



ADOBE STATEMENT ON THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

Adobe is committed to ensuring workers' rights are protected and has taken steps to identify the risk of slavery and human trafficking taking place in our supply chains and in any part of our business.

Adobe is a member of the Electronic Industry Citizenship Coalition (EICC), commits publicly to the [EICC Code of Conduct](#) (Code) and actively pursues conformance to the Code and its standards as a total supply chain initiative. Adobe also requires suppliers to agree to our [Business Partner Code of Conduct](#) which includes abiding by our Labor Standards – Freely Chosen Employment, Child Labor Avoidance, Lawful Employment, Non-Discrimination or Harassment, Freedom of Association, Safe Conditions, Working Hours, and Wage and Benefits.

Verification

We evaluate and address risks of human trafficking and slavery through the EICC's Maplecroft Risk Assessment tool, the Supplier Self-Assessment Questionnaire (SAQ), and the Validated Audit Process (VAP).

The Maplecroft Risk Assessment tool is a third-party service that annually evaluates suppliers based on inherent risk, sector and location.

The EICC annual Supplier Self-Assessment Questionnaire (SAQ) is a tool used for Adobe to conduct its own due diligence by assessing our risk management systems to identify gaps for issues related to workers' rights and the environmental health of surrounding communities.

The Validated Audit Process (VAP) of EICC member facilities and their suppliers' facilities is completed by independent, third-party auditors specially trained in the Validated Audit Process (VAP) audit protocol, and social & environmental auditing. This helps to set consistent, industry-wide expectations.

Supplier Audits

The EICC Supplier Self-Assessment Questionnaire provides a risk score for suppliers based on issues identified in the risk management assessment. For all suppliers identified as high-risk, we will either conduct VAP audits, or obtain audit reports through EICC's audit sharing system. These audit reports are valid for two years. The tools referenced above help us decide which suppliers to audit by helping to identify risk levels for slave labor or human trafficking practices.

The Validated Audit Process assesses suppliers against the entire EICC Code, including: Labor, Health & Safety, Environment, Ethics, and Management Systems. It includes many different components, such as On-Site Inspections, Document Reviews, and Worker and Management Interviews.

Certification

Pursuant to Section E of the EICC Code, Adobe utilizes a management system that contains “a process to communicate the Code requirements and to monitor supplier compliance to the Code.”

In accordance with Adobe’s Business Partner Code of Conduct, where required, each business partner covered by the Adobe Business Partner Code of Conduct must have an authorized representative certify that he or she has read and understood the Code and commit the Adobe business partner to meet these standards.

Internal Accountability

Adobe takes noncompliance with the EICC Code on slavery and trafficking seriously. Adobe will investigate any alleged instances of nonconformance with the EICC code and will timely initiate corrective action plans, including appropriate disciplinary action for any identified violations of this policy.

The Adobe Business Partner Code of Conduct applies to Adobe business partners including but not limited to our distributors, resellers, solution and consulting partners, suppliers, vendors and service providers. Adobe may audit compliance with this policy or appoint a third party to conduct an audit. Any violations will be reported to the Adobe business partner’s management for their attention and, if appropriate, corrective action. It is the intention of Adobe to terminate its relationship with any business partner who does not comply with this Code of Conduct or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

Capacity-Building/Training

Adobe encourages suppliers to utilize EICC’s Learning Academy which contains online learning modules that cover the EICC Code of Conduct, as well as modules specifically related to the California Transparency in Supply Chains Act. In addition, there are modules on hiring and related topics that are particularly relevant to these issues. Modules can be assigned to both internal staff and suppliers and learning can be tracked.

The EICC Code is a part of our efforts to ensure that slavery and human trafficking are not taking place in our supply chains and our own business.

Adobe requires all internal employees to take a Code of Business Conduct training every 2 years. As part of this training, employees provide a written acknowledgement that they have read the Code and that they understand and will comply with the Code. We enroll all employees, including in our subsidiaries, in this training. Adobe suppliers may take the Adobe Business Partner Code of Conduct training which outlines similar provisions mentioned above.

Adobe liaises regularly with its supplier and conducts monthly visits to review the production area and the area where products are scrapped. While these visits are principally to check manufacturing and recycling practices, they are carried out by Adobe employees who have been trained in the Labor Standards and are expected to report anything which appears to contravene Adobe’s standards.

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