



Code of Ethics

Policy: GEN-SOP-01-002 | Owner: Audit Committee/Office of the Corporate Secretary

1. Purpose

The purpose of this document is to set forth a code of ethics for certain senior officers of Adobe Inc. ("Adobe").

2. Scope

This policy applies to:

- ☐ All Adobe Companies
- ☐ Domestic Adobe Companies (in the U.S. and Canada)
- ☐ International Adobe Companies
- ☒ **Other: 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").**

3. Responsibility

3.1. Person Responsible

Audit Committee; Office of the Corporate Secretary.

4. Policy

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

4.1. Honest and Ethical Conduct

All Senior Officers are required to perform their duties in an honest and ethical manner. They will 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 promptly consult with the Chief 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 promptly inform the Chief Compliance Officer or the General Counsel of such conflict.

4.2. Full, Fair, Accurate, Timely, and Understandable Disclosure

Senior Officers must 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.

4.3. Compliance with Governmental Laws, Rules, and Regulations

Each Senior Officer will comply with applicable governmental laws, rules, and regulations.

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4.4. Publication of the Code of Ethics

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

4.5. Changes or Waivers in the Code of Ethics

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

5. Procedures

5.1. Internal Reporting of Violations

Senior Officers must promptly 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 Chief Compliance Officer or the General Counsel or, if such person is involved in the matter giving rise to the conflict, Adobe's Audit Committee.

Senior Officers should use common sense and good judgment and act in good faith. Senior Officers 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 will 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 will be documented, as appropriate.

No person who in good faith reports a violation or suspected violation of this Code of Ethics will 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.

5.2. Consequences for Non-Compliance with the Code of Ethics

The Audit Committee is 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.

5.3. Certification

The Senior Officers will 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.

6. Related Documents and Forms

- GEN-SOP-01-001 Code of Business Conduct
- GEN-SOP-01-004 Non-Retaliation Policy

7. Policy Approval

This statement has been reviewed and approved by Adobe's Audit Committee.