



# 2015 UN Global Compact LEAD Criteria Tables



# UN Global Compact LEAD Criteria Tables

The below tables present Symantec’s adherence to the UN Global Compact LEAD Criteria, including key activities and progress in FY15. The tables also provide links to additional information found on Symantec’s corporate website, the FY15 Corporate Responsibility Report and the FY14 Corporate Responsibility Report.

The tables are organized as follows:

- **Operations & Governance** (pp. 2–3); Criteria 1, 2, 19, 20, 21
- **Human Rights** (p. 4); Criteria 3, 4, 5
- **Labor** (p. 5); Criteria 6, 7, 8
- **Environment** (p. 6); Criteria 9, 10, 11
- **Anti-corruption** (p. 7); Criteria 12, 13, 14
- **Support for the UN** (pp. 8–9); Criteria 15, 16, 17, 18

Key:

Performance area addressed by the LEAD Criteria	
Global Compact Principles addressed by LEAD Criteria	
Names of UN Global Compact LEAD Criteria	
Our commitments and approach	
Key activities and progress FY15	Links to more information

## Operations and Governance

All 10 UN Global Compact Principles are related to these aspects of doing business

**Criteria 1: Describe mainstreaming into corporate functions and business units**

**Criteria 2: Describe value chain implementation**

### Our commitments and approach

**Symantec's Commitment to Corporate Responsibility:** Symantec is committed to prioritizing and appropriately positioning corporate responsibility (CR) within our company. The integration of CR will continue to be central to our business success and a cornerstone of value creation.

**Value Chain Perspective:** We continue to analyze our value chain, both upstream and downstream, evaluating annually risks, opportunities and impacts. Responsibility and expertise of the day to day management of our supply chain sustainability resides within each business unit.

**Commitment to the UN Global Compact 10 Principles within our company and throughout our supply chain:** We make sure that our employees, suppliers and business partners are fully aware of our policies and expectations. All of our employees take our Code of Conduct training and we require all our new suppliers to sign an agreement, which warrants that they will conduct business pursuant to the UN Global Compact's 10 Principles and to our Codes of Conduct.

### Key activities and progress FY15

Because our primary focus shifted to strategic and tactical planning for the split into two companies, Symantec's Corporate Responsibility Management and Accountability (CRM&A) project plans were placed on hold in FY15. We made significant progress in many ongoing priority issue areas and major initiatives, including:

- Devised vision, strategy and goals for Diversity and Inclusion at Symantec
- Developed policies, supplier engagement and policy implementation procedures in alignment with the [Electronic Industry Citizenship Coalition](#) (EICC) for our company and suppliers
- Filed our Conflict Mineral Report with the U.S. SEC for 2014
- Participation in various multi-stakeholder initiatives focused on driving positive CR impact
- Made measurable progress on environmental performance goals for our company and products

Further details of these and other key activities and progress are described in the following pages of this document as they correlate to additional UN Global Compact LEAD criteria.

### Links to more information

[FY15 CR Report, Approach to Corporate Responsibility p. 6](#)  
[2014 CR Report, p. 17, 46](#)  
[Managing Corporate Responsibility](#)  
[Corporate Responsibility FAQ](#)  
[Corporate Responsibility Snapshot](#)  
[Value Chain Map, 2014 CR Report, p. 13](#)  
[Conflict Minerals Policy](#)  
[Conflict Minerals Report](#)

## Operations and Governance

All 10 UN Global Compact Principles are related to these aspects of doing business

**Criteria 19: Describe CEO commitment and leadership**

**Criteria 20: Describe Board adoption and oversight**

**Criteria 21: Describe stakeholder engagement**

### Our commitments and approach

**CEO commitment to the United Nations Global Compact:** Symantec is fully committed to supporting UN Global Compact, its ten principles, and its activities. We participate in the UN Global Compact LEAD initiative; are members of the UN Global Compact U.S. Network and are a signatory of the Women's Empowerment Principles (WEP). We demonstrate leadership in CR by integrating CR in our strategy, operations and value chain.

**Board and executive CR involvement:** We set clear expectations for ethical and responsible operations at the Board and executive level. The Nominating and Governance Committee of our Board of Directors has oversight of CR issues. Our Vice President of Corporate Responsibility is charged with embedding CR priorities into the company's strategy and operations and provides regular briefings on Symantec's CR performance to the Board Committee and executive management.

**UN Global Compact related stakeholder engagement:** We promote and converse about the UN Global Compact and its 10 principles and the Women's Empowerment Principles at internal and external events and online and participate in UN Global Compact work streams.

**Engaging with our key stakeholders:** We engage with those stakeholders who have great potential impact on our operations or who could be significantly affected by our business activities. We set up channels of communication to solicit feedback on our CR performance and on external CR reporting. Our purpose of engagement is to continually refine our approach and practices.

**Reporting human rights, labor rights, environmental performance and corruption concerns:** Our EthicsLine allows employees and external stakeholders to report concerns regarding these topics in a safe, secure and confidential manner.

### Key activities and progress FY15

External engagement activities included:

- Conducted an online survey of readers of our 2014 CR report to gain feedback
- Partnered to produce diversity dialogues among students in collaboration with Net Impact
- Involved in the WEP activities and in UN Global Compact LEAD work streams

Internal Stakeholder Engagement

- Employee engagement around company separation
- Requested feedback from employees as to what is important to them moving forward
- Upgraded Green Team intranet pages to improve engagement with employees

### Links to more information

[FY15 CR Report, CEO Message, p. 3, and pp. 6-7](#)  
[FY14 CR Report, pp. 3, 4, 8, 9, 14, 15, 18](#)  
[Support for the United Nations Global Compact](#)  
[Managing Corporate Responsibility](#)  
[Symantec Stakeholder Engagement](#)  
[Corporate Responsibility Snapshot](#)  
[Symantec's EthicsLine](#)

## Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and [Principle 2](#): make sure that they are not complicit in human rights abuses.

**Criteria 3: Describe robust commitments, strategies or policies in the area of human rights**

**Criteria 4: Describe effective management systems to integrate the human rights principles**

**Criteria 5: Describe effective monitoring and evaluation mechanisms of human rights integration**

### Our commitments and approach

**Our business is data privacy:** We view data privacy as a human rights issue, because safeguarding information and its owners is one way of protecting freedom of expression.

**Our commitments:** Our human rights policy statement builds on our commitment to uphold the ten principles of the UN Global Compact and is aligned with the [Universal Declaration of Human Rights](#). We are committed to respecting human rights, and expect our employees and suppliers to adhere to our relevant Codes of Conduct, Human Rights Policy and Conflict Minerals Policy. Our company has zero-tolerance policy regarding human trafficking and expects all employees and suppliers to respect human rights. All Symantec business units are charged with responsibility for overseeing adherence to our human rights and conflict minerals policies.

**Employee Code of Conduct Training:** We ensure proper understanding of our position on human rights by requiring that every Symantec employee take part in our Code of Conduct training, which includes training on our Human Rights Policy.

**Supplier requirements and due diligence process:** All Tier 1 suppliers are required to sign our new Supplier Social and Environmental Service Agreement, which commits them to agree to implement our EICC-aligned Code of Conduct.

### Key activities and progress FY15

#### Ongoing development of policies and commitments

- Developed a new human trafficking policy and compliance plan, which outlines adherence to new U.S. federal requirements. The policy and plan are set for implementation in FY16
- Continued to focus on products and services that assist in protecting the privacy of data

#### Engagement of employees and suppliers

- All employees take part in Code of Conduct training
- Rolled out our new supplier program to Tier 1 suppliers, which includes the EICC code of conduct, the EICC SAQ online assessment tool and the EICC VAP
- 4 of 20 Tier 1 suppliers agreed to adopt the new EICC-aligned Code of Conduct as part of working toward our goal to achieve 100 percent agreement and implementation by end of 2016
- Received a 100 percent response rate from Tier 1 suppliers on our conflict minerals survey and conducted due diligence on all surveys
- Filed our Conflict Minerals Report for January 1-December 31, 2014 in May of 2015
- Continued investigation of the chain of custody and source of the minerals we use in our products

### Links to more information

[FY15 CR Report, p.17](#)  
[FY14 CR Report, p. 17, 46](#)  
[Managing Corporate Responsibility](#)  
[Corporate Responsibility FAQ](#)  
[Corporate Responsibility Snapshot](#)  
[Conflict Minerals Policy](#)  
[Symantec's EthicsLine](#)

## Labor

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labor;

[Principle 5](#): the effective abolition of child labor; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.

**Criteria 6: Describe robust commitments, strategies or policies in the area of labour principles**

**Criteria 7: Describe effective management systems to integrate the labour principles**

**Criteria 8: Describe effective monitoring and evaluation mechanisms of labor principles integration**

### Our commitments and approach

**Labor rights at Symantec:** The labor rights section of our Human Rights Policy lays out the company's expectations for fair employment, non-discrimination and abolition of workplace harassment, and supports the International Labour Organization's core conventions. It sets forth our assessment of significant company risks and opportunities related to human rights, including: privacy, freedom of expression, labor rights and gender equality. We additionally promote gender equality as a founding signatory of the WEP.

**Employee value, leadership, and diversity and inclusion:** Our Employment Value Proposition (EVP) is our formalized promise to employees of what they can expect and the Leadership Success Profile (LSP) is a vision of key behaviors that will lead to success. As we roll out activities and trainings related to our EVP and LSP, we will monitor and evaluate their effectiveness. We are also committed to integrating our new vision of Diversity and Inclusion throughout our company.

**Communications, outreach and training:** We raise awareness about our labor principles and policies through outreach and training, including via mandatory employee Code of Conduct training.

### Key activities and progress FY15

As part of our commitment to labor rights and to creating value for our employees, we developed an employee-engagement strategy to strengthen and roll-out our EVP and LSP in FY16. These principles fosters a work culture that is respectful of labor rights and allows employees to develop to their highest potential.

In FY15, our newly formed Diversity and Inclusion team developed:

- Developed a centralized framework and goals to guide the company's efforts
- Defined a vision of diversity beyond gender
- Developed processes to leverage compliance, methods of talent acquisition and communications to promote diversity and inclusion
- Established a continual-improvement plan including setting organizational targets and monitoring and measuring progress
- Created an online analytic tool to track workforce representation and talent

Symantec also:

- Served on the WEP Advisory Committee and gave a presentation on "Unconscious Bias" at one of its events
- Achieved 100 percent ranking on the Human Rights Campaign Foundation's Best Places to Work for LGBT Equality

Maintained existing and developed new partnerships to increase diversity and inclusion: Dare to be Digital, Lesbians, in Tech, Latinas and Net Impact.

### Links to more information

[FY15 CR Report, pp. 9-10](#)

[2014 Symantec CR Report, pp. 4, 9 18, 21, 26, 45, 46, 47](#)

[Symantec Code of Conduct](#)

[Symantec Human Rights Policy](#)

[Diversity and Inclusion](#)

[Symantec's EthicsLine](#)

## Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

**Criteria 9: Describe robust commitments, strategies or policies in the area of environmental stewardship**

**Criteria 10: Describe effective management systems to integrate the environmental principles**

**Criteria 11: Describe effective monitoring and evaluation mechanisms for environmental stewardship**

### Our commitments and approach

**Our commitment to the environment:** Environmental stewardship is a key area of focus for Symantec. Our companywide environmental program ensures that we identify and address our environmental impacts responsibly. We are a signatory of and active participant in the following multi-stakeholder groups, which help us create broader positive impact:

- The Future of Internet Power Initiative
- Business for Innovative Climate and Energy Policy (BICEP) Climate Declaration
- Connect the Drops

**Environmental Management Systems and Frameworks:** We have a strong environmental framework based on the ISO 14001 Environmental Management System standard and a related environmental policy. We use a continual improvement framework based on the “Plan, Do, Check, Act” approach in our Environmental Management System.

**Monitoring and measuring emissions:** We have been tracking GHG emissions from our direct operations and have purchased electricity and business travel since FY08. Our GHG emission figures are calculated and updated in accordance with the WRI and the WBCSD GHG Protocol. Once the split of our company is complete, Symantec will set a new GHG emissions reduction goal and develop a strategic plan to achieve the goal.

### Key activities and progress FY15

#### GHG emissions reduction and energy-efficiency initiatives

- Progressed on internal consolidation of Symantec labs and data centers
- Measured 36 percent reduction of our company’s total GHG emissions from business travel
- Certified one of Symantec’s eight hardware products with Energy Star. Energy Star certification for the remaining hardware products is expected by end of calendar year 2015
- Continuing setting up process to ensure all new products scheduled to launch will meet Energy Star requirements
- Symantec’s Green Teams encouraged employees to sign up for our “One Mug, One Planet” pledge
- Three Green Talks were hosted at Symantec sites in Mountain View, California; Oaxaca, Mexico; and Reading, UK to engage employees
- Provided a list of our vendors to EICC and CDP for participation in the CDP Supply Chain Initiative

#### Water

- Joined Connect the Drops—a new California multi-stakeholder water initiative
- Conducted water risk assessments
- Surveyed suppliers regarding their water policies

### Links to more information

[FY15 CR Report, pp. 16-17](#)

[FY14 CR Report, pp. 4, 38, 39 40, 42, 65](#)

[Environmental Performance](#)

[Environmental Policy Statement](#)

[Symantec One Mug, One Planet Blog](#)

## Anti-Corruption

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

**Criteria 12: Describe robust commitments, strategies or policies in the area of anti-corruption**

**Criteria 13: Describe effective management systems to integrate the anti-corruption principle**

**Criteria 14: Describe effective monitoring and evaluation mechanisms for the integration of anti-corruption**

### Our commitments and approach

**Strategy to ensure anti-corruption:** We hold ourselves accountable for operating with integrity. We offer the Code of Conduct in nine languages and supplement it with our anti-corruption, non-discrimination, human rights and non-retaliation policies. The Code requires compliance with the provisions of the U.S. Foreign Corrupt Practices Act (FCPA), global conventions that Symantec may be a party to, and all applicable anti-bribery and anti-corruption laws.

**Symantec's Corporate Risk Assurance (CRA) Function:** Our CRA conducts audits to monitor company policies and operations for corruption risk. Audit findings are reported to the Office of Ethics and Compliance, which is responsible for remedial action. Third-party channel partners are expected to act in accordance with our Code of Conduct and any applicable anti-corruption laws.

**Reporting corruption:** Our EthicsLine allows employees and external stakeholders to report corruption confidentially.

### Key activities and progress FY15

For the eighth consecutive year, we were selected as one of the World's Most Ethical Companies, the FTSE4 Good Global Index, and the Dow Jones Sustainability Index.

We communicate our anti-corruption policy and procedures to employees through:

- A quarterly management newsletter
- Information communicated during Symantec's annual Ethics Week
- Intranet videos and additional training videos
- Formalized online global anti-corruption training for all employees

During FY15, we received 333 concerns through all reporting channels which led to follow-up investigations. The concerns were related to corruption, human resources issues and other matters covered by our Code of Conduct.

Eleven internal Symantec audits were performed by Symantec's Corporate Risk Assurance function, covering U.S. Foreign Corrupt Practices Act provisions.

Our internal and supplier Codes of Conduct are aligned with EICC's code, which has strengthened our stance against corruption. We are engaging Tier 1 suppliers in the process of either translating or reviewing the new Supplier Social and Environment Service Agreement, which requires implementation of the Code. Four of our 20 Tier 1 suppliers adopted the Code in FY15.

There were no incidents of corruption reported or found during FY15 and no contracts with business partners were terminated or not renewed due to incidents of corruption.

### Links to more information

[FY15 CR Report, p. 7](#)  
[FY14 CR Report, p. 17, 46](#)  
[Managing Corporate Responsibility](#)  
[Corporate Responsibility FAQ](#)  
[Corporate Responsibility Snapshot](#)  
[Conflict Minerals Policy](#)  
[Symantec's EthicsLine](#)

## UN Support

Supporting the UN fosters global commitment and progress toward the UN Global Compact ten principles

**Criteria 15: The COP describes core business contributions to UN Goals and issues**

**Criteria 16: The COP describes strategic social investments and philanthropy**

**Criteria 17: The COP describes advocacy and public policy engagement**

### Our commitments and approach

**Support of the UN Global Compact:** We continue our support for the ten principles of the United Nations Global Compact and the Women Empowerment Principles (WEP), and have been a member of the UN Global Compact U.S. Network since its inception.

**Community investment, giving, and volunteerism:** We believe that giving back to communities is an important aspect of doing business for Symantec. We encourage our employees to volunteer time and resources to charitable causes. We believe that volunteerism helps to forge stronger connections between employees, the company and the communities where we operate.

**Advocacy and Public Policy Engagement:** We have and will continue to serve on committees and workgroups of the UN Global Compact U.S. Network (UN Global Compact principles and WEP principles), actively take part in the Electronic Industry Citizenship Coalition (EICC) (human rights, labor rights, environment, anti-corruption); and partner with a variety of organizations dedicated to increasing IT and cybersecurity opportunities for underserved populations (diversity and inclusion). We also promote and advocate online safety and privacy protection through a variety of communications and partnership initiatives.

### Key activities and progress FY15

We participated in two UN Global Compact work streams:

- Post-2015 Development
- Plan Roadmap for Integrated Sustainability

Our UN Global Compact WEP involvement included giving a talk at WEP's annual meeting on "Unconscious Bias".

We provided the following community investment support in FY15:

- Cash contributions totaled \$5,487,000
- Employees volunteered 29,983 hours
- Symantec matched \$1,060,000 in grant contributions of employees to non-profits
- Symantec's Software Donation program gave 471,575 software licenses totaling \$25,399,000 at retail value to 25,625 organizations in 38 countries

### Links to more information

[FY15 CR Report, pp. 7, 17-18](#)  
[FY14 CR Report pp. 5, 24, 30, 51, 59](#)  
[Community Investment](#)  
[AAUW Partnership](#)  
[Tech Women Partnership](#)  
[WAGGG Support](#)  
[Symantec Service Corps](#)

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In FY15, we made the following community investments, among others:

- Launched the Symantec Cyber Career Connection (SC3) campaign to help reach our goals focused on increasing interest and opportunities in STEM education through global nonprofit partnerships and ran two pilot programs in three U.S. cities
- Supported added cybersecurity curriculum to American Association of University Women's (AAUW) Tech Trek week-long science and math for their pilot year and TeenForce's technology and workforce readiness training for foster youth in ninth and tenth grades
- Partnered with Net Impact to develop Diversity of Chapters at select universities and sponsored two sessions focused on diversity at NI's annual conference
- Awarded World Association of Girl Guides funding to develop cybersecurity curriculum for a merit badge
- Symantec Service Corps sent nine employees to Ankara, Turkey, where they spent four weeks volunteering their professional skills with three Turkish nonprofits
- Symantec's Foundation also supports associations such as: World Association of Girl Guides and Girl Scouts (WAGGGS) program [Surf Smart](#), the Global Fund for Women and Women's History Month 2015, partnership project: [IGNITE: Women Fueling Science & Technology](#) and our hosting of a career experience program for the Waltham [Boys & Girls Clubs of America](#) (BGCA)