



ADOBE STATEMENT ON THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

Pursuant to **Section 3 of the California Transparency in Supply Chains Act of 2010 and the United Kingdom (UK) Modern Slavery Act 2015, Chapter 30, Part 6, Provision 54**, Adobe states that we have taken steps during the financial year to identify the risk of slavery and human trafficking taking place in any of our supply chains and in any part of our business.

Adobe commits publicly to the **Responsible Business Alliance (RBA) [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 outlines necessary management systems to ensure workers' rights are protected and 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.

Our steps taken include,

1. **Verification**: We evaluate and address risks of human trafficking and slavery through conformance to the Code, Section A.I, which states, among other standards, that: Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. We pursue conformance by using the RBA's Maplecroft Risk Assessment tool, the Supplier Self-Assessment Questionnaire, and Validated Audit Process (VAP).
 - a. The Maplecroft Risk Assessment tool is a third-party service that evaluates risks with respect to the Code (including Section A.I) by inherent risk, sector and location.
 - b. The Supplier Self-Assessment Questionnaire (SAQ) is a self-evaluation that inquiries about demographics and existing policies at the facility level against all sections of the Code.
 - c. The VAP audits carried out on RBA member facilities and their suppliers' facilities are completed by independent, third-party auditors specially trained in social and environmental auditing and the VAP audit protocol. This helps to set consistent, industry-wide expectations.

We conduct these activities annually.

2. **Supplier Audits**: We either conduct VAP audits or obtain audit reports through RBA's audit sharing system, for suppliers scoring "high risk" on the SAQ. 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 VAP assesses suppliers against the entire RBA 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.

3. Certification: Pursuant to Section E of the RBA Code, Adobe utilizes a management system that contains "a process to communicate the Code requirements and to monitor supplier compliance to the Code." This does not mean that suppliers submit certifications.
4. Internal Accountability: Adobe takes noncompliance with the RBA Code on slavery and trafficking seriously. Adobe will investigate any alleged instances of nonconformance with the RBA Code, and will timely initiate corrective action plans, including appropriate disciplinary action, for any identified violations of this policy.
5. Capacity-Building/Training: Adobe encourages suppliers to utilize RBA's Learning Academy which contains online learning modules that cover the RBA 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 RBA Code is a fundamental part of our efforts to ensure that slavery and human trafficking are not taking place in our supply chains and our own business.

This disclosure includes the efforts Adobe has taken in our own business, as well as our suppliers, to oppose the use of slavery and human trafficking in our supply chain.

Adobe requires all its employees to take a Code of Business Conduct training every two 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 those 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.

Lisa Bugajski

Lisa Bugajski (May 5, 2020)

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Operations May 4, 2020