January 1, 2012

Slavery and Human Trafficking Policy Statement

In 2010 the California Transparency in Supply Chains Act of 2010 (SB 657) was passed and will go into effect January 1, 2012. This law requires large retailers and manufacturers who do business in the state of California, and have gross worldwide sales of over $100 Million Dollars; to be transparent about the efforts they have undergone to eradicate Slavery and Human Trafficking in their supply chain.

As a member of EICC we have shown our commitment to environmental and social responsibility. Since 2004 the EICC has built upon the Code of Conduct which prohibits the use of forced, bonded, indentured labor or involuntary prison labor. We audit our suppliers to this code and take seriously all forms of non-conformance. The EICC also has a Freely Chosen Employment (FCE) task force designed to help identify opportunities to share best practices among members, expand the code of conduct, and make recommendations on available tools and training.

In addition to the EICC, Adobe Systems Incorporated has internal policies and practices that are based on international labor and human rights standards. We partner with our supply chain to create an environment where workers have the right to freely choose employment, the right to associate freely, voluntarily join or not join labor unions and worker councils, and the right to bargain collectively if they choose. Workers also have the right to a workplace free of harassment and unlawful discrimination.

This focus on slavery and human trafficking is part of a larger effort of supply chain transparency and accountability. Adobe Systems Incorporated has taken multiple actions to ensure and verify the absence of forced labor, slavery and human trafficking in our supply chain, include the following:

- **Adobe Business Partner Code of Conduct:**
  The Adobe Business Partner Code of Conduct articulates Adobe’s foundation of integrity and honest and ethical conduct. Adobe upholds standards that require business partners to treat their own employees fairly in accordance
with local laws and regulations regarding labor and employment, including slavery and human trafficking in our supply chain.

- **Internal Supplier Audits:**
  Adobe's audit program evaluates suppliers’ compliance with the EICC, which prohibits forced labor and child labor. Audits are performed at least once a year by Adobe employees who make scheduled visits to the suppliers. Audits are announced and conducted independently of the supplier.

- **Certify Materials incorporated into the product comply with the laws regarding slavery:**
  Adobe’s ODM (original design and manufacturing) suppliers comply with the Adobe Business Partners Code of Conduct, requiring them to comply with international standards and applicable laws and regulations regarding forced labor and child labor. Suppliers also maintain their own zero tolerance policies for forced labor, slavery and human trafficking.

- **Maintains internal accountability standards:**
  In order to maintain internal accountability, it is the intention of Adobe to discontinue its relationship with any Adobe business partner who does not comply with the Adobe Business Partner Code of Conduct or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

  **Procurement professionals training:**
  Adobe requires that employees responsible for supply chain management complete a training course on how to recognize the potential risks of human trafficking in a business and identify actions that can be taken to address them.

For complete information concerning our supply chain responsibility program, see [Supply Chain Responsibility](#).