



Adobe Code of Business Conduct

Doing business with integrity worldwide

Integrity has always been at the heart of Adobe's culture. While our business has transformed dramatically over the decades, our commitment to operating with the highest ethical standards has remained constant.

Adobe's Code of Business Conduct outlines the principles that guide our interactions with employees, customers, partners, stockholders, and communities. We hold ourselves to these principles in everything we do. We strive to communicate openly and honestly, to act fairly and responsibly, and to foster a vibrant, safe, and diverse work environment.

In simple terms, our Code reflects our promise always to do the right thing. It is a key reason we are among the world's most admired companies, and it is vital to our ongoing success.

Shantanu Narayen
Chair and Chief Executive Officer

Table of Contents

- 1. Overview**
- 2. Our Company Values**
 - 2.1. How to Report Suspected Violations
 - 2.2. No Retaliation
 - 2.3. Cooperating with Investigations
- 3. Our Workplace**
 - 3.1. Protecting Against Discrimination and Harassment
 - 3.2. Maintaining a Safe and Healthy Workplace
 - 3.3. Ensuring Proper Use of Adobe's Assets
 - 3.4. Safeguarding Confidential Information
- 4. Our Individual Conduct**
 - 4.1. Avoiding Conflicts of Interest
 - 4.2. Prohibition on Insider Trading
 - 4.3. Social Media and Public Speaking
- 5. Our Business Relationships**
 - 5.1. Fair Dealing
 - 5.2. Open and Fair Competition
 - 5.3. Data Protection and Privacy
 - 5.4. Working with Government Customers
 - 5.5. Maintaining Accurate Books and Records
 - 5.6. Document Retention
 - 5.7. Financial Reporting
- 6. Our Community**
 - 6.1. Global Trade Regulations
 - 6.2. Anti-Corruption Compliance
 - 6.3. Charitable Donations
 - 6.4. Public Policy Engagement and Political Contributions
 - 6.5. AI Ethics
 - 6.6. Sustainability
- 7. Compliance with the Law**
- 8. Violations**
- 9. Waivers**
- 10. Responsibility and Related Documents**

1. Overview

This Code establishes the principles of business conduct that Adobe considers fundamental in our operations worldwide.

This Code applies to all Adobe personnel, including the Adobe Board of Directors, any regular employee, Adobe-paid temporary employee, contingent worker (which includes agency temporary employees, independent contractors, and vendor employees), and intern of an Adobe group company.

You are expected to comply with this Code any time you perform work for Adobe, represent the company, or participate in company-sponsored events, whether you are on or off Adobe's premises.

This Code does not list every legal or ethical issue that you may face during business; rather, it is meant to guide your actions and be applied using your common sense and good judgment. If you face a situation that is not covered by this Code, ask yourself these questions to guide your actions:

- Is it legal according to the spirit, as well as the letter, of any law that may apply?
- Is it ethical and consistent with the principles set forth in this Code and other Adobe policies?
- Would you want your actions reported publicly?
- What would your family, friends, manager, and co-workers think of your actions?
- Could there be any direct or indirect negative consequences for Adobe?

2. Our Company Values

Acting with integrity is a fundamental part of Adobe's culture and how we do business. Our commitment to being fair and honest is how we maintain trust and credibility with our employees, customers, business partners, stockholders, and communities where we operate.

At Adobe, we embrace these company values:

**Create
the future.**

Creativity is in our DNA. We constantly look around the corner to see what is possible. But we don't wait for the future, we create it.

We are builders, makers, and inventors, driven by a deep empathy for our customers and users.

We are open-minded and celebrate new ideas. We have the courage to disrupt the market and ourselves through bold bets and ideas we turn into reality.

**Own the
outcome.**

We think and operate like owners. We take initiative, have a bias toward action, and assume ownership for end results, not just our part.

We are reliable and have clear points of view. We're decisive and learn from our mistakes.

**Raise
the bar.**

We aim high and we play to win. We relentlessly focus on execution, celebrate excellence and are intellectually honest about where we must do better.

We deliver both speed and quality by doing fewer things better. Our success is measured by the success of our customers and users.

**Be
genuine.**

The ability to be yourself is core to who we are. We embrace and respect diversity.

We support and challenge each other by being honest and direct. We always act with sincerity, integrity and the highest of ethics.

We do this for our employees, partners, customers, and communities.

2.1. How to Report Suspected Violations

As part of adhering to the principles outlined in this Code, you are required to promptly report any circumstances you become aware of that may be inconsistent with or in violation of this Code. No retaliation will be taken against you for reporting a suspected violation that you honestly, reasonably believe to be true. Your communication will be handled impartially, diligently, and with discretion, and kept in confidence to the extent appropriate and permitted by law and Adobe policies.

There are several ways that you can report a suspected violation of this Code or any other Adobe policies. You may:

- Discuss with your manager.
- Speak with an Adobe Legal representative or a member of Adobe's Employee Resource Center ("ERC") by [submitting a case](#) via the Support Center.
- Contact the Compliance Office at Integrity@adobe.com.
- Submit a report on the Adobe Business Ethics Hotline via the online web portal or a local telephone number at <https://www.adobe.com/about-adobe/integrity.html>. You will have the option to remain anonymous (to the extent permitted by applicable law), and all reports will be handled sensitively and in accordance with Adobe policies and applicable law.
- For more information and hotline instructions, visit the [Integrity page](#) on Inside Adobe. You may ask at any time to submit your report in a face-to-face meeting (so long as local safety measures permit such meetings).

You should always seek to report to someone who you believe is neutral and not directly involved in the conduct you are concerned about. Your prompt disclosure to the appropriate parties is important. It enables Adobe to handle the matter in the best way possible and provide a thorough and timely resolution. If you believe Adobe has not taken appropriate action in response to your reported concerns, you should report this to the Adobe Compliance Office. Additionally, people managers must immediately report any potential violations they witness or become aware of, and any complaints they receive about such conduct.

Reports of suspected violations must always be made based on an honest, good-faith belief. Employees who become aware of a suspected violation should not attempt to investigate it or take action on their own.

Reporting through internal channels before reporting through external channels is encouraged, but nothing in this policy prevents you from reporting possible violations of applicable law or regulation to a governmental agency or entity, which may be protected under the whistleblower provisions of applicable law or regulation. You do not need the prior authorization of Adobe to make any such reports or disclosures, and you are not required to notify Adobe that you have made such reports or disclosures.

2.2. No Retaliation

Adobe will not retaliate against you for raising any concerns or potential violations of Adobe policies, including this Code, that you honestly and reasonably believe to be true, or where you otherwise provide truthful information to assist in an investigation of such issues. Retaliation is prohibited by our company policies, and anyone who retaliates may be subject to civil, criminal, and administrative penalties, as well as disciplinary action including termination of employment or affiliation with Adobe.

2.3. Cooperating with Investigations

Adobe takes seriously any concerns and allegations of misconduct. Adobe will promptly investigate any reported violations or potential violations of its policies and take corrective action as needed.

Your full cooperation in any Adobe investigation is expected and will enable us to properly investigate these matters. This includes making yourself available to talk to an investigator, responding to Adobe's questions with candor, and

BUSINESS ETHICS HOTLINE

- Call 1-800-300-1026 within the U.S. and Canada

You will have the option to remain anonymous to the extent permitted by applicable law.

All reports will be kept in confidence to the extent appropriate and permitted by law and Adobe policies.

RELATED RESOURCE

[Code of Ethics Policy](#)

RELATED RESOURCE

[Non-Retaliation Policy](#)

providing complete and accurate information to Adobe. You must never alter or destroy records in response to any actual or anticipated investigation, litigation, or audit.

Adobe will keep its discussions and actions confidential to the extent appropriate and permitted by law and Adobe policies. However, over the course of an investigation, Adobe may find it necessary to share information with others inside and outside of Adobe on a “need to know” basis.

If you have questions about whether the issue you have raised is being appropriately addressed, you are always invited to contact the Adobe Compliance Office. You can be assured that Adobe will not retaliate against you for reporting an honest, reasonable concern or for participating in an Adobe investigation.

3. Our Workplace

We believe that when people are respected and included, they are more creative, innovative, and successful. To this end, we follow principles of equal employment opportunity and are committed to providing a safe, creative, and productive work environment for all personnel.

3.1. Protecting Against Discrimination and Harassment

We believe that everyone has the right to be treated with dignity and fairness. We do not tolerate unlawful discrimination or harassment against anyone based on race, ethnicity, color, religion, gender, gender identity or expression, marital status, age, disability, veteran status, sexual orientation, national origin, citizenship, or other classification protected by applicable law.

We protect our personnel from harassment and any other conduct that may foster an offensive or hostile work environment. This includes unwelcome or unsolicited sexual advances, threats of physical harm or violent behavior, and use of discriminatory slurs or inappropriate remarks or jokes. This protection applies whether the conduct occurs on Adobe's premises, at off-site business meetings, or through email, voicemail, text, direct message, apps, or other types of communication.

We will promptly investigate any reports of harassment, discrimination, or workplace violence and take corrective action as needed.

3.2. Maintaining a Safe and Healthy Workplace

The safety and security of all employees, contingent workers, and visitors is of paramount importance to Adobe. Current laws, legislation, and regulations (collectively "Safety Regulations") require employers, their representative management, and employees to consider safety and security a joint responsibility. All levels of the Adobe organization will cooperate to ensure that safety and security is integral to how we work at Adobe. Adobe will maintain statements of policy regarding health, safety, security, and welfare at work and effectively enforce those policies.

Adobe does not permit anyone to be under the influence of illegal drugs or intoxicants, including the inappropriate use of lawful medications or the use of recreational drugs when conducting Adobe business, representing the company, or attending company-sponsored events.

While some drugs are legal for recreational or other consumption in specific locations and circumstances, Adobe does not allow their use in any form in the workplace, during work events, or in any manner where they will affect your work performance. When representing Adobe, alcohol should only be consumed as part of company-sponsored events and should never be consumed to excess.

Adobe strives to be a tobacco-free workplace. We do not allow anyone to use tobacco products that emit smoke or vapor on Adobe's premises, either indoors or outdoors.

Adobe does not tolerate violent behavior, threats of violence, or acts of aggression, including in online platforms. We do not allow anyone to sell or possess dangerous weapons, real or replicas, on Adobe's premises or when conducting Adobe business, representing the company, or attending company-sponsored events. Firearms are prohibited, except in limited circumstances where Adobe is required by law to allow the possession of firearms and provided such firearms are handled according to all applicable legal requirements and Adobe policies.

RELATED RESOURCES

[Global Harassment & Discrimination Policy](#)

[Equal Employment Opportunity Policy*](#)

[Reasonable Accommodation Policy*](#)

* For U.S. and Canada. Check Inside Adobe for other country specific policies or contact the Employee Resource Center by [submitting a case](#) via the Support Center.

RELATED RESOURCES

[Drug-Free Workplace Policy](#)

[Facilities Usage Policy](#)

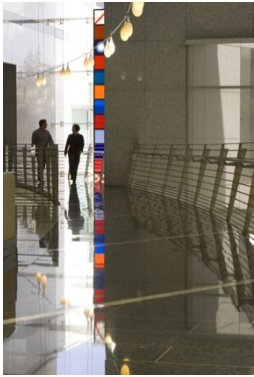
[Safety Policy Statement](#)

[Global Health & Safety Plan](#)

[Tobacco-Free Workplace Policy](#)

[Violence Prevention Policy](#)

[Workplace Violence Prevention Plan](#)



3.3. Ensuring Proper Use of Adobe's Assets

RELATED RESOURCES

[Business Travel & Expense Reimbursement Policy](#)

[Electronic Communications & Technology Usage Policy](#)

[Software Management Standard](#)

We expect all personnel to protect Adobe's assets and use company resources only to perform legitimate business functions (and for reasonable personal purposes, as allowed by Adobe's policies). This means you may not use Adobe's assets for any function that you are not authorized to perform, for any illegal purpose, or for any matter that violates the letter or spirit of this Code or other Adobe policies.

You are responsible for any Adobe assets that are under your control. It is important that you avoid any unauthorized use, alteration, destruction, disclosure, distribution, theft, waste, or other carelessness when handling Adobe's assets. The improper use of Adobe's assets may expose both you and Adobe to legal liability and damaged reputation, and result in disciplinary action, including termination of your employment or affiliation with Adobe.

Adobe's assets include tangible assets (such as office equipment) and intangible assets (such as software programs; patents, trademarks, and copyrights; and proprietary and confidential information).

Company Funds: If you are authorized to use Adobe funds, you are expected to spend wisely and follow all applicable procedures. You should avoid waste and verify that Adobe gets proper value for any services or products that you purchase. For example, if you have a company credit card for business travel and expenses, you may only use it for the types of expenses permitted by Adobe policies and you are responsible for submitting proper documentation for reimbursement.

Electronic Equipment: Adobe provides electronic equipment and network access, such as computers, telephones, and e-mail and voicemail services, to enable our workforce to be productive and efficient in their jobs. Any information pertaining to Adobe stored on personally-owned equipment and any information stored on Adobe-supplied equipment or any third-party account created using an Adobe email address (for example, an address ending with "@adobe.com"), may be monitored, accessed, or reclaimed by Adobe as necessary to meet business or legal requirements, as permitted by law and in accordance with our [Electronic Communications and Technology Usage Policy](#) and [Employee Privacy Policy](#).

Copyrighted Material: You are responsible for confirming that Adobe has the appropriate rights before you use, make copies of, transfer (externally or internally), or resell any copyrighted materials. Third-party software is an example of copyrighted material. You must ensure that any third-party software you use is properly licensed and only used in accordance with the licensing agreement and relevant Adobe policies. Copyrighted materials also include software, manuals, articles, books, and databases. Please contact the Adobe Legal department for more guidance with respect to copyrighted material.

3.4. Safeguarding Confidential Information

You must protect all confidential information concerning Adobe, as well as any confidential information entrusted to Adobe by third parties. You also must never inappropriately disclose another party's confidential information to Adobe.

Adobe's Confidential Information: You should never disclose confidential information unless you are authorized by Adobe or providing information to governmental authorities in accordance with law. Your duty to safeguard confidential information also applies to communications with your family members and friends and continues even after your employment relationship with Adobe ends.

Adobe's confidential information includes all non-public information that might be useful to competitors or otherwise harmful to Adobe if disclosed, such as:

- trade secrets
- software programs, including source and object code
- designs, inventions, ideas, know-how, processes, and techniques
- information about new products, marketing plans, product roadmaps, and product release dates
- research and development efforts
- business trends and projections
- information about existing or potential contracts, orders, and transactions
- information about existing or potential employees, business partners, suppliers, and customers (including personal information)
- information about Adobe's current and targeted financial performance (except what has been publicly disclosed)
- information relating to potential acquisitions by or of Adobe
- investments and divestitures



RELATED RESOURCE

[Data Classification & Handling Standard](#)

- any other sensitive information

If you have a legitimate business need to disclose confidential information, you must first get approval from your manager and ensure that appropriate non-disclosure provisions are included in a contract or separate non-disclosure agreement (NDA) signed by the party receiving the information. Do not disclose any more confidential information than is necessary for your business purpose.

Another Party's Confidential Information: Similarly, you must never disclose another party's confidential information to Adobe unless you are authorized by that party to provide that information. This includes confidential information you may have received while employed by a prior employer; your obligations to continue to protect such information likely continue after your employment terminated.

Any questions about whether something is considered confidential information should be directed to Adobe's Compliance Office at Integrity@adobe.com.

4. Our Individual Conduct

We are each responsible for acting in an ethical way and complying with applicable laws.

4.1. Avoiding Conflicts of Interest

Adobe takes an active role in managing conflicts of interest, as described in the [Conflicts of Interest Policy](#). A conflict of interest can arise from any personal activities or relationships that influence, or appear to influence, your ability to act in the best interests of Adobe.

You are encouraged to be transparent so that potential conflicts can be identified early and appropriate precautions can be taken to protect both you and Adobe. If you have a circumstance that potentially conflicts with Adobe's interests, you must disclose it to the Adobe Compliance Office and follow any controls deemed necessary for Adobe to ensure that individuals who make decisions or are otherwise involved can exercise independent business judgment in Adobe's best interest. Any activity that competes with Adobe or opposes Adobe's interests will not be permitted.

The following scenarios are among those that give rise to potential conflicts of interest:

Having an outside position, such as serving on a board, for any entity (for-profit or non-profit), especially if that entity has a current or potential business relationship or competitive relationship with Adobe. You may be required to follow specific controls to ensure that you do not participate in or have influence over any business relationship between the entity and Adobe. You may not serve in any position for an entity that competes or is likely to compete with Adobe's current or future business, and you must receive prior approvals to serve on any for-profit board.

Performing outside work, whether paid or unpaid, that is related to Adobe's business or the work you perform for Adobe. Outside work may include consulting, speaking engagements, authoring publications, and developing software or apps for non-personal use. Outside work will only be permitted if it is limited in scope, does not interfere with your work at Adobe, and does not use Adobe's resources. Performing work for an Adobe competitor is not allowed under any circumstances.

Holding a Significant Investment in an entity that currently conducts or seeks to conduct business with Adobe. A Significant Investment is any beneficial ownership or financial interest that could influence, or reasonably appear to influence, your judgment or ability to act on behalf of Adobe, as defined in the [Conflict of Interest Policy](#). In general, Significant Investments will only be permitted if you do not have responsibility for any business relationship between the entity and Adobe. You may not own, either directly or indirectly, a Significant Investment in any entity that competes or is likely to compete with Adobe (with the exception of owning stock in publicly traded companies).

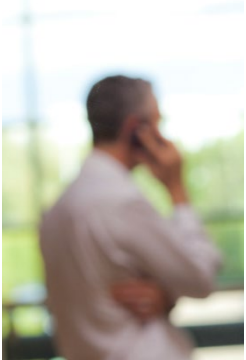
Conducting Adobe business with related parties, such as a family member, person sharing your household, or anyone else with whom you have a significant personal relationship. You are responsible for avoiding situations where your personal relationships may create the appearance of a conflict of interest. For example, you may be required to follow specific controls to avoid participating in or having influence over any business relationship between your related party (or their employer) and Adobe. Similarly, significant personal relationships with others within Adobe, particularly when within a reporting structure, may create a potential conflict or the appearance of a conflict and need to be disclosed for evaluation and appropriate management.

Giving or receiving gifts or hospitality from any outside entity that conducts business or seeks to conduct business with Adobe. Adobe recognizes that business gifts and hospitality can establish goodwill, but they can also create conflicts of interest, violate procurement laws, or constitute illegal bribery if they are excessive, frequent, or appear to be used for improper influence. Gifts and hospitality may only be exchanged in accordance with Adobe policies (see [Business Gifts and Hospitality Policy](#)) and the policies of the outside entity. All Adobe personnel must

RELATED RESOURCES

[Conflict of Interest Policy](#)

[Business Gifts & Hospitality Policy](#)



obtain pre-approval from the Compliance Office before providing or accepting anything of value (e.g., gifts, entertainment, travel, hospitality, awards, or certificates) to or from a government, government entity, or a government employee, representative, or agent. See the [Gifts & Hospitality page](#) on Inside Adobe for instructions and the link to request pre-approval. Also, see the [Government Gifts & Hospitality Matrix](#) for further guidance.

Special rules apply to government employees and to third parties participating in or potentially participating in U.S. Federal government contracts with Adobe such as prime contractors, resellers, and distributors. For more information, see the [U.S. Public Sector Handbook](#).

Taking personal advantage of corporate opportunities that are presented to you or discovered by you through your position with Adobe or through your use of Adobe property or information. You may only pursue such opportunities if you have received authorization from the Adobe Compliance Office, General Counsel, or if appropriate, the Adobe Board of Directors or a committee of the Board.

4.2. Prohibition on Insider Trading

As you perform your job for Adobe, you may possess Insider Information that gives you an unfair advantage in trading Adobe stocks or the stocks of other companies such as Adobe's existing or potential customers, suppliers or business partners, or an economically-linked company such as a competitor of Adobe.

"Insider Information" refers to any **non-public** information that a reasonable investor would consider important in deciding whether to buy, sell, or hold stock. U.S. law prohibits trading in securities of a company by any person in possession of Insider Information of that company or sharing Insider Information with others who may trade on the basis of that information ("tipping"). Adobe's policy also prohibits transactions such as trading in Adobe options and other derivative securities at any time. See the [Insider Trading Policy](#) for more information, including a complete list of prohibited transactions.

If you trade on the basis of Insider Information, or tip Insider Information to others, you may be personally liable for civil and criminal fines and face the possibility of a jail sentence. To help protect you from violating insider trading laws, Adobe has established quarterly trading window procedures that establish when you can and cannot trade Adobe stock. However, it is ultimately your responsibility to avoid trading any stock on the basis of Insider Information at any time, regardless of whether the trading window is open.

If you have questions about whether a transaction is legal or may violate insider trading laws, promptly consult the [Stock Trading Compliance Center](#) on Inside Adobe or send your question to Trading@adobe.com.

4.3. Social Media and Public Speaking

Adobe supports the appropriate use of social media both personally and, if authorized, on behalf of the company. If you engage in social media, you are expected to always demonstrate good judgment and adhere to Adobe's key social principles of being authentic, involved, responsible, and respectful. Remember that you are responsible for what you say or post online.

All social media and social networking accounts created by Adobe employees that leverage Adobe's brands or trademarks, or that are created using an Adobe business email address, are considered the property of Adobe. You must be authorized by Adobe's Social Media Center of Excellence before you create or manage these Adobe-owned properties. Visit the [Social Media Resources](#) page on Inside Adobe for guidelines and training resources.

Whether through social media or other forms of public speaking, you may not represent that you are speaking on behalf of Adobe unless you are authorized to do so by Adobe Public Relations. At all times, you must protect against any unauthorized disclosure of confidential information belonging to Adobe, our customers, or any third parties with whom we do business. See the [Public Communication Policy](#) for more information.

5. Our Business Relationships

5.1. Fair Dealing

Adobe adheres to these basic principles of fair business dealing:

- We communicate honestly to our customers, business partners, stockholders, and community members.
- We do not misuse the intellectual property or confidential information of Adobe or anyone else.
- We respect others and do not take advantage of anyone through manipulation, concealment, abuse of confidential or privileged information, or misrepresentation of material facts.
- We require all sales and other commercial transactions to be supported with documents that accurately represent the transaction. We do not omit or misrepresent any material facts in our records.
- We act with integrity, and we comply with all applicable laws and regulations.

RELATED RESOURCES

[Insider Trading Policy](#)

[Trading Window Calendar](#)

- We provide accurate reports and statements to our employees, customers, business partners, stockholders, and creditors, as well as government agencies and officials.
- We ensure that, when Adobe purchases services or goods, our selection process is fair.
- We guard against conflicts of interest held by anyone responsible for making or influencing purchasing decisions.

INTERACTIONS WITH COMPETITORS

You are expected to conduct all interactions with competitors, including social activities, as if they were completely in the public view. Remember that your interactions may later be subject to examination and interpretation.

RELATED RESOURCES

[Business Travel and Expense Reimbursement Policy](#)

[Contract Signature Policy](#)

[Side Arrangements Policy](#)

[Supplemental Resource](#)

Visit the [Corporate Policies page](#) on Inside Adobe for policies in various areas:

[Accounting & Finance](#)

[Legal & Government](#)

[Relations](#)

[Purchasing & Receiving](#)

[Treasury & Credit](#)

5.2. Open and Fair Competition

Adobe complies with all competition and antitrust laws that protect and support free enterprise. We believe that open competition leads to a vibrant marketplace where consumers benefit from lower prices, more choices, and better products and services. Violation of the competition and antitrust laws may expose Adobe and you personally to criminal and civil penalties. We do not participate in activities that have the effect or intent of reducing or destroying competition, such as agreeing with competitors to charge certain prices to customers (price fixing), coordinating with competitors during competitive bidding processes (bid rigging), or dividing up markets by region, product, or customer (market allocation).

We compete fairly and on merits, and we avoid business practices that unfairly exclude or foreclose competitors from the marketplace. We do not enter into illegal agreements with our competitors, whether formal or informal, written, or oral. Before we agree to a partnership or joint venture with other third parties, we are cautious to consider whether the partnership or joint venture may have unlawful anticompetitive effects.

Although we compete vigorously, we play by the rules:

- We gather competitive intelligence lawfully and without the use of deception.
- We do not seek to acquire, use, or disclose a competitor's trade secrets or confidential information. If you receive confidential information about a competitor, even if accidentally or from an unknown source, or if you become aware or suspect that someone at Adobe has received confidential information about a competitor, you must immediately contact your manager and either the Adobe Compliance Office or Adobe Legal department to determine how to proceed.
- We communicate honestly, and we do not make false claims or comparisons about our competitors or their products or services.
- We conduct all interactions with competitors, including social activities, as if they were completely in the public view. Remember that your interactions may later be subject to examination and unfavorable interpretation.

5.3. Data Protection and Privacy

Adobe is a steward of our employees', vendors', customers', and other individuals' personal information. We take our responsibility seriously. We handle personal information in accordance with our internal and external privacy policies, and we comply with applicable global data protection laws to protect personal information entrusted to us as part of our business operations.

5.4. Working with Government Customers

Adobe is subject to unique requirements that are considerably stricter when a government entity is our customer or ultimate end customer (such as when Adobe performs as a subcontractor). A violation of these requirements can lead to serious financial and reputational harm and result in Adobe being prohibited from doing business with the government.

If your work involves a government entity, you are responsible for knowing the specific requirements that apply. Always ask your manager or contact the Adobe Compliance Office if you are unclear about what is required.

As a supplement to this Code, Adobe maintains a separate [U.S. Public Sector Handbook](#) to address specific requirements that apply when Adobe conducts business with the U.S. public sector. The U.S. public sector includes all federal, state, and local government entities, entities controlled or partially controlled by the U.S. government, and any prime contractors for government entities.

5.5. Maintaining Accurate Books and Records

Adobe is required by law to keep books and records that accurately reflect the true nature of our operations and finances. We ensure that all documentation is complete and correct.

RELATED RESOURCES

[Personal Information Protection Policy](#)

[Adobe Customer Privacy Center](#)

[Electronic Communications and Technology Usage Policy](#)

[Global Adobe Worker Privacy Policy](#)

RELATED RESOURCES

- [Trade Compliance Policy](#)
- [Trade Compliance Portal](#)
- [US Sanctions Screening Tool](#)

It is a violation of this Code and our company policies to intentionally omit, hide, or disguise the nature of any transaction or liability in Adobe's books and records. Falsification of business documents, whether or not it results in personal or commercial gain, is never permitted and may result in termination of your employment or business relationship with Adobe. Cash or other assets may never be maintained for any purpose in any unrecorded or "off-the-books" accounts.

You are never permitted to misclassify the account or accounting period of any transaction, or to misrepresent the nature of a transaction. The foregoing includes, but is not limited to, information included in our financial statements, earnings, press releases, and any other financial information shared publicly as well as internal records.

You must never take any direct or indirect action which improperly impacts the timing of closing a transaction or otherwise circumvents Adobe's regular business practices. You must not misrepresent the status or timing of a transaction to anyone at Adobe, a customer, vendor, or other business partner. You must obtain appropriate authorization for all Adobe business transactions and provide all necessary supporting documentation in a thorough and timely manner. All transaction documents must be properly recorded and reflected in Adobe's books and records. See the [Supplemental Resource](#) for additional guidance.

5.6. Document Retention

Adobe may regularly destroy documents that are not required to be retained. However, if there is an actual or potential litigation or investigation, Adobe may determine that it is necessary to preserve information regarding the matter, such as emails and other documents that might otherwise be deleted.

If you become aware of any internal or external complaint, demand letter, lawsuit, or other legal proceeding involving Adobe, you must notify the Adobe Legal department immediately. You are expected to comply with any document retention or preservation instructions that you receive from the Adobe Legal department.

5.7. Financial Reporting

Adobe is required by law to make filings with the U.S. Securities and Exchange Commission (the "SEC"), and with other governmental bodies around the world, that provide full, accurate, and understandable disclosure of our financial condition and results of our business operations. Adobe relies on its financial records and other business records in preparing these reports. We follow U.S. generally accepted accounting principles to produce our financial records.

Adobe's financial disclosures must be accurate and transparent and reflect the high quality and integrity of our accounting practices and records. Anyone who contributes to preparing or verifying these SEC reports is responsible for ensuring that the reports contain all relevant and important information to enable stockholders and potential investors to assess the soundness and risks of our business and finances.

Your full cooperation with any investigation or review is expected to help ensure that Adobe's books and records, as well as our financial reports filed with the SEC (or filed with other governmental bodies, such as with respect to Adobe's subsidiaries worldwide), are accurate and complete.

You must never:

- Take any action that would cause our financial records or financial disclosures to fail to comply with U.S. generally accepted accounting principles, the rules and regulations of the SEC, or any other applicable laws.
- Knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of Adobe's reports filed with the SEC or any other governmental bodies.
- Knowingly omit (or cause or encourage any other person to omit) any information that is necessary to make Adobe's financial reports accurate in all material respects.
- Coerce, manipulate, mislead, or fraudulently influence (or cause or encourage any other person to coerce, manipulate, mislead, or fraudulently influence) Adobe's independent public accountants.

To highlight how important these standards are to Adobe, our Senior Officers are also bound by a separate Code of Ethics in addition to this Code. These employees of Adobe have a special role that requires both adhering to this Code and ensuring that Adobe has a culture of integrity that promotes fair, accurate, and timely reporting of our financial results and condition.

6. Our Community

6.1. Global Trade Regulations

As a U.S. company, all Adobe subsidiaries and employees worldwide are subject to U.S. and other applicable trade regulations that prohibit the provision of our products and services to certain embargoed countries and regions, to

RELATED RESOURCES

[Personal Information Retention and Deletion Policy](#)

[Consumer Personal Information Retention and Deletion Standard](#)

[Employee and Applicant Personal Information Retention and Deletion Standard](#)

REPORTING A CONCERN

If you become aware of any departure from these financial reporting standards, you have a responsibility to report your knowledge promptly to the Compliance Office, the General Counsel, or the Audit Committee of the Adobe Board of Directors if appropriate.

RELATED RESOURCE

[Code of Ethics](#)

sanctioned entities and individuals, and for certain end uses (including but not limited to weapons of mass destruction, proliferation, and military end uses). These controls apply to all Adobe business dealings, including the provision of goods and services and electronic transfers of software or information, as well as other activities like hiring people, financial transactions, and even who is allowed to visit Adobe offices.

Adobe also complies with applicable anti-boycott rules, such as those administered by the U.S. Department of Commerce, which prohibit U.S. companies and their subsidiaries from cooperating with international boycotts not sanctioned by the U.S. Government. Adobe expects you to be aware of the basic trade control concepts that affect your role and job duties. Please visit the [Adobe Trade Compliance Portal](#) to learn more about Adobe's trade compliance obligations and how they may affect your role. If you know or suspect any activity that may raise a concern, you should promptly notify your manager and contact the International Trade Compliance Team at export@adobe.com for additional guidance.

6.2. Anti-Corruption Compliance

Adobe believes in conducting business with the highest level of integrity. Under no circumstances do we allow our personnel or any third parties acting on our behalf to give or receive bribes or kickbacks in order to influence a business outcome or obtain favorable treatment. We also keep accurate and complete records of our transactions. We do not allow anyone to falsify or conceal the improper use of our funds.

We comply with all anti-corruption and anti-bribery laws that apply to our business. In particular, Adobe is subject to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other similar international and local laws and regulations. Before you give or even offer or authorize or receive anything of value to or from a government official, or to or from any other person, you are responsible for understanding Adobe's policies and obtaining all necessary pre-approvals.

Adobe is responsible for any third parties (sales partners, vendors, or suppliers) acting on our behalf while doing business, so we must ensure these third parties comply with Adobe's policies and processes and are properly vetted and re-assessed throughout the business relationship. Adobe's [Business Partner Code of Conduct](#) articulates our commitment to integrity and our expectations of our business partners. Check our Integrity page at Inside Adobe for more guidance: <https://inside.corp.adobe.com/integrity/third-party-compliance.html>.

6.3. Charitable Donations

We take pride in contributing time and talent to invest in our communities. Adobe also makes charitable donations through its Corporate Social Responsibility programs that are properly vetted and approved by our Compliance Office, in accordance with the [Business Gifts and Hospitality Policy](#) and aligned with our enterprise-wide priorities and core beliefs. As part of our contributions, we donate our products to schools and non-profit organizations to support them with the digital tools they need to drive greater impact and streamline their operations.

Adobe encourages you to personally support charitable causes of your choice, as long as your support does not interfere with your work, give rise to a potential conflict of interest, or use Adobe equipment, funds, or other company assets. Adobe supports your personal philanthropy by matching your monetary contributions and volunteer service time to eligible organizations via our [Create Change](#) program.

6.4. Public Policy Engagement and Political Contributions

Public policy engagement is an important and appropriate role for companies and employees when conducted in a legal and transparent manner. Adobe participates in public policy development and the political process in compliance with all applicable laws and reporting requirements, and we encourage our employees to do the same.

Political involvement is governed by specific laws and is often a highly regulated area. If you are considering becoming politically involved, you are encouraged to contact the Public Policy and Government Relations team for guidance prior to getting involved. Adobe's policies and procedures for political activities are set forth in the [Public Policy and Government Relations Policy](#).

6.5. AI Ethics

At Adobe, we have a decade-long history of Artificial Intelligence (AI) Innovation. We believe that AI done right will amplify human creativity and intelligence to new levels, which is why we are committed to advancing AI in an ethical, responsible, and inclusive way that makes the tech and its impact better for both our customers and our communities.

We have built a comprehensive AI Ethics program to ensure we're developing AI technologies in a way that respects our customers and aligns with our values. Our approach to AI development starts with our AI Ethics principles – Accountability, Responsibility, and Transparency.

Guided by our AI Ethics Principles, we have created standardized processes from design to development to deployment, including training, testing and a review process overseen by a diverse AI Ethics Review Board, to manage

RELATED RESOURCE

[Global Anti-Corruption Policy](#)

risk without slowing down the pace of innovation. Check our Ethical Innovation page at Inside Adobe for more information: <https://inside.corp.adobe.com/integrity/ethical-innovation.html>.

6.6. Sustainability

We practice sustainability through our products, operations, and partnerships. Our products enable our customers to advance their sustainability goals through more efficient creative, business, and marketing processes. We are scaling our sustainability efforts and impact by focusing on the way we design and deliver our products. We are committed to driving sustainable practices across all parts of our operation and have established a renewable electricity goal and science-based targets. We engage with stakeholders and report our progress in our annual [Corporate Social Responsibility reports](#).

RELATED RESOURCES

[Sustainability Statement](#)

[Corporate Responsibility page on Adobe.com](#)

7. Compliance with the Law

Adobe firmly believes in fostering global citizenship and complying with all applicable laws in countries where we operate. To guide your actions, Adobe maintains company policies that establish operating requirements on important topics. These policies are available on Adobe's [Corporate Policies page](#) on Inside Adobe.

This Code is based primarily on U.S. laws. However, if applicable local laws are more restrictive than this Code, you must comply with those local laws. Otherwise, you are expected to comply with this Code always, even if your conduct would be permitted under local laws. If you work outside the U.S., it is your responsibility to understand and comply with local laws and policies in the area where you conduct business.

If you are uncertain whether a particular action is permissible, you should refrain from engaging in the action and seek guidance from your manager. If you feel that you cannot talk directly with your manager or if you believe your manager may not be neutral on the matter, you should seek guidance or raise your concerns through the other channels described under the *How to Report Suspected Violations* section of this Code (Section 2.1).

8. Violations

Adobe takes allegations seriously and promptly conducts investigations into reported incidents. Anyone who is found to violate this Code or other Adobe policies may be subject to immediate disciplinary action including termination of employment or affiliation with Adobe.

9. Waivers

A waiver of this Code requires approval of the Chief Compliance Officer or General Counsel. The Adobe Board of Directors or a committee of the Board, to the extent permitted by applicable regulatory and NASDAQ rules, must also approve any waiver of this Code with respect to Adobe's executive officers (which may include, as required by applicable laws, our principal executive officer; principal financial officer; principal accounting officer or controller; or persons performing similar functions) or members of our Board of Directors. Any waiver may be disclosed to stockholders as required by applicable laws, rules, and regulations.

10. Responsibility and Related Documents

The groups indicated below are responsible for the following:

ADOBE PERSONNEL	<ul style="list-style-type: none"> • Read, understand, and follow the standards and procedures in this Code • Communicate the requirements of this Code to third parties, as necessary • Comply with any training requirements or controls established by the Adobe Compliance Office
MANAGERS	<ul style="list-style-type: none"> • Discuss and reinforce the requirements in this Code with direct reports and third parties, as necessary • Be available to discuss concerns or answer questions related to the standards and procedures in and related to this Code • Monitor compliance by your direct reports with any training requirements or controls established by the Adobe Compliance Office

<p>ADOBE COMPLIANCE OFFICE</p>	<ul style="list-style-type: none"> • Update the standards and procedures in this Code as necessary • Communicate the principles of this Code and assist Adobe personnel in complying with this Code • Investigate or oversee any reported suspected violations of this Code and take any necessary enforcement action • Administer training on this Code and determine control measures to ensure compliance with this Code
--------------------------------	---

The following documents are related to this policy:

- [Business Gifts and Hospitality Policy](#)
- [Business Partner Code of Conduct](#)
- [Business Travel and Expense Reimbursement Policy](#)
- [Code of Ethics](#)
- [Conflicts of Interest Policy](#)
- [Consumer Personal Information Retention Standard](#) – This standard establishes Adobe's retention and deletion practices for consumer personal information and relates to section 5.6 of the Code of Business Conduct.
- [Contract Signature Policy](#)
- [Data Classification and Handling Standard](#)
- [Drug-Free Workplace Policy](#)
- [Electronic Communications and Technology Usage Policy](#)
- [Employee and Applicant Personal Information Retention and Deletion Standard](#) – Describes Adobe's legal requirements for retention, storage, and deletion of all data, files, records, agreements, contracts, and correspondence relating to Adobe Workers. Referenced in section 5.6 of the Code of Business Conduct.
- [Employee Privacy Policy](#)
- [Equal Employment Opportunity Policy](#)
- [Facilities Usage Policy](#)
- [Global Adobe Worker Privacy Policy](#)
- [Global Anti-Corruption Policy](#)
- [Global Environmental Health & Safety Guidelines](#)
- [Global Harassment and Discrimination Prevention Policy](#)
- [Global Human Rights Policy](#)
- [Government Gifts and Hospitality Matrix](#)
- [Information Security Policies](#)
- [Insider Trading Policy](#) and [Stock Trading Compliance Center](#)
- [Non-Retaliation Policy](#)
- [Personal Information Retention and Deletion Policy](#)
- [Privacy Center and Customer Privacy Policy](#)
- [Public Communication Policy](#)
- [Public Policy and Government Relations Policy](#)
- [Reasonable Accommodation Policy](#)
- [Side Arrangements Policy](#)
- [Software Management Standard](#) – Covers legal use of company owned software or software deployed on company owned assets, as referenced in section 3.3 of the Code of Business Conduct.
- [Social Media Resources](#)
- [Sustainability Policy](#)
- [Tobacco-Free Workplace Policy](#)
- [Trade Compliance Policy and Portal](#)
- [U.S. Public Sector Handbook](#)
- [Violence Prevention Policy](#)

All policies are posted on Inside Adobe at <https://inside.corp.adobe.com/corporate-policies.html>.