plan. This cooling off period runs through the expiration of a period consisting of the later of: (1) 90 days after the Rule 10b5-1 Plan is adopted or modified, or (2) two business days following the filing of the Company's Form 10-Q or Form 10-K for the fiscal quarter in which the Rule 10b5-1 Plan was adopted or modified (but not to exceed 120 days following the date the Rule 10b5-1 Plan was adopted or modified).

<u>Multiple Rule 10b5-1 Plans</u>.

- A Pre-clearance insider may not enter into more than one Rule 10b5-1 Plan at a time, except as expressly permitted by Rule 10b5-1. If a Pre-clearance insider has multiple Rule 10b5-1 Plans related to the Company's securities, the pre-Clearance insider may not begin trades under a new Rule 10b5-1 Plan until the prior Rule 10b5-1 Plan is completed or expired.

<u>Concurrent ESPP Quick Sale Program Participation</u>

- Pre-clearance insiders may not concurrently participate in the Company's Employee Stock Purchase Plan (ESPP) Quick Sale Program and maintain an active Rule 10b5-1 Plan. If a Pre-clearance insider is enrolled in the ESPP Quick Sale Program, they must revoke such election in accordance with the Company's Employee Stock Purchase Plan Quick Sale Authorization & Agreement before adopting or modifying a Rule 10b5-1 Plan. Conversely, if a Pre-clearance insider has an active Rule 10b5-1 Plan in effect, they may not elect to participate in the ESPP Quick Sale Program until the 10b5-1 Plan has terminated or expired in accordance with its terms.

<u>Single-Trade Plans</u>.

- Generally, the Pre-Clearance Access Person may only adopt one single-trade Rule 10b5-1 Plan during any 12-month period. A single-trade plan is a Rule 10b5-1 Plan that is designed to effect an open market trade of the total amount of securities in a single transaction.

<u>Modification</u>.

- A modification to an existing Rule 10b5-1 Plan is considered a termination of such plan and the adoption of a new Rule 10b5-1 Plan, which requires the application of the requirements set forth above that apply to adopting a new plan (for this purpose, a modification includes a modification to the amount, price or timing of the purchase or sale of the securities or a modification to a written formula/algorithm that affects the amount, price or timing of the purchase or sale of the securities).

<u>SEC Disclosure</u>.

- The Company is required to disclose certain information when directors or executive officers adopt, modify or terminate a Rule 10b5-1 Plan in its Quarterly Reports on Form 10-Q and/or Annual Reports on Form 10-K. This information includes the name and title of the director or executive officer, the date of the adoption, modification or termination of the Rule 10b5-1 Plan, the duration of the Rule 10b5-1 Plan, and the aggregate number of securities to be traded under the Rule 10b5-1 Plan.

No Hedging Transactions.

- The Pre-clearance insider must not enter into or alter a hedging transaction or position with respect to securities covered under the Rule 10b5-1 Plan.

2. *Disclosure.* Forms 4 filed by the Company on behalf of a director or executive officer will check to the box to indicate that the transactions have been effected in accordance with a Rule 10b5-1 Plan disclose the date of plan adoption. Directors and executive officers will be responsible for filing all Forms 144, which should indicate that the transactions have been effected in accordance with a Rule 10b5-1 Plan.

3. *Lock-Ups and Restrictions on Trades.* A Rule 10b5-1 Plan must provide a mechanism for cessation of transactions under the plan if the broker or Pre-clearance insider becomes subject to a legal, regulatory or contractual restriction or undertaking (other than any such restriction relating to the Pre-clearance insider's possession or alleged possession of material nonpublic information about the Company) that would prevent the broker (or other sales agent) from making sales pursuant to the plan (e.g., if an officer is requested to sign an affiliate lock-up in connection with a public offering of company securities). The plan must also allow the Company to bar trades in the Company's securities and include appropriate arrangements for notification to the broker or investment advisor.

4. *Notification to the Company of all Trades by Directors and Executive Officers.* For Rule 10b5-1 Plans adopted by directors or executive officers, the Rule 10b5-1 Plans must require the broker or financial advisor to notify the Company of any trades by directors or executive officers within 24 hours of the trades. This notification is necessary for the Company to make any required filing under Section 16 on behalf of such directors or executive officers. Contact information for notifications is maintained by, and should be obtained from, the General Counsel or Head of Legal Operations (or their delegate).

5. *Compliance with Rule 144 and Section 16 for Trades by Directors and Executive Officers.* For directors and executive officers of the Company, the Rule 10b5-1 Plan must require compliance with the requirements of Rule 144 and Section 16. Directors and executive officers will be responsible for filing all such Forms 144 and Forms 4, although the Company will assist in the filing of Forms 4 provided that such information is provided on a timely basis to the Company. See also Section 2 for required disclosure on all Forms 144 and Forms 4.

6. *No Company Obligations.* The Rule 10b5-1 Plan cannot require the Company to be a party to, or make any representation or covenant as part of, the Rule 10b5-1 Plan, and cannot require the Company to indemnify any party for any matter relating to the Rule 10b5-1 Plan. The person trading in the Company's securities under any such

agreement or Rule 10b5-1 Plan shall be responsible for any failure to comply with the Rule 10b5-1 Plan.

RECOMMENDED ELEMENTS OF RULE 10B5-1 PLANS

The Company recommends, but does not require, that Rule 10b5-1 Plans comply with the following requirements:

1. *Avoid Trading Outside of Rule 10b5-1 Plans*. Pre-clearance insiders who have adopted a Rule 10b5-1 Plan should refrain from open-market purchases and sales of the Company's common stock outside of the plan. Even if a trading blackout is not in effect, trading outside of the plan could make it easier for regulators or securities class action plaintiffs to later argue that the Pre-clearance insider acted upon material nonpublic information.

   Please be advised that any open market trading activity outside of the plan is subject to the Insider Trading Policy, including the pre-clearance procedures for Pre-clearance insiders.

2. *Minimize Contact with Broker*. To comply with Rule 10b5-1, a Pre-clearance insider must not communicate any material nonpublic information about the Company to the broker or attempt to influence how the broker exercises his or her discretion in effecting trades. While it may be desirable for the Pre-clearance insider to delegate the actual timing of trades to a broker, the Pre-clearance insider should then minimize contact with the broker at least until after trades are completed in order to avoid any inference that material nonpublic information was communicated to the broker. The Pre-clearance insider may wish to use two brokers – one for trades under the Rule 10b5-1 Plan and another for stock trades in other companies.

3. *Regular Trading Patterns*. A Rule 10b5-1 Plan should structure sales to reflect a regular pattern of small trades over a longer period of time rather than relatively few larger sales. A regular pattern of small sales will minimize the inference that the Pre-c insider sought to exploit material nonpublic information and may avoid the occasional ill-timed high-volume sales around significant events.

4. *Avoid Modification or Termination of Rule 10b5-1 Plans.* It is recommended that the Pre-clearance insider not modify or terminate a Rule 10b5-1 Plan before the expiration of its scheduled term wherever possible. Multiple terminations could undermine the "good faith" requirement for Rule 10b5-1 Plans. Modifications could suggest that the Pre-clearance insider was trading on material nonpublic information under the guise of a trading plan. As a result, modifications should be limited to special circumstances such as death or the cessation of employment by the Company. However, no modifications may be adopted during a trading blackout by the Company or at a time

when the individual is in possession of any material nonpublic information about the Company.

QUESTIONS

Questions about this policy should be addressed to:

- Bryan Ko, Executive Vice President, General Counsel and Secretary, at 650.527.6634
- Whitney Clark, Head of Legal Operations at 650.930.0532

APPROVAL MATRIX

Policy Manager	Whitney Clark, Head of Legal Operations
Policy Approver	Bryan Ko, Chief Legal Officer
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