

**WRITTEN RESOLUTION OF THE BOARD OF DIRECTORS**

**OF**

**ADOBE SYSTEMS EUROPE LIMITED**

**(Registered number: SC101089)**

**(the “Company”)**

**Circulated to all eligible directors of the Company on 30 March 2018**

We, Tracy Hanson, Christian Keim and Keith San Felipe, being all eligible directors of the Company hereby, pursuant to the articles of association of the Company:

**DISCLOSURE UNDER THE UNITED KINGDOM MODERN SLAVERY ACT 2015**

**WHEREAS**, the United Kingdom has adopted the Modern Slavery Act 2015 (the “**Act**”);

**WHEREAS**, pursuant to Section 54 of the Act, the Company is obligated to prepare and publish on its website a slavery and human trafficking statement for each financial year of the Company (the “**Statement**”);

**WHEREAS**, the Company prepared and published on its website the Statement for the financial year ended 27 November 2015 (the “**2015 Statement**”), attached hereto as **Exhibit A**;

**WHEREAS**, the Company desires to publish on its website the Statement for its financial year ending 2 December 2016 and each financial year thereafter, for as long as the Act remains in effect; and

**WHEREAS**, the proposed Statement for the financial year ending 2 December 2016 (the “**2016 Statement**”) is attached hereto as **Exhibit B**.

**RESOLVED**, that the 2015 Statement be and is hereby approved, confirmed and ratified in all respects.

**RESOLVED FURTHER**, the Company hereby confirms and ratifies the signing of the 2015 Statement by Lisa Bugajski, Senior Director Product Delivery Operations, as actions for and on behalf of the Company.

**RESOLVED FURTHER**, that the 2016 Statement be and is hereby approved in the form attached to this resolution.

**RESOLVED FURTHER**, any Director or Directors be empowered, directed, authorised and appointed on behalf of the Company to execute the 2016 Statement.

**RESOLVED FURTHER**, any Director or Directors of the Company be empowered, directed, authorised and appointed on behalf of the Company to execute such other documents and do such other acts or deeds as he/she or they consider necessary or desirous in connection with or arising out of the publishing of the 2016 Statement.

**RESOLVED FURTHER**, in addition to the specific authorisations in the foregoing resolutions, any Director or Directors of the Company be authorised to take from time to time any and all such actions and to approve, issue, execute and deliver in the appropriate manner any and all Statements as may be deemed necessary, appropriate or advisable in the opinion of any such Director or Directors in order to comply with the Act.

The undersigned persons entitled to vote on the above written resolution hereby irrevocably agree to the above written resolution and signify such agreement in accordance with the articles of association of the Company (including by electronic signature or handwritten ink signature).

*Tracy Hanson*  
\_\_\_\_\_  
Tracy Hanson

Date: Mar 30, 2018

*Christian Keim*  
\_\_\_\_\_  
Christian Keim

Date: Mar 31, 2018

*Keith San Felipe*  
\_\_\_\_\_  
Keith San Felipe

Date: Mar 30, 2018

**DISCLOSURE FOR THE UK MODERN SLAVERY ACT AND 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 EICC Code of Conduct (Code) and is expected to actively pursue conformance to the Code and its standards as a total supply chain initiative.

The Code outlines necessary management systems to ensure workers' rights are protected.

Our steps taken include,

1. Verification: We evaluate and address risks of human trafficking and slavery through conformance to the Code, Section A.1, 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 EICC'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.1) 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 EICC 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 EICC'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 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.

3. 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.” This does not mean that suppliers submit certifications.
4. 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.
5. 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 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.

**X** *Lisa Bugajski*

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Lisa Bugajski  
Sr Director, Product Delivery Operations  
May 26, 2016

**ADOBE 2016 DISCLOSURE FOR THE UK MODERN SLAVERY ACT**

This is Adobe's statement made pursuant to Section 54 of the UK Modern Slavery Act 2015 for the financial year ending December 2, 2016.

Adobe is a multinational computer software company, headquartered in San Jose, California, United States.

Adobe outsources manufacturing and fulfillment to one vendor based in Singapore.

**Adobe Business Partner Code of Conduct**

Adobe requires all 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. These are summarized below.

**Freely Chosen Employment**

Employment with Adobe business partners should be an expression of free choice and there should be no forced, bonded or involuntary labor. Adobe business partners should allow workers to discontinue employment upon reasonable notice. Adobe business partners should not hold 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, unless such actions are required by law.

**Child Labor Avoidance**

Adobe business partners should not use child labor and Adobe business partners should adopt procedures to verify and maintain documentation that no workers are younger than the local legal age for completing compulsory education. Adobe business partners must follow all applicable local laws, regulations and standards concerning working hours and conditions for all workers. 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.

**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 not discriminate on the basis of race, color, gender, gender identity or expression, sexual orientation, age, religion, disability, marital status, veteran status, national origin, citizenship, or cultural, religious or personal beliefs.

**Freedom of Association**

Adobe business partners must respect the legal rights of employees to 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 and training.

**Working Hours**

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

**Wage 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, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

**Training**

Adobe requires all internal employees to take an annual Code of Business Conduct training, which includes training on Adobe’s Labor Standards described above. They receive a certification of completion at the end of the training that confirms they understand the policy.

*Lisa Bugajski*

Lisa Bugajski (Apr 2, 2018)

Signature

Date