ADOBE 2024 STATEMENT FOR THE UK MODERN SLAVERY ACT

Adobe Systems Software Ireland Ltd ("Adobe Ireland", "we" or "us") prepared this statement in pursuant to Section 54 of the UK Modern Slavery Act 2015 ("Modern Slavery Act") for the financial year ending November 29, 2024.

Our Structure, Operations and Supply Chains

As part of one of the largest and most diversified global technology companies, Adobe Ireland is committed to changing the world through personalized digital experiences. Our solutions help unleash creativity, accelerate document productivity and power businesses in a digital world. We have a diverse user base that includes consumers, communicators, creative professionals, developers, students, small and medium businesses and enterprises. We firmly support and comply with the anti-slavery and human trafficking laws in the countries in which we do business.

Adobe Ireland is part of the Adobe group of companies sitting under our parent entity, Adobe Inc., which is an American publicly-traded company incorporated in Delaware, headquartered in San Jose, California, and listed on the Nasdaq Stock Exchange. In this statement, we refer to the Adobe group of companies globally as the "Adobe Group" and a company within the Adobe Group as an "Adobe Group Entity".

Adobe Ireland oversees a supply chain that includes approximately 550 indirect vendors. These vendors provide marketing services, technology products and services, non-technology professional services, sales services, human resources and facilities services.

Adobe Ireland sells Adobe packaged software, software licenses and services. Adobe Ireland does not have manufacturing operations. The limited physical production and distribution activities of certain Digital Media solutions sold by Adobe Ireland are produced by a supplier in Singapore. Adobe Ireland evaluates its supply chain to identify any partners and suppliers that might pose risks for illegal or unethical behavior such as engaging in human trafficking, slavery, forced labour or other human rights violations.

The Adobe Group, which includes Adobe Ireland, is committed to taking action to assess and address modern slavery risks in its operations and supply chain. The measures described in this statement are part of the global approach taken by the Adobe Group.

Governance Policies and Codes

To support compliance and address modern slavery risks throughout our business, the Adobe Group has in place the following governance programs, policies and codes within our ecosystem.

POLICIES and CODES	ACTIONS
Adobe Code of Business Conduct	• Adobe's Code of Business Conduct describes the Adobe Group's commitment to integrity as a fundamental part of the Adobe Group's culture and how we do business. The Code of Business Conduct is based on the Adobe Group's Company Values: Create the Future, Own the Outcome, Raise the Bar, and Be Genuine; the latter value includes acting with sincerity, integrity, and highest of ethics. The Adobe Group's commitment to being genuine is how we maintain trust and credibility with our employees, customers, business partners, stockholders, and communities where we operate. • All Adobe Group personnel are required to complete a Code of Business Conduct training every 24 months. As part of the training, employees certify that they have read the Code of Business Conduct and that they understand and will comply with it. Adobe Group employees are held accountable for their actions and are subject to disciplinary action for failing to adhere to the Code of Business Conduct. • The Adobe Group also maintains company-wide accountability and grievance mechanisms (such as Adobe's Business Ethics Hotline), which are available to both employees and external business partners, customers and suppliers to raise any concerns regarding unethical or illegal conduct, including where they relate to modern slavery and human trafficking.
Adobe Business Partner Code of Conduct	• The Adobe Group supports the Responsible Business Alliance ("RBA") Code of Conduct ("Code") and the Ten Principles of the United Nations Global Compact ("UNGC"), and actively pursues conformance to them as a total supply chain initiative. The Adobe Group communicates these expectations to our business partners and suppliers through the Adobe Business Partner Code of Conduct, which outlines necessary management systems to ensure workers' rights are protected and includes abiding by its Labour Standards– Freely Chosen Employment, Child Labor Avoidance, Slavery and Human Trafficking Avoidance, Lawful Employment, Non-Discrimination or Harassment, Freedom of Association, Safe Conditions, Working Hours, and Wage and Benefits. • The Adobe Group requires all business partners and suppliers to agree to our Business Partner Code of Conduct or have an equivalent policy. Under the Adobe Partner General Terms, our business partners and suppliers must comply with the principles in the Adobe

	Business Partner Code of Conduct. Additionally, contractual terms with suppliers also require that the suppliers do not utilise child, slave, prisoner or any other form of forced, bonded or involuntary labour, or engage in abusive employment or corrupt business practices, in the supply of goods or provision of services.
Global Human Rights Policy	• The Global Human Rights Policy describes the Adobe Group's commitment to respecting the human rights of our employees, business partners and customers. Adobe Group is committed to respecting employees' fundamental rights at work and upholding standards that require our business partners to do the same and treat their employees fairly in accordance with local laws and regulations regarding labor and employment. Additionally, the Adobe Group complies with applicable global data protection and privacy laws to protect confidential information that is entrusted to us by customers, employees and business partners.

Modern Slavery Risks in our Operations and Supply Chains

How We Identified Modern Slavery Risks

Adobe Ireland mapped out the modern slavery risks in our operations and supply chains. We have also had the benefit of the information in the Global Slavery Index 2023 published by Walk Free ("Global Slavery Index") to inform our identification of modern slavery risks.

In 2022, the Adobe Group completed a Human Rights Impact Assessment ("HRIA"). The objective of the HRIA is to help the organization effectively manage human rights impacts, thereby mitigating compliance, reputation and business risk. The HRIA considered the full scope of Adobe Group's activities, including all operations, products and services, as well as business relationships, to identify the most salient human rights risks in relation to workers in the supply chain, employees and contractors, data subjects, end-users and customers, and operating communities and society. The assessment was guided by the methodology of the United Nations Guiding Principles on Business and Human Rights and other key international standards.

Modern Slavery Risks Identified

Entity risks – The Adobe Group conducts a prioritized, risk-based assessment on all its suppliers and applies an additional level of risk assessment on suppliers providing manufacturing services. Adobe Ireland's supplier in Singapore completes an annual risk assessment utilizing the self-assessment tool available through the RBA. This supplier uses the SAQ to self-assess risks in its management systems and identify gaps related to, among other topics, workers' rights and environmental related issues.

Geographic risks – The Adobe Group has a list of higher-risk countries based on the Corruption Perception Index, which it refers to when considering risks in its supply chains. We have a supplier for our Digital Media solutions in Singapore. As assessed by the Global Slavery Index, Singapore has below average vulnerability to modern slavery for the Asia and the Pacific region and are scored above average for the regional government response to modern slavery.

Sector risks – Adobe Ireland procures facilities services, which include cleaning services. We are aware that cleaning services by their nature are recognised as a higher risk sector due to the industry's reliance on lower skilled and (often) migrant workers. However, the Adobe Group has conducted a risk assessment on our global cleaning services provider. Based on the supplier's own internal modern slavery policies and practices, our cleaning services provider is not categorized as high risk. The risk assessment is conducted periodically to verify the risk level.

Product and services risks –Adobe Ireland procures Information Technology ("IT") products and services. Some IT products and services may be higher risk due to the way in which they are manufactured, such as by using lower skilled labour. Furthermore, working conditions in the manufacturing supply chain were identified as a salient risk through the HRIA.

Assessing and Addressing Potential and Actual Modern Slavery Risks

The Adobe Group, which includes Adobe Ireland, is committed to taking action to assess and address modern slavery risks. The measures described in this section are part of the global approach taken by the Adobe Group.

Supplier Screening

The Adobe Group maintains company policies and procedures to guide its actions and establish operating controls to minimise risk exposure for the corporate group. The supplier due diligence procedure sets out the process for onboarding new suppliers and contains the actions required before Adobe Group Entities can do business with any supplier. The procedure ensures that the Adobe Group has reviewed any identified risks in the relationship or services and the relevant Adobe Group Entities have taken the appropriate measures to address those risks.

Adobe's Vendor Risk Management Office ("VRMO") is responsible for managing this program and collaborates with Adobe's Ethics & Compliance Office to conduct due diligence activities on suppliers using a risk-based approach.

The program incorporates, among other requirements, supplier screening and re-screening risk assessments to understand the qualifications and associations of the Adobe Group's suppliers. As part of the Adobe Group's supplier onboarding process, suppliers are asked to:

- Complete a compliance questionnaire and a formal declaration as well as provide required documentation via Adobe's Vendor Information Management Portal;
- Acknowledge abidance by the Adobe Business Partner Code of Conduct, which requires that they comply fully with key principles such as observing and complying with local and international laws and regulations relating to human rights and labour as well as anti-corruption and anti-bribery, commitment with environmental standards, and requirements on the use and disclosure of any personal information in delivery of services; and
- Disclose any known conflict of interest.

The Adobe supplier ethics and compliance review additionally requires suppliers to certify key information regarding their enterprise/business, compliance practices and policies. The Adobe Compliance Office may conduct enhanced due diligence based on the declarations provided by the suppliers, independent third-party intelligence tools, or other information related to the suppliers.

Suppliers are re-screened periodically in accordance with their previous risk rating and are required to provide an updated compliance questionnaire and a company declaration to the Adobe Group.

Supplier Contracting

The Adobe Group includes specific language in our third-party contracts requiring suppliers to comply with the Business Partner Code of Conduct. The Business Partner Code of Conduct sets out the Adobe Group's expectations for our business partners, suppliers, vendors, contractors, consultants and all other providers of goods and services to conduct business responsibly, with integrity, honesty and transparency, and to comply fully with key principles, including respect for human rights and compliance with local and international principles and laws relating to human rights, including regulations regarding avoidance of modern slavery and human trafficking.

Additionally, contractual terms with suppliers also require that the suppliers do not utilise child, slave, prisoner or any other form of forced, bonded or involuntary labour, or engage in abusive employment or corrupt business practices, in the supply of goods or provision of services.

Supplier Monitoring

The Adobe Group has taken steps to identify the risk of slavery and human trafficking taking place in any part of our supply chains and in any part of our business.

The steps taken by the Adobe Group for direct suppliers that produce our products include:

1. Verification: The Adobe Group evaluates and addresses risks of human trafficking and slavery through conformance to the RBA Code, Section A.I, which states, among other standards, that forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. They pursue conformance by using the RBA's Risk Assessment tools, the SAQ and Validated Audit Process ("VAP").

    a. The corporate and facility-level SAQs are a self-evaluation that inquire about demographics and existing policies, controls and performance against all sections of the Code to evaluate risks.
    b. The VAP carried out on RBA member facilities and their suppliers' facilities is 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.

    The Adobe Group conducts the SAQ activity annually.

2. Supplier Audits: The Adobe Group either conducts VAP audits or obtains 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 SAQ referenced above inform which suppliers the Adobe Group audits by helping to identify risk levels, taking into consideration slave labour or human trafficking practices. The VAP assesses suppliers against the entire RBA Code, including: Labour, 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 utilises 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: The Adobe Group takes non-compliance with the RBA Code on slavery and trafficking seriously. The Adobe Group will investigate any alleged instances of non-conformance with the RBA Code and, in line with our commitment to swift and effective remediation, will initiate corrective action plans in a timely manner, including appropriate disciplinary action, for any identified violations of this policy.
5. Capacity-Building/Training: The Adobe Group encourages suppliers to utilise RBA's Learning Academy which contains online learning modules that cover the RBA Code of Conduct, as well as modules specifically related to modern slavery, human trafficking and forced labour. 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 the Adobe Group's efforts to help mitigate the risk of slavery and human trafficking taking place in our supply chains and business.

In 2024, 100% of Adobe Group's suppliers that produce our products completed a SAQ and zero of those suppliers scored high risk on the SAQ. Additionally, there were zero reported cases of alleged instances of non-conformance with human trafficking or modern slavery practices.

The Adobe Group liaises regularly with the direct supplier and conducts quarterly 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 expected to report observations of potential violations of child labour or slavery. No suspected violations of labour standards have been reported.

How We Measure the Effectiveness of What We are Doing

Adobe Ireland has identified actions and outcomes on which we assess the effectiveness of our program.

Type of Activities	Action	Outcomes
Procurement activities	Assessing suppliers using RBA Risk Assessment tools, SAQ and VAP	Adobe Group has a better understanding of our supply chain and risks
	Conducting risk assessments of Adobe Group's suppliers during	Adobe Group has a better understanding of our supply chain and risks

	the onboarding process and at scheduled intervals during our engagement	
	Requiring suppliers to certify key information about their compliance practices and policies	Suppliers better understand Adobe Group's expectations of business conduct
	Having contractual terms requiring compliance with laws and that no forced, bonded or involuntary labour be used	Suppliers better understand Adobe Group's expectations in relation to modern slavery
Capacity building and awareness raising	Encouraging suppliers to use RBA's Learning Academy, which includes modules on the RBA Code of Conduct and modern slavery	Suppliers have a better awareness of the RBA Code of Conduct and understand Adobe Group's expectations in relation to modern slavery
	Requiring Adobe Group employees to undertake Code of Business Conduct training	Our employees better understand the expectations in the Code of Business Conduct
Supplier activities	Liaising with suppliers and conducting quarterly visits of suppliers providing production services	Suppliers have better awareness of Adobe's expectations through increased engagement
Policies and procedures	Implementing the Adobe Code of Business Conduct, Global Human Rights Policy and Adobe Business Partner Code of Conduct	Employees, suppliers and customers have a better awareness of Adobe Group's expectations
Human rights impact assessment	Identifying our most salient human rights risks and evaluating our policies and practices to address those risks	Adobe Group has awareness of potential areas for further control and improvement