Adobe Code of Ethics

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Scope

This policy applies to certain senior officers of Adobe, including the principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions, and such other personnel as are designated from time to time by the Board of Directors (the "Senior Officers").

Purpose

The purpose of this policy is to deter wrongdoing and promote:

- **Honest and Ethical Conduct.** All Senior Officers shall perform their duties in an honest and ethical manner. They shall handle all actual or apparent conflicts of interest between personal and professional relationships in an ethical manner. If a Senior Officer becomes aware of a conflict of interest, of any material transaction, or relationship that reasonably could be expected to give rise to a conflict of interest, or has a question as to a potential conflict of interest, the Senior Officer must consult with the Corporate Compliance Officer or the General Counsel. If a Senior Officer becomes involved in a situation that gives rise to an actual conflict of interest, the Senior Officer must inform the Corporate Compliance Officer or the General Counsel of such conflict.

- **Full, Fair, Accurate, Timely, and Understandable Disclosure.** Senior Officers shall provide, or cause to be provided, full, fair, accurate, timely, and understandable disclosure in reports and documents that Adobe files with, or submits to, the Securities and Exchange Commission, and in other public communications made by Adobe.

- **Compliance with Governmental Laws, Rules, and Regulations.** Each Senior Officer shall comply with applicable governmental laws, rules, and regulations.

Publication of the Code of Ethics

Adobe's Code of Ethics will be disclosed as required by applicable laws and regulations.

Changes or Waivers in the Code of Ethics

Any change in or waiver of any provision of this Code of Ethics shall require approval of the Audit Committee and shall be publicly disclosed in the time period and manner as required by law or regulation.
Internal Reporting of Violations

Employees of Adobe, including each of the Senior Officers, shall bring any instance, occurrence, or practice that they, in good faith, believe is inconsistent with or in violation of this Code of Ethics to the attention of the Corporate Compliance Officer or the General Counsel or if such person is involved in the matter giving rise to the conflict, Adobe’s Audit Committee.

Employees should use common sense and good judgment and act in good faith. Employees who become aware of a suspected violation, should not attempt to investigate it or resolve it on their own. Prompt disclosure to the appropriate parties is vital to ensuring a thorough and timely investigation and resolution. A violation of this Code of Ethics is a serious matter and could have certain legal implications. Reports of suspected violations should always be made in good faith.

When an alleged violation of the Code of Ethics for Senior Officers is reported, Adobe shall take prompt and appropriate action in accordance with the law and regulations and otherwise consistent with good business practice. All actions or investigations in response to a violation shall be documented, as appropriate.

No person who in good faith reports a violation, or suspected violation of this Code of Ethics, shall be retaliated against. Persons who retaliate in violation of this policy may be subject to civil, criminal, and administrative penalties, as well as disciplinary action, up to and including termination of employment.

Consequences for Non-Compliance with the Code of Ethics

The Audit Committee shall be responsible for determining and implementing the appropriate disciplinary action for any violation of this Code of Ethics. Any violation of applicable law or any deviation from the standards embodied in this Code of Ethics may result in disciplinary action up to and including termination of employment.

Certification

The Senior Officers shall acknowledge and certify to the foregoing annually, in a form and manner acceptable to Adobe, and file a copy of such certification with the Audit Committee.