



Adobe Business Partner Code of Conduct

Critical to Adobe's identity and success is our foundation of integrity and honest and ethical conduct. Our foundation depends not only on our own employees but also upon our forming relationships with business partners that share our commitment to ethical business practices.

The Adobe Business Partner Code of Conduct articulates our own commitment and our expectations of our business partners. It also reflects our support for the Code of Conduct established by the Responsible Business Alliance (RBA) and the Ten Principles of the United Nations Global Compact.

We sincerely value our business partners who join us in pursuing these common goals of integrity and ethical business practices.

Shantanu Narayen

Chairman and Chief Executive Officer



Adobe expects its business partners to operate in full compliance with all applicable laws and regulations, and to adhere to the principles outlined in this Adobe Business Partner Code of Conduct. While conducting business with Adobe and its customers, Adobe business partners will conduct their business practices and activities in a responsible and ethical manner. The Adobe Business Partner Code of Conduct is not intended to replace, supersede, or conflict with any applicable laws, regulations, or contractual obligations with Adobe.

Compliance with the Business Partner Code of Conduct

Applicability

The Adobe Business Partner Code of Conduct applies to all Adobe business partners including but not limited to our distributors, resellers, solution and consulting partners, suppliers, vendors, and service providers.

Certification

Adobe business partners subject to the Adobe Business Partner Code of Conduct may be required to have an authorized representative certify that the representative has read and understood the Business Partner Code of Conduct and commits the Adobe business partner to these standards.

Monitoring and Compliance

Adobe may audit compliance with the Business Partner Code of Conduct 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. Adobe may terminate its relationship with any business partner who does not comply with the Business Partner Code of Conduct or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

Reporting Violations

Adobe business partners and other stakeholders may report suspected violations by submitting a report on the Adobe Business Ethics Hotline via the online web portal or a local telephone number, available at <https://www.adobe.com/about-adobe/integrity.html>. Adobe business partners will have the option to remain anonymous (to the extent permitted by applicable law), and all reports will be handled sensitively and in accordance with Adobe policies and applicable law.

Integrity and Compliance with the Laws

Anti-Corruption

Adobe is committed to conducting its business free from extortion, bribery and all unlawful, unethical, or fraudulent activity. Adobe business partners must not offer, give, promise, or authorize any bribe, gift, loan, fee, reward, or other advantage to any government official, government employee, customer, Adobe employee, or other person. Adobe business partners must also keep accurate and complete records of their transactions and must not falsify or conceal the improper use of Adobe funds. Adobe business partners must comply with all applicable international anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other similar international and local laws and regulations.

Conflicts of Interest

Adobe business partners must avoid any situation that may involve a conflict or the appearance of a conflict between their personal interests and the interests of Adobe. Adobe business partners must not offer or

provide lavish or overly frequent hospitality or entertainment or more than nominal gifts to any Adobe employee or client or their families. Adobe employees and their family members may not hold any significant economic interest in any entity that does business with Adobe and is not publicly traded, and business partners are required to avoid such relationships with Adobe employees.

Insider Trading

Adobe business partners must ensure that any non-public information obtained because of a relationship with Adobe is not used for the personal benefit of the business partner, their employees, or other persons.

Intellectual Property

Adobe business partners may only use Adobe's intellectual property, such as confidential information, trade secrets, copyrights, patents, and trademarks in a manner permitted under their contract with Adobe and the law and may not misappropriate or infringe the intellectual property rights of others. Adobe business partners must not misuse any trade secrets or confidential information of Adobe or of others for their own purposes or disclose such information to unauthorized third parties. Adobe business partners must notify Adobe if they become aware of any unauthorized use of the Adobe brands, trademarks, or logos by a third party.

Confidentiality

Adobe business partners must protect non-public Adobe information and not disclose it to any unauthorized third party and use it only for the business of Adobe as indicated by Adobe. This obligation to safeguard Adobe information continues after the engagement has ended.

Trade Compliance

Adobe business partners must comply with all applicable trade laws, including import and export laws, economic sanctions laws, and anti-boycott laws. As an Adobe business partner, you are responsible for understanding how global trade laws apply and are responsible for ensuring that no transactions involving Adobe or Adobe products and services violate trade laws.

Fair Competition

Adobe business partners must comply with all competition and anti-trust laws and must not participate in activities that have the effect of reducing or destroying competition. Prohibited conduct includes discussing or making agreements with competitors regarding prices, discounts, or terms to offer customers (price fixing), coordinating or working with competitors in a way that undermines the competitive bidding process (bid rigging), dividing up markets by region, product, or customer (market allocation), or otherwise unfairly excluding or foreclosing competitors from the marketplace or depriving customers of the benefits of competition.

Honest and Accurate Dealings

Adobe business partners must not make any false representations in connection with any Adobe transaction including, but not limited to, oral misrepresentations of fact or the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, forged letters of destruction, or any other false or inaccurate records.

Responsible Sourcing of Minerals

Adobe business partners must reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo or an adjoining country. Adobe business partners are expected to exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to their customers and Adobe upon request.

Artificial Intelligence

Adobe business partners must develop Artificial Intelligence (AI) solutions used for Adobe's products and services in a manner that complies with all regulations and voluntary codes.

Accessibility for People with Disabilities

Adobe business partners should ensure that ICT (Information and Communications Technologies), physical infrastructure, and hardware are designed and built in a manner which enables persons with disabilities to access necessary information and functionality. Adobe business partners supplying products and services for Adobe use

agree to provide current documentation indicating level of conformity with accessibility standards such as Section 508 of the United States Rehabilitation Act of 1973, WCAG 2.1 Level AA, and EN 301 549.

Governance

Adobe business partners are expected to develop a culture of compliance where they seek continuous improvement.

- **Risk Management:** Adobe business partners must have applicable business controls in place to detect and prevent unlawful conduct by their employees and agents. These business controls should be adequately resourced and routinely updated to account for the current risk environment.
- **Training:** Adobe business partners must have an adequate training program that ensures their employees and agents have the appropriate levels of knowledge and skills to maintain compliance with applicable laws, regulations, and standards.
- **Assistance:** Adobe business partners will assist Adobe with any investigation of a violation of the Business Partner Code of Conduct, Adobe policies or applicable law.

Labor Standards

Adobe expects its business partners to treat their employees fairly in accordance with local laws and regulations regarding labor and employment. Further, all business partners are expected to share Adobe's commitment to respect all human rights and provide equal opportunity as set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Core Labor Standards.

Child Labor Avoidance

Adobe business partners must not use child labor. The term "child" refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Adobe business partners should adopt procedures to verify the age of workers and maintain documentation. Adobe supports the development of legitimate workplace learning programs that comply with all laws and regulations. Workers under the age of 18 (Young Workers) must not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

Slavery and Human Trafficking Avoidance

Adobe regards all forms of slavery and human trafficking as unacceptable and strives to ensure that it plays no part anywhere within its business. Adobe is committed to ensuring that everyone it deals with is treated with dignity and respect and that the way it conducts its business and its dealings with business partners reflects its values and deters any form of modern slavery and human trafficking from occurring within its business and supply chain.

Adobe expects each of its business partners to share its commitment to respect for human rights and equality of opportunity in the workplace. Adobe expects each business partner to reflect this in their own employment practices to achieve full compliance with all applicable laws and regulations.

To meet these expectations, each business partner must:

- Take all reasonable steps to ensure that there is no slavery, servitude, forced or compulsory labor, or human trafficking occurring in its business or in its supply chains; and
- Comply with the relevant provisions of all applicable laws and regulations regarding modern slavery and human trafficking in the performance of its obligations under any agreement with Adobe.

Freely Chosen Employment

Employment with Adobe business partners should be an expression of free choice and there should be no forced, prison, bonded, or involuntary labor. Adobe business partners should allow workers to discontinue employment without penalty upon reasonable notice. Adobe business partners should not hold documentation, unless such

action is required by law, or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports, or work permits.

Lawful Employment

Adobe business partners must, prior to employing any worker, validate and review all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction.

Non-Discrimination or Harassment

Adobe business partners must commit to a workplace free of harassment and not discriminate on the basis of race, color, gender, gender identity or expression, sexual orientation, pregnancy, age, religion, disability, marital status, veteran status, national origin, citizenship, or any other status protected by applicable national or local law. Workers must be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Freedom of Association

Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. Adobe business partners must respect the legal rights of employees to form and join or to refrain from joining worker organizations, including trade unions. Adobe business partners have the right to establish favorable employment conditions and to maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

Safe Conditions

Adobe business partners must provide a safe and hygienic working environment for workers and provide appropriate safety equipment, free of charge, and training. Adobe business partners must allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

Working Hours

Adobe business partners must afford workers working hours that comply with applicable laws.

Wages and Benefits

Adobe business partners must provide wages, benefits, and overtime pay that comply with all local wage and hour laws and regulations including those relating to minimum wages, living wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Deductions from wages as a disciplinary measure must not be permitted.

Environmental Standards

At Adobe, we believe that we have a social responsibility to operate our business sustainably. Adobe expects that all partners and suppliers will share our commitment to protecting the environment by following the standards outlined below.

Environmental Permits and Reporting

Adobe business partners must obtain, maintain, and keep current all required environmental permits (e.g. stormwater discharge monitoring), approvals, and registrations and follow operational and reporting requirements.

Pollution Prevention and Resource Reduction

Adobe business partners must eliminate at the source or minimize through practices, emissions and discharges of pollutants and generation of waste. Business partners must conserve natural resources, including water, fossil fuels, minerals, and virgin forest products, through practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Hazardous Substances

Adobe business partners must identify, label, and manage chemicals, waste, and other materials posing a hazard to humans or the environment to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data must be tracked and documented.

Solid Waste

Adobe business partners must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). These data must be tracked and documented.

Air Emissions

Adobe business partners must characterize, routinely monitor, control, and treat, as required, prior to discharge air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion by-products generated from operations. Ozone-depleting substances must be effectively managed in accordance with applicable regulations. Business partners are to conduct routine monitoring of the performance of their air emission control systems.

Materials Restrictions

Adobe business partners must adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

Water Management

Adobe business partners must implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. Business partners must characterize, monitor, control and treat, as required, prior to discharge or disposal of all wastewater. Business partners must conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Energy Consumption and Greenhouse Gas Emissions

Adobe business partners must track, document, and publicly report all Scopes 1, 2 and relevant categories of Scope 3 greenhouse gas emissions and to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. And, as part of our Science-Based Targets (SBTs), business partners should consider implementing their own SBTs as well as 100% renewable energy goals and reporting against them.