



## ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2022 - GENERELL INFORMASJON

### Enheten

Organisasjonsnummer: 998 527 791  
Organisasjonsform: Aksjeselskap  
Foretaksnavn: NORTONLIFELOCK NORWAY AS  
Forretningsadresse: c/o Arntzen de Besche Advokatfirma  
Ruseløkkveien 30  
0251 OSLO

### Regnskapsår

Årsregnskapets periode: 01.05.2021 - 30.04.2022

### Konsern

Morselskap i konsern: Nei

### Regnskapsregler

Regler for små foretak benyttet: Ja  
Benyttet ved utarbeidelsen av årsregnskapet til selskapet: Forenklet IFRS

### Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Jessica Horrillo  
Dato for fastsettelse av årsregnskapet: 20.10.2022

### Grunnlag for avgivelse

År 2022: Årsregnskapet er elektronisk innlevert  
År 2021: Tall er hentet fra elektronisk innlevert årsregnskap fra 2022

*Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.*

Brønnøysundregistrene, 06.12.2023



### Resultatregnskap

Beløp i: NOK	Note	2022	2021
<b>RESULTATREGNSKAP</b>			
<b>Inntekter</b>			
Revenue	1	22 488 421	40 542 077
<b>Sum inntekter</b>	9	<b>22 488 421</b>	<b>40 542 077</b>
<b>Kostnader</b>			
Staff Cost	2,3,4	14 283 104	41 965 034
Depreciation	8	1 628 620	2 330 721
Other operating expenses	5,6	2 054 499	3 586 659
<b>Sum kostnader</b>		<b>17 966 223</b>	<b>47 882 414</b>
<b>Driftsresultat</b>		<b>4 522 198</b>	<b>-7 340 337</b>
<b>Finansinntekter og finanskostnader</b>			
Renteinntekt fra foretak i samme konsern		430 131	184 154
<b>Sum finansinntekter</b>		<b>430 131</b>	<b>184 154</b>
Other financial expense		34 391	116 557
<b>Sum finanskostnader</b>		<b>34 391</b>	<b>116 557</b>
<b>Netto finans</b>		<b>395 740</b>	<b>67 597</b>
<b>Ordinært resultat før skattekostnad</b>		<b>4 917 938</b>	<b>-7 272 740</b>
Income Tax Expense	7	767 312	1 058 472
<b>Ordinært resultat etter skattekostnad</b>		<b>4 150 626</b>	<b>-8 331 212</b>
Other		0	-5 447
<b>Årsresultat</b>		<b>4 150 626</b>	<b>-8 336 659</b>
<b>Overføringer og disponeringer</b>			
Transfers to other equity		4 150 626	-8 336 659
<b>Sum overføringer og disponeringer</b>		<b>4 150 626</b>	<b>-8 336 659</b>



## Balanse

Beløp i: NOK	Note	2022	2021
<b>BALANSE - EIENDELER</b>			
<b>Anleggsmidler</b>			
<b>Immaterielle eiendeler</b>			
<b>Varige driftsmidler</b>			
Property and equipment	8	370 062	1 998 682
<b>Sum varige driftsmidler</b>		<b>370 062</b>	<b>1 998 682</b>
<b>Sum anleggsmidler</b>		<b>370 062</b>	<b>1 998 682</b>
<b>Omløpsmidler</b>			
<b>Varer</b>			
<b>Fordringer</b>			
Other receivables	7	223 265	1 038 570
Konsernfordringer	9	14 354 700	97 233 595
<b>Sum fordringer</b>		<b>14 577 965</b>	<b>98 272 165</b>
<b>Bankinnskudd, kontanter og lignende</b>			
Cash and cash equivalents	10	792 100	5 567 100
<b>Sum bankinnskudd, kontanter og lignende</b>		<b>792 100</b>	<b>5 567 100</b>
<b>Sum omløpsmidler</b>		<b>15 370 065</b>	<b>103 839 265</b>
<b>SUM EIENDELER</b>		<b>15 740 127</b>	<b>105 837 947</b>
<b>BALANSE - EGENKAPITAL OG GJELD</b>			
<b>Egenkapital</b>			
<b>Innskutt egenkapital</b>			
Share capital	11,12	6 719 523	6 719 523
Overkurs	12	557 373	557 373
<b>Sum innskutt egenkapital</b>		<b>7 276 896</b>	<b>7 276 896</b>
<b>Opptjent egenkapital</b>			



### Balanse

<b>Beløp i: NOK</b>	<b>Note</b>	<b>2022</b>	<b>2021</b>
Other equity	12	2 847 212	82 114 833
<b>Sum opptjent egenkapital</b>		<b>2 847 212</b>	<b>82 114 833</b>
<b>Sum egenkapital</b>		<b>10 124 108</b>	<b>89 391 729</b>
<b>Gjeld</b>			
<b>Langsiktig gjeld</b>			
Utsatt skatt	13	710 149	830 816
Provisions for other liabilities	15	20 611	
<b>Sum avsetninger for forpliktelser</b>		<b>730 760</b>	<b>830 816</b>
<b>Annen langsiktig gjeld</b>			
<b>Sum langsiktig gjeld</b>		<b>730 760</b>	<b>830 816</b>
<b>Kortsiktig gjeld</b>			
Leverandørgjeld		4 230	32 983
Current Tax	7	2 253 235	0
Skyldige offentlige avgifter		507 429	2 524 968
Kortsiktig konserngjeld		811 801	2 603 389
Other short-term liabilities	10,14, 15	1 308 564	10 454 062
<b>Sum kortsiktig gjeld</b>		<b>4 885 259</b>	<b>15 615 402</b>
<b>Sum gjeld</b>		<b>5 616 019</b>	<b>16 446 218</b>
<b>SUM EGENKAPITAL OG GJELD</b>		<b>15 740 127</b>	<b>105 837 947</b>



Brønnøysundregistrene

ÅRSREGNSKAP FOR REGNSKAPSÅRET 2022 - GENERELL INFORMASJON

Journalnummer: 2022 941448

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Brønnøysundregistrene, 08.11.2022



Organisasjonsnr: 998 527 791  
NORTONLIFELOCK NORWAY AS

## RESULTATREGNSKAP

<b>Beløp i: NOK</b>	<b>Note</b>	<b>2022</b>	<b>2021</b>
<b>RESULTATREGNSKAP</b>			
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Organisasjonsnr: 998 527 791  
NORTONLIFELOCK NORWAY AS

## BALANSE

**Beløp i: NOK** **Note** **2022** **2021**

### BALANSE - EIENDELER

#### Anleggsmidler Immaterielle eiendeler

#### Varige driftsmidler

Property and equipment 8 370 062 1 998 682  
Sum varige driftsmidler 370 062 1 998 682

Sum anleggsmidler 370 062 1 998 682

#### Omløpsmidler

#### Varer

#### Fordringer

Other receivables 7 223 265 1 038 570  
Konsernfordringer 9 14 354 700 97 233 595  
Sum fordringer 14 577 965 98 272 165

#### Bankinnskudd, kontanter og lignende

Cash and cash equivalents 10 792 100 5 567 100  
Sum bankinnskudd,  
kontanter og lignende 792 100 5 567 100

Sum omløpsmidler 15 370 065 103 839 265

**SUM EIENDELER 15 740 127 105 837 947**

### BALANSE - EGENKAPITAL OG GJELD

#### Egenkapital

#### Innskutt egenkapital

Share capital 11,12 6 719 523 6 719 523  
Overkurs 12 557 373 557 373  
Sum innskutt egenkapital 7 276 896 7 276 896

#### Opptjent egenkapital

Other equity 12 2 847 212 82 114 833  
Sum opptjent egenkapital 2 847 212 82 114 833

Sum egenkapital 10 124 108 89 391 729

#### Gjeld

#### Langsiktig gjeld

Utsatt skatt 13 710 149 830 816  
Provisions for other  
liabilities 15 20 611



<b>Sum avsetninger for forpliktelser</b>		<b>730 760</b>	<b>830 816</b>
<b>Annen langsiktig gjeld</b>			
<b>Sum langsiktig gjeld</b>		<b>730 760</b>	<b>830 816</b>
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Organisasjonsnr: 998 527 791  
NORTONLIFELOCK NORWAY AS

NOTEOPPLYSNINGER - SELSKAP - alle poster oppgitt i hele tall

## Note

### Regnskapsprinsipper

Basis of preparation The financial statements have been prepared in compliance with Simplified IFRS (International Financial Reporting Standards) according to the Norwegian Accounting Act § 3-9 with belonging regulations. The regulations implemented follow the IFRS valuation rules, with some exceptions. Foreign currency translation Transactions in foreign currencies are translated into Norwegian Kroner (NOK) at the foreign exchange rate ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies at the balance sheet date are retranslated into Norwegian Kroner at the foreign exchange rate ruling at that date. Foreign exchange differences arising on translation are recognized in the income statement. Balance sheet classification Assets are classified as current when intended for consumption in the normal operating cycle. Current liabilities consist of payables due within one year. Other balance sheet items are classified as fixed assets and non-current liabilities. Current assets, current and non-current liabilities are recognized at nominal value. Fixed assets are valued at cost, less depreciation and impairment losses. Tangible fixed assets Tangible fixed assets are depreciated over the expected economic life of the asset, normally based on a straight-line depreciation plan. If there is a change in the depreciation plan the effect will be divided up on the remaining depreciation plan (?breakpoint method?). Maintenance is recognized as an expense in the income statement. Tangible fixed assets include a right-of-use asset related to a leased property. Asset impairment Impairment tests are carried out on assets if there is an indication that the carrying amount of an asset exceeds the estimated recoverable amount. The test is performed on the lowest level of cash-generating unit at which independent cash flows can be identified. If the carrying amount is higher than both the fair value less cost to sell and its value in use (net present value of future use/ownership), the asset is written down to the higher of the fair value less cost to sell and its value in use. Previous impairment charges, except write-down of goodwill, are reversed in later periods if the conditions causing the write-down are no longer present. Financial assets Financial assets consist of receivables and cash and bank balances. Financial assets are classified as current assets unless they are held for permanent ownership or use. Debtors Trade debtors are recognized on the balance sheet net of provision for bad debts. The bad debts provision is made on an assessment of each individual debtor. Significant financial problems, the likelihood that the customer will become bankrupt or experience financial restructuring and postponements and insufficient payments are considered indicators that trade debtors should be written down. Taxation Taxation expense for the period comprises current and deferred tax recognized in the reporting period. Current tax is the amount of income tax payable in respect of the taxable profit for the current or prior years. Tax is calculated on the basis of tax rates and laws that have been enacted or substantively enacted by the period end. Deferred tax arises from timing differences between taxable profits and the income statement as stated in the financial statements. These timing differences arise from the inclusion of income and expenses in tax assessments in periods different from those in which they are recognized in the financial statements. Deferred tax assets and deferred tax liabilities have been presented net in the balance sheet. Leases At inception of a contract the Company assesses whether a contract is, or contains, a lease. A contract is, or contains a leases if the contract conveys the right to control the use of an



identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the company uses the definition of a lease in IFRS 16. The Company recognises a right-of-use asset and a lease liability at the commencement of the lease. The right-of-use asset is initially measured at cost, which comprises the present value of the future minimum lease payments, plus any initial direct costs incurred less any lease incentives received. The interest rate used to determine the present value of future payments is our incremental borrowing rate because the rate implicit in the Company's lease is not readily determinable. The right-of-use asset is subsequently depreciated using the straight-line method over the shorter of the lease term or the useful life of the underlying asset. The right of use asset is subject to testing for impairment. The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the Company's incremental borrowing rate. Short-term leases and leases of low-value assets The Company has elected not to recognise right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Company recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term. Employee benefits Pension The Company has a defined contribution plan which provides post-employment benefits to employees. The Company pays fixed contributions into a separate entity and has no legal or constructive obligation to pay further amounts. Obligations for contributions to the defined contribution pension plans are recognized as an expense in the profit and loss account in the periods during which services are rendered by employees. Share based payment transactions The Company has certain share-based payment plans which allow its employees to acquire shares in its ultimate parent undertaking NortonLifeLock Inc. The grant date fair value of share-based payment awards granted to employees is recognized as an employee expense with a corresponding increase in equity, over the period in which the employees become unconditionally entitled to the awards. The fair value of restricted stock units (RSU) and performance-based stock unit that does not contain a market condition is measured based on the market value of NortonLifeLock Inc.'s common stock on the date of grant. The expense is recognized over the service period which is the period that the employee must remain employed to receive the benefit of the award. The fair value of each performance-based restricted stock unit that contains a market condition is measured using a simulation model, taking into account the share price of NortonLifeLock Inc. as well as assumptions regarding a number of variables. The amount recognised as an expense is adjusted to reflect the actual number of awards for which the related service and non-market vesting conditions are expected to be met, such that the amount ultimately recognised as an expense is based on the number of awards that do meet the related service and non-market performance conditions at the vesting date. The ESPP has a lookback feature and the fair value of each share purchased under the ESPP is determined using a combination of the purchase discount and an option-pricing model. Revenues Sale of services: Revenues from services, which are presented net of value added tax, represent the support services provided to other group companies during the year on a cost-plus basis. Revenue is recognised during the period that the services are provided. Financial risk management Financial risk factors The Company is exposed to several financial risk factors. Market risk: The Company does not have any quoted investments and hence is not exposed to market risk. Foreign currency risk: Revenues earned are set in Norwegian Kroner. Price risk: The Company's customers are related companies. Price risk is considered low. Credit risk: The Company's exposure to credit risk is represented by the carrying amount of receivables and bank balances. All trade receivables were due from related companies and all of its cash is placed with regulated financial institutions. Liquidity risk: Liquidity risk management always aims to maintain sufficient liquid assets and credit facilities in order to ensure the availability of sufficient financial resources for the Company's operating activities. The Company is financed through related companies and the liquidity risk is considered as low. Interest rate risk: The company does not have external funding. Interest is earned/incurred on intercompany balances outside of business credit terms.

## Note



Antall årsverk i regnskapsåret  
18720.00

Note  
2

## Spesifisering av resultatregnskapet

### Lønnskostnader

<u>Lønn</u>	<u>Årets</u>	<u>Fjorårets</u>
	11185281.00	22954171.00
<u>Folketrygdavgift</u>	<u>Årets</u>	<u>Fjorårets</u>
	3047711.00	4514971.00
<u>Pensjonskostnader</u>	<u>Årets</u>	<u>Fjorårets</u>
	706832.00	801369.00
<u>Andre ytelser</u>	<u>Årets</u>	<u>Fjorårets</u>
	-656720.00	13694523.00
<u>Sum lønnskostnader</u>	<u>Årets</u>	<u>Fjorårets</u>
	14283104.00	41965034.00

Note

### Ekstraordinære inntekter og kostnader

<u>Sum</u>	<u>Beløp</u>
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Note  
8

### Varige driftsmidler og immaterielle eiendeler

<u>Anskaffelseskost 01.01.</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>
	10918434.00	
<u>Tilgang i året</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>
	0.00	
<u>Avgang i året</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>
	-280587.00	
<u>Anskaffelseskost 31.12.</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>
	10637847.00	
<u>Samlede av-/nedskrivn.</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>
	10267785.00	
<u>Balanseført verdi 31.12.</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>
	370062.00	
<u>Årets av-/nedskrivn.</u>	<u>Varige driftsmidler</u>	<u>Immaterielle eiend.</u>



1628620.00

Anskaffelseskost - balanseførte lånekostnader, egentilvirkede anleggsmidler

Goodwill spesifisert for hvert enkelt virksomhetskjøp

Avskrivningsplan for goodwill som er lenger enn fem år - begrunnelse

Mer om varige driftsmidler/immaterielle eiendeler

Konsernregnskap

Morselskapet sitt navn

Forretningskontor for morselskapet

Begrunnelse for at datterselskap er utelatt fra konsolideringen

Konsern, tilknyttet selskap m.v. - fordringer og gjeld

Fordringer

<u>Samlet beløp - foretak i samme konsern</u>	<u>Årets</u>	<u>Fjorårets</u>
	14354700.00	97233595.00

<u>Samlet beløp - tilknyttet selskap</u>	<u>Årets</u>	<u>Fjorårets</u>
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<u>Samlet beløp - foretak i samme konsern</u>	<u>Årets</u>	<u>Fjorårets</u>
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Kortsiktig gjeld

<u>Samlet beløp - foretak i samme konsern</u>	<u>Årets</u>	<u>Fjorårets</u>
	811801.00	2603389.00

<u>Samlet beløp - felles kontrollert virksomhet</u>	<u>Årets</u>	<u>Fjorårets</u>
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<u>Pantstillelse</u>	<u>Beløp</u>
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<u>Beholdning av egne aksjer</u>	<u>Antall</u>	<u>Pålydende</u>	<u>Andel av aksjek.</u>
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Financial Statements 1 May 2021 to 30 April 2022

NortonLifeLock Norway AS

0257 Oslo



**NortonLifeLock Norway AS**

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Enterprise 935 174 627 MVA

To the General Meeting of NortonLifeLock Norway AS

## Independent Auditor's Report

### Opinion

We have audited the financial statements of NortonLifeLock Norway AS (the Company), which comprise the balance sheet as at 30 April 2022, the income statement, statement of comprehensive income and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion

- the financial statements comply with applicable statutory requirements, and
- the financial statements give a true and fair view of the financial position of the Company as at 30 April 2022, and its financial performance and its cash flows for the year then ended in accordance with simplified application of international accounting standards according to section 3-9 of the Norwegian Accounting Act.

### Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company as required by laws and regulations and the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Responsibilities of Management for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with simplified application of International Accounting Standards according to the Norwegian Accounting Act section 3-9, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

### Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

KPMG AS, a Norwegian limited liability company and member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

Statsautoriserede revisorer - medlemmer av Den norske Revisorforening

Offices in:

Oslo	Elverum	Mo i Rana	Stord
Alta	Finnsnes	Molde	Straume
Arendal	Hamar	Skien	Tromsø
Bergen	Haugesund	Sandefjord	Trondheim
Bodo	Knarvik	Sandnessjøen	Tynset
Drammen	Kristiansand	Stavanger	Ålesund

Fenneo Dokumentnøkkel: BAWIO-WUUA5G-JZX6P-04QES-SZZ4Z-ZADK8



- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error. We design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting, and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves a true and fair view.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Oslo, 21 October 2022  
KPMG AS

Gunnar Sotnakk  
*State Authorised Public Accountant*  
(This document is signed electronically)

Fenneo Dokumentnøkkel: BAWIO-WUA5G-JZX6P-04QES-SZZ4Z-ZADK8



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## Gunnar Sotnakk

Statsautorisert revisor

På vegne av: KPMG AS

Serienummer: 9578-5993-4-2025853

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## NortonLifeLock Norway AS

### Income statement and statement of other comprehensive income for 1 May 2021 to 30 April 2022

	Note	Year ended 30 April 2022 NOK	Year ended 30 April 2021 NOK
Revenue	1	22,488,421	40,542,077
<b>Total operating revenue</b>	9	<b>22,488,421</b>	<b>40,542,077</b>
Staff costs	2, 3, 4	(14,283,104)	(41,965,034)
Depreciation of fixed assets	8	(1,628,620)	(2,330,721)
Other operating expenses	5, 6	(2,054,499)	(3,586,659)
<b>Total operating expenses</b>		<b>(17,966,223)</b>	<b>(47,882,414)</b>
<b>Operating Profit/(Loss)</b>		<b>4,522,198</b>	<b>(7,340,337)</b>
Interest income from group companies		430,131	184,154
Other financial expense		(34,391)	(116,557)
<b>Net financial items</b>		<b>395,740</b>	<b>67,597</b>
Other non-operating expense		-	(5,447)
<b>Total non-operating expense</b>		<b>-</b>	<b>(5,447)</b>
<b>Profit/(Loss) before tax</b>		<b>4,917,938</b>	<b>(7,278,187)</b>
Income tax expense	7	(767,312)	(1,058,472)
<b>Profit/(Loss) for the year</b>		<b>4,150,626</b>	<b>(8,336,659)</b>
<b>Other comprehensive income / (loss)</b>			
Other comprehensive income for the year, net of tax		-	-
<b>Total comprehensive income / (loss) for the year</b>		<b>4,150,626</b>	<b>(8,336,659)</b>
<b>Transfers</b>			
Transfers to other equity		4,150,626	(8,336,659)
<b>Total transfers and allocations</b>		<b>4,150,626</b>	<b>(8,336,659)</b>



## NortonLifeLock Norway AS

### Balance sheet as at 30 April 2022

	Note	2022 NOK	2021 NOK
<b>ASSETS</b>			
<b>Tangible fixed assets</b>			
Property and equipment	8	<u>370,062</u>	<u>1,998,682</u>
<b>Total fixed assets</b>		<u><b>370,062</b></u>	<u><b>1,998,682</b></u>
<b>Current assets</b>			
<b>Receivables</b>			
Trade debtors	9	14,354,700	97,233,595
Current tax	7	-	286,336
Other receivables and prepayments		<u>223,265</u>	<u>752,234</u>
<b>Total receivables</b>	15	<u><b>14,577,965</b></u>	<u><b>98,272,165</b></u>
<b>Cash and cash equivalents</b>	10	<u><b>792,100</b></u>	<u><b>5,567,100</b></u>
<b>Total current assets</b>		<u><b>15,370,065</b></u>	<u><b>103,839,265</b></u>
<b>Total assets</b>		<u><b>15,740,127</b></u>	<u><b>105,837,947</b></u>



## NortonLifeLock Norway AS

### Balance sheet as at 30 April 2022

	Note	2022 NOK	2021 NOK
<b>EQUITY AND LIABILITIES</b>			
<b>Equity</b>			
<b>Paid in capital</b>			
Share capital (6,719,523 shares of kr 1)	11, 12	6,719,523	6,719,523
Share premium reserve	12	<u>557,373</u>	<u>557,373</u>
<b>Total paid-in capital</b>		<u><b>7,276,896</b></u>	<u><b>7,276,896</b></u>
<b>Retained earnings</b>			
Other equity	12	<u>2,847,212</u>	<u>82,114,833</u>
<b>Total retained earnings</b>		<u><b>2,847,212</b></u>	<u><b>82,114,833</b></u>
<b>Total equity</b>	12	<u><b>10,124,108</b></u>	<u><b>89,391,729</b></u>
<b>Non – current liabilities</b>			
Deferred tax	13	710,149	830,816
Provisions for other liabilities	15	<u>20,611</u>	<u>-</u>
<b>Total non-current liabilities</b>		<u><b>730,760</b></u>	<u><b>830,816</b></u>
<b>Current liabilities</b>			
Trade creditors		4,230	32,983
Lease liabilities	14	-	811,463
Public duties payable		507,429	2,524,968
Current tax	7	2,253,235	-
Related party payables	9	811,801	2,603,389
Bank overdraft	10	255,446	2,967
Other short-term liabilities		<u>1,053,118</u>	<u>9,639,632</u>
<b>Total current liabilities</b>	15	<u><b>4,885,259</b></u>	<u><b>15,615,402</b></u>
<b>Total liabilities</b>		<u><b>5,616,019</b></u>	<u><b>16,446,218</b></u>
<b>Total equity and liabilities</b>		<u><b>15,740,127</b></u>	<u><b>105,837,947</b></u>

Jessica Horrillo  
Chairperson

Thomas Masterson  
Board Member



## NortonLifeLock Norway AS

### Statement of cash flow 1 May 2021 to 30 April 2022

	Note	2022 NOK	2021 NOK
<b>Cash flow from operating activities</b>			
Profit / (Loss) before tax		4,917,938	(7,278,187)
Loss on disposal of fixed assets		-	77,846
Depreciation of fixed assets	8	1,628,620	2,330,721
Equity settled share-based payment expenses	16	(1,440,066)	12,089,423
Interest income from group companies		(430,131)	(184,154)
Lease interest	14	8,761	61,698
<b>Operating profit before working capital changes</b>		<b>4,685,122</b>	<b>7,097,347</b>
Change in other receivables and prepayments		528,969	653,753
Change in trade creditors and other liabilities		(10,612,195)	441,301
Change in amount due from/to related parties		81,517,438	1,055,419
<b>Net cash outflow from operations</b>		<b>71,434,212</b>	<b>2,150,473</b>
Taxes refund / (paid)		1,651,591	(5,301,719)
<b>Net cash from operating activities</b>		<b>77,770,925</b>	<b>3,946,101</b>
<b>Cash flow from investing activities</b>			
Purchase of fixed assets	8	-	(153,038)
<b>Net cash outflow from investing activities</b>		<b>-</b>	<b>(153,038)</b>
<b>Cash flow from financing activities</b>			
Dividend paid during the year		(81,978,181)	-
Payment of lease liabilities	14	(820,224)	(1,640,447)
<b>Net cash outflow from financing activities</b>		<b>(82,798,405)</b>	<b>(1,640,447)</b>
Net change in cash and cash equivalents		(5,027,480)	2,152,616
Cash and cash equivalents at the beginning of the year		5,564,133	3,411,517
<b>Cash and cash equivalents at the end of the year</b>		<b>536,653</b>	<b>5,564,133</b>



## **NortonLifeLock Norway AS**

### **Notes to the financial statements for 1 May 2021 to 30 April 2022**

#### **General information**

The company is using a divergent accounting year. The annual accounts are prepared for the period from 1 May 2021 to 30 April 2022. On 3 December 2019, the Company changed its name from Symantec (Norway) AS to NortonLifeLock Norway AS.

#### **Accounting principles**

##### **Basis of preparation**

The financial statements have been prepared in compliance with Simplified IFRS (International Financial Reporting Standards) according to the Norwegian Accounting Act § 3-9 with belonging regulations. The regulations implemented follow the IFRS valuation rules, with some exceptions.

##### **Foreign currency translation**

Transactions in foreign currencies are translated into Norwegian Kroner (NOK) at the foreign exchange rate ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies at the balance sheet date are retranslated into Norwegian Kroner at the foreign exchange rate ruling at that date. Foreign exchange differences arising on translation are recognized in the income statement.

##### **Balance sheet classification**

Assets are classified as current when intended for consumption in the normal operating cycle. Current liabilities consist of payables due within one year. Other balance sheet items are classified as fixed assets and non-current liabilities. Current assets, current and non-current liabilities are recognized at nominal value. Fixed assets are valued at cost, less depreciation and impairment losses.

##### **Tangible fixed assets**

Tangible fixed assets are depreciated over the expected economic life of the asset, normally based on a straight-line depreciation plan. If there is a change in the depreciation plan the effect will be divided up on the remaining depreciation plan ("breakpoint method"). Maintenance is recognized as an expense in the income statement. Tangible fixed assets include a right-of-use asset related to a leased property.

##### **Asset impairment**

Impairment tests are carried out on assets if there is an indication that the carrying amount of an asset exceeds the estimated recoverable amount. The test is performed on the lowest level of cash-generating unit at which independent cash flows can be identified. If the carrying amount is higher than both the fair value less cost to sell and its value in use (net present value of future use/ownership), the asset is written down to the higher of the fair value less cost to sell and its value in use. Previous impairment charges, except write-down of goodwill, are reversed in later periods if the conditions causing the write-down are no longer present.



## **NortonLifeLock Norway AS**

### **Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)**

#### **Financial assets**

Financial assets consist of receivables and cash and bank balances. Financial assets are classified as current assets unless they are held for permanent ownership or use.

#### **Debtors**

Trade debtors are recognized on the balance sheet net of provision for bad debts. The bad debts provision is made on an assessment of each individual debtor. Significant financial problems, the likelihood that the customer will become bankrupt or experience financial restructuring and postponements and insufficient payments are considered indicators that trade debtors should be written down.

#### **Taxation**

Taxation expense for the period comprises current and deferred tax recognized in the reporting period. Current tax is the amount of income tax payable in respect of the taxable profit for the current or prior years. Tax is calculated on the basis of tax rates and laws that have been enacted or substantively enacted by the period end. Deferred tax arises from timing differences between taxable profits and the income statement as stated in the financial statements. These timing differences arise from the inclusion of income and expenses in tax assessments in periods different from those in which they are recognized in the financial statements. Deferred tax assets and deferred tax liabilities have been presented net in the balance sheet.

#### **Leases**

At inception of a contract the Company assesses whether a contract is, or contains, a lease. A contract is, or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the company uses the definition of a lease in IFRS 16.

The Company recognises a right-of-use asset and a lease liability at the commencement of the lease. The right-of-use asset is initially measured at cost, which comprises the present value of the future minimum lease payments, plus any initial direct costs incurred less any lease incentives received. The interest rate used to determine the present value of future payments is our incremental borrowing rate because the rate implicit in the Company's lease is not readily determinable.

The right-of-use asset is subsequently depreciated using the straight-line method over the shorter of the lease term or the useful life of the underlying asset. The right of use asset is subject to testing for impairment.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the Company's incremental borrowing rate.



## **NortonLifeLock Norway AS**

### **Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)**

#### **Leases (continued)**

##### *Short-term leases and leases of low-value assets*

The Company has elected not to recognise right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Company recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

#### **Employee benefits**

##### *Pension*

The Company has a defined contribution plan which provides post-employment benefits to employees. The Company pays fixed contributions into a separate entity and has no legal or constructive obligation to pay further amounts. Obligations for contributions to the defined contribution pension plans are recognized as an expense in the profit and loss account in the periods during which services are rendered by employees.

##### *Share based payment transactions*

The Company has certain share-based payment plans which allow its employees to acquire shares in its ultimate parent undertaking NortonLifeLock Inc. The grant date fair value of share-based payment awards granted to employees is recognized as an employee expense with a corresponding increase in equity, over the period in which the employees become unconditionally entitled to the awards.

The fair value of restricted stock units (RSU) and performance-based stock unit that does not contain a market condition is measured based on the market value of NortonLifeLock Inc's common stock on the date of grant. The expense is recognized over the service period which is the period that the employee must remain employed to receive the benefit of the award.

The fair value of each performance-based restricted stock unit that contains a market condition is measured using a simulation model, taking into account the share price of NortonLifeLock Inc. as well as assumptions regarding a number of variables. The amount recognised as an expense is adjusted to reflect the actual number of awards for which the related service and non-market vesting conditions are expected to be met, such that the amount ultimately recognised as an expense is based on the number of awards that do meet the related service and non-market performance conditions at the vesting date. The ESPP has a lookback feature and the fair value of each share purchased under the ESPP is determined using a combination of the purchase discount and an option-pricing model.

#### **Revenues**

##### *Sale of services:*

Revenues from services, which are presented net of value added tax, represent the support services provided to other group companies during the year on a cost-plus basis. Revenue is recognised during the period that the services are provided.



**NortonLifeLock Norway AS**

**Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)**

**Financial risk management**

**Financial risk factors**

The Company is exposed to several financial risk factors.

*Market risk:*

The Company does not have any quoted investments and hence is not exposed to market risk.

*Foreign currency risk:*

Revenues earned are set in Norwegian Kroner.

*Price risk:*

The Company's customers are related companies. Price risk is considered low.

*Credit risk:*

The Company's exposure to credit risk is represented by the carrying amount of receivables and bank balances. All trade receivables were due from related companies and all of its cash is placed with regulated financial institutions.

*Liquidity risk:*

Liquidity risk management always aims to maintain sufficient liquid assets and credit facilities in order to ensure the availability of sufficient financial resources for the Company's operating activities. The Company is financed through related companies and the liquidity risk is considered as low.

*Interest rate risk:*

The company does not have external funding. Interest is earned/incurred on intercompany balances outside of business credit terms.

**Note 1 – Revenues**

The company has agency agreements relating to sales and marketing and research and development services provided to other group companies. The Company earned revenues under these agreements during the year ended 30 April 2022 of NOK 22,488,421 (2021: NOK 40,542,077).



## NortonLifeLock Norway AS

### Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)

#### Note 2 – Payroll expenses

	2022 NOK	2021 NOK
<b>Breakdown of payroll expenses</b>		
Salaries and wages	11,185,281	22,954,171
Social security costs	3,047,711	4,514,971
Pension expenses	706,832	801,369
Share based payment	(1,440,066)	12,089,424
Restructuring costs	(43,206)	1,023,377
Other remuneration	826,552	581,722
<b>Total</b>	<b>14,283,104</b>	<b>41,965,034</b>

The average number of employees during the year ended 30 April 2022 was 9.

#### Note 3 - Remuneration to executives

	General manager NOK	Board NOK
Salaries/board fee	-	875,603
Bonus	-	1,691,838
Pension expenses	-	20,437
Other remuneration	-	1,875,708

#### Note 4 – Mandatory Occupational Pension

The company is obliged to keep an occupational pension scheme in accordance with the Norwegian Mandatory Occupational Pensions Act and has taken out such a pension scheme for all employees. The defined-contribution scheme is expensed on an ongoing basis and this year the total costs was NOK 706,832.

#### Note 5 - Auditor

The audit fee consists of the following elements:

	2022 NOK
Statutory audit	92,000
Other certification services	7,500
Tax consultancy services	17,500
<b>Expensed audit fee (excl. VAT)</b>	<b>117,000</b>



## NortonLifeLock Norway AS

### Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)

#### Note 6 - Other operating expenses

Other operating expenses consists of the following elements:

	<b>2022</b>	<b>2021</b>
	<b>NOK</b>	<b>NOK</b>
Occupancy costs	1,672,292	802,263
Travel expenses	(59,678)	(1,143)
Consultants fees and other external fees	420,349	1,004,804
Office expenses, subscriptions and repairs	131,787	669,482
Meetings, training and courses	29,598	66,756
Other costs	(139,849)	1,044,497
<b>Total other operating expenses</b>	<b>2,054,499</b>	<b>3,586,659</b>

#### Note 7 – Tax

Tax for the year consists of:

	<b>2022</b>
Ordinary Profit before tax	4,917,938
+/- Permanent differences	(1,430,160)
+/- Change in temporary differences	548,489
<b>Basis for the tax expense for the year</b>	<b>4,036,267</b>
Tax	887,979
+/- Change in temporary differences	(120,667)
<b>Tax expense</b>	<b>767,312</b>
<b>Payable taxes in the balance sheet</b>	<b>2,253,235</b>



## NortonLifeLock Norway AS

### Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)

#### Note 8 – Tangible fixed assets

##### Tangible fixed assets

	<b>Property &amp; equipment</b>
	<b>NOK</b>
Purchase cost at 1 May 2021	10,918,434
Additions	-
Disposals	-
Retirement	(280,587)
Purchase cost at 30 April 2022	10,637,847
Accumulated depreciation at 1 May 2021	8,919,752
Depreciation in the year	1,628,620
Disposals	-
Retirement	(280,587)
Accumulated depreciation at 30 April 2022	10,267,785
Net book value at 30 April 2022	370,062
Expected useful life	3 - 5 years
Depreciation plan, straight line	20 – 33.33 %

#### Note 9 – Balance and transactions with group companies

	<b>2022</b>	<b>2021</b>
	<b>NOK</b>	<b>NOK</b>
Related party receivables	14,354,700	97,233,595
Related party payables	(811,801)	(2,603,389)
Related party income	22,488,421	40,542,077

Related party receivables are unsecured, repayable on demand and bear interest at one month Libor rate.  
Related party payables are unsecured, repayable on demand.



**NortonLifeLock Norway AS**

**Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)**

**Note 10 – Cash and cash equivalents**

Cash and cash equivalents include an amount of NOK 109,992 related to monies held in restricted bank accounts.

	<b>2022</b>	<b>2021</b>
	<b>NOK</b>	<b>NOK</b>
Cash at bank	792,100	5,567,100
Bank overdraft	(255,447)	(2,967)
	<u>536,653</u>	<u>5,564,133</u>

**Note 11 – Share capital and shareholder information**

The share capital of the Company consists of 6 719 523 shares, with a nominal value per share is NOK 1. The total paid up share capital amounts to NOK 6,719,523.

At 30 April 2022, all shares in the Company were held by the parent company, NortonLifeLock Switzerland Sàrl, with a registered address: Holbeinstrasse 30, 8008 Zurich, Switzerland.

**Note 12 – Equity**

	<b>Share capital</b>	<b>Share premium</b>	<b>Other equity</b>	<b>Total</b>
	<b>NOK</b>	<b>reserve</b>	<b>NOK</b>	<b>NOK</b>
	<b>NOK</b>	<b>NOK</b>	<b>NOK</b>	<b>NOK</b>
Equity as of 1 May 2021	6,719,523	557,373	82,114,833	89,391,729
Share based compensation for the year	-	-	(1,440,066)	(1,440,066)
Dividend declared during the year	-	-	(81,978,181)	(81,978,181)
Net profit for the year	-	-	4,150,626	4,150,626
Equity as of 30 April 2022	<u>6,719,523</u>	<u>557,373</u>	<u>2,847,212</u>	<u>10,124,108</u>

**Note 13 – Deferred tax**

	<b>2022</b>	<b>2021</b>	<b>Change</b>
	<b>NOK</b>	<b>NOK</b>	<b>NOK</b>
<b>Temporary differences</b>			
Fixed assets	(1,578,972)	(1,919,539)	340,567
Lease assets	-	1,067,470	(1,067,470)
Current liabilities	-	(716,639)	716,639
Profit and loss account	5,010,086	6,262,607	(1,252,521)
Lease accruals	-	(811,463)	811,463
Accruals	(203,500)	(106,000)	(97,500)
Basis for deferred tax	<u>3,227,614</u>	<u>3,776,436</u>	<u>(548,822)</u>
<b>Deferred tax on the balance sheet 30 April</b>	<u>710,149</u>	<u>830,816</u>	



## NortonLifeLock Norway AS

### Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)

#### Note 14 – Leases

The Company leases office space and office facilities.

#### *Amounts recognised in the balance sheet*

The balance sheet shows the following amounts relating to leases:

<b>Right-of-use assets</b>	<b>Land and buildings NOK</b>	<b>Total NOK</b>
Balance at 1 May 2021	1,067,470	1,067,470
Depreciation charge for the year	(1,067,470)	(1,067,470)
Balance at 30 April 2022	-	-

Right-of use assets related to leased properties that do not meet the definition of investment property are presented as property and equipment (see Note 8).

<b>Lease liabilities</b>	<b>2022 NOK</b>	<b>2021 NOK</b>
Current	-	811,463
Non-current	-	-
	-	811,463

#### *Amounts recognised in the income statement*

	<b>2022 NOK</b>	<b>2021 NOK</b>
Interest expense on lease liabilities	8,761	61,698
Depreciation charge of right-of-use assets	1,067,470	1,555,138
Expenses related to leases	1,672,292	802,263
Leases restoration fee	200,000	-
Total	2,948,523	2,419,099

#### *Amounts recognised in statement of cash flows*

	<b>2022 NOK</b>	<b>2021 NOK</b>
Total cash outflow for leases	820,224	1,640,447



## NortonLifeLock Norway AS

### Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)

#### Note 15 – Financial instruments

##### Assets

	Assets at Amortised cost NOK	Assets at fair value through P&L NOK	Derivatives NOK	Financial fixed assets for sale NOK
Trade receivables and other short-term receivables	14,577,965	-	-	-
Cash and bank deposits	792,100	-	-	-
Total	15,370,065	-	-	-

##### Liabilities

	Liabilities at Amortied cost NOK	Debt at fair value through P&L NOK	Derivatives NOK
Non-current liabilities	20,611	-	-
Trade creditors and other current liabilities	4,885,259	-	-
Total	4,905,870	-	-

All receivables mature within 1 year. There are no liabilities with a maturity in excess of 3 years.

#### Note 16 – Share-based payments

Share-based compensation benefits are awarded to certain employees of the Company under the Restricted Stock Units (RSUs), Performance-based Restricted Stock Units (PRUs) and Employee Share Purchase Plan (ESPP) of NortonLifeLock Inc. The RSUs, PRUs and ESPP were established to provide incentives to employees to remain in the service of NortonLifeLock Inc. and to better align the interests of the employees with the interests of NortonLifeLock Inc.'s shareholders, thereby maintaining and enhancing the long-term performance and profitability of NortonLifeLock Inc.

##### Restricted stock units (RSUs)

During the year, RSUs are granted to employees as part of the Company's regular annual equity compensation review program. RSUs are stock awards granted to employees that entitle them to receive freely tradeable common stock of the ultimate parent company upon vesting. RSUs generally vest over a three-year period. The grant date fair value of RSUs are within the range of USD 21.08 to USD 25.67.



## NortonLifeLock Norway AS

### Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)

#### Performance-based Restricted Stock Units (PRUs)

Performance-based restricted stock units are RSUs with performance-based restrictions granted to qualifying employees. The fair value of each PRU that does not contain a market condition is equal to the market value of NortonLifeLock Inc.'s common stock on the grant date. The fair value at grant date of each PRU that contains a market condition is measured using a simulation model, taking into account the share price of NortonLifeLock Inc. as well as assumptions regarding a number of variables, including expected share price volatility over the expected life of the awards, risk-free interest rates and expected dividends. The determination of the fair value of these awards also takes into consideration the likelihood of achievement of the market condition.

The compensation expense for the PRUs is initially based on the probability of achieving the target level of the company-specific performance condition and will be adjusted for subsequent changes in the estimated or actual outcome of this performance condition. PRUs generally vest over a three-year period. The grant date fair value of PRUs are within the range of USD 20.30 to USD 34.80.

The following table illustrates the number of RSUs and movements during the year:

	<b>2022</b>	<b>2021</b>
	<b>Number of RSUs</b>	<b>Number of RSUs</b>
Outstanding at beginning of the year	88,318	106,715
Granted during the year	30,103	25,789
Forfeited during the year	(81,318)	(1,377)
Released during the year	(25,733)	(42,809)
	<hr/>	<hr/>
Outstanding at end of the year	11,370	88,318

The following table illustrates the number of PRUs and movements during the year:

	<b>2022</b>	<b>2021</b>
	<b>Number of PRUs</b>	<b>Number of PRUs</b>
Outstanding at beginning of the year	4,292	-
Granted during the year	3,992	4,292
Forfeited during the year	(8,284)	-
	<hr/>	<hr/>
Outstanding at end of the year	-	4,292



**NortonLifeLock Norway AS**

**Notes to the financial statements for 1 May 2021 to 30 April 2022 (continued)**

**Employee Stock Purchase Plan ("ESPP")**

The ESPP provides an opportunity to employees of the Company to purchase ordinary shares of NortonLifeLock Inc at a discount through payroll contributions. The purchase price discount is 15% of the lower of either the fair market value at the beginning of the offering period or the fair market value on the purchase date over the offering period. The difference between the amount paid by the employee and the cost of the share purchase is borne by the Company.

**Note 17 – Subsequent events**

On 12 September 2022, NortonLifeLock Inc. (the ultimate parent of the Company) and Avast plc merged. At the date of approval of the financial statements, it is not possible to accurately assess any further potential impacts of this merger.



Skatteetaten

Vår dato 19.11.2018	Din dato 12.10.2018	Saksbehandler Henning Stokke
800 80 000 Skatteetaten.no	Din referanse Lars Helland	Telefon 800 80 000
Org.nr 996250318	Vår referanse 2018/1055977	Postadresse Postboks 9200 Grønland 0134 Oslo

ERNST & YOUNG AS  
Postboks 8015  
4068 STAVANGER

## Tillatelse til å utarbeide årsregnskap og årsberetning på engelsk språk for Symantec (Norge) AS, org.nr. 998 527 791

Vi viser til deres brev av 12. oktober 2018 hvor dere søker om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk for Symantec (Norge) AS, org.nr. 998 527 791.

Skattedirektoratet gir på bakgrunn av en konkret helhetsvurdering Symantec (Norge) AS, org.nr. 998 527 791, dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk, jf. regnskapsloven § 3-4 tredje ledd.

Dispensasjonen forutsetter at det benyttes engelsk språk ved utarbeidelsen av årsregnskapet og årsberetningen, og at øvrige opplysninger som vedtaket baserer seg på, heller ikke endres vesentlig.

Kopi av dette brevet må sendes Regnskapsregisteret i Brønnøysund sammen med årsregnskapet. Det påligger den regnskapspliktige å dokumentere ved dette brev at tillatelsen er gitt.

### Bakgrunn

Fra søknaden gjengis:

*Symantec (Norway) AS (org.nr. 998 527 791) er et norsk aksjeselskap og driver virksomhet knyttet til import, eksport, utvikling og salg av program- og maskinvare, og dertil hørende konsulenttjenester.*

*Selskapets arbeidsspråk er engelsk og selskapet er eid av et utenlandsk selskap. Styremedlemmer i selskapet kan ikke norsk noe som gjør at regnskapet bør utarbeides på engelsk. Både arbeidsspråket til selskapet og bransjespråket der selskapet opererer er engelsk, derfor fremstår kravet i regnskapsloven § 3-4 om utarbeidelse av årsregnskap og årsberetning på norsk som lite anvendelig for selskapet. I tillegg til at det er ressurskrevende, fører av og til tvil om oversettelse og uoverensstemmelser mellom engelsk og norsk versjon til unødvendige misforståelser.*

*Ettersom selskapets arbeidsspråk er engelsk vil alle ansatte forstå regnskapet og årsberetningen selv om disse dokumentene i fremtiden blir utarbeidet i sin endelige form på engelsk. Det samme vil være tilfelle for selskapets kunder og kreditorer. Ettersom engelsk også er bransjespråket innen sektorene de opererer i, kan vi heller ikke se at andre, mer tilfeldige regnskapsbrukere skulle ha noe behov for at regnskapet utarbeides på norsk. Selskapet mener derfor at alle brukere av regnskapet i sum vil være tjent med at regnskapet kun utarbeides på engelsk.*

En norsk utarbeidelse av årsregnskap og årsberetning vil kun ha til formål å tilfredsstille regnskapslovens språkkrav.



## Skattedirektoratets vurdering

Etter regnskapsloven § 3-4 tredje ledd skal årsregnskapet og årsberetningen være på norsk. Departementet kan ved forskrift eller ved enkeltvedtak bestemme at årsregnskapet og/eller årsberetningen kan være på et annet språk.

I Ot. prp. nr. 42 (1997-1998) Om lov om årsregnskap m.v., er det uttalt følgende om regnskapslovens formål, jf. pkt. 1.1:

*Regjeringen har som siktemål at regnskapsloven skal bidra til informative regnskaper for ulike grupper av regnskapsbrukere. Regnskapsbrukerne er dels investorer og kreditorer som tilfører kapital til foretakene, og dels andre grupper som har interesse av å vite hvordan foretaket drives, f.eks. de ansatte og lokalsamfunnet. Informasjonen til kapitalmarkedet skal gi grunnlag for riktig prising av finansielle objekter. Riktig prisdannelse på aksjer er en forutsetning for at ressursbruken i samfunnsøkonomien skal bli best mulig. Gode regnskaper vil også gjøre det vanskeligere for markedsdeltakere å ta ut spekulasjonsgevinster med basis i skjevt fordelt informasjon.*

Det fremgår således at et av hovedformålene med regnskapsloven er å bidra til "informative regnskaper for ulike grupper av regnskapsbrukere". Regnskapsbrukere vil omfatte, jf. uttalelsen i proposisjonen, blant andre investorer, kreditorer, ansatte og lokalsamfunnet.

Det er etter Skattedirektoratets vurdering derfor avgjørende ved vurdering av om dispensasjon fra kravet til å utarbeide årsregnskap og/eller årsberetning på norsk kan gis, at det ikke foreligger mulige brukere av regnskapsinformasjon som blir vesentlig berørt negativt ved en eventuell dispensasjon.

Som nevnt ovenfor er det særlig hensynet til brukerne av regnskapsinformasjon som skal vurderes ved en dispensasjonssøknad. I denne vurderingen har Skattedirektoratet lagt vekt på at selskapet er eid av et utenlandsk selskap. Eierkretsen er begrenset, og flere av styremedlemmene er utenlandske. I tillegg er selskapets virksomhet utpreget internasjonal, og arbeidsspråk er engelsk.

Vennligst oppgi vår referanse ved henvendelse i saken.

Med hilsen

Inger Helene Iversen  
seniorrådgiver  
Rettsavdelingen, foretaksskatt  
Skattedirektoratet

Henning Stokke

*Dokumentet er elektronisk godkjent og har derfor ikke håndskrevne signaturer.*