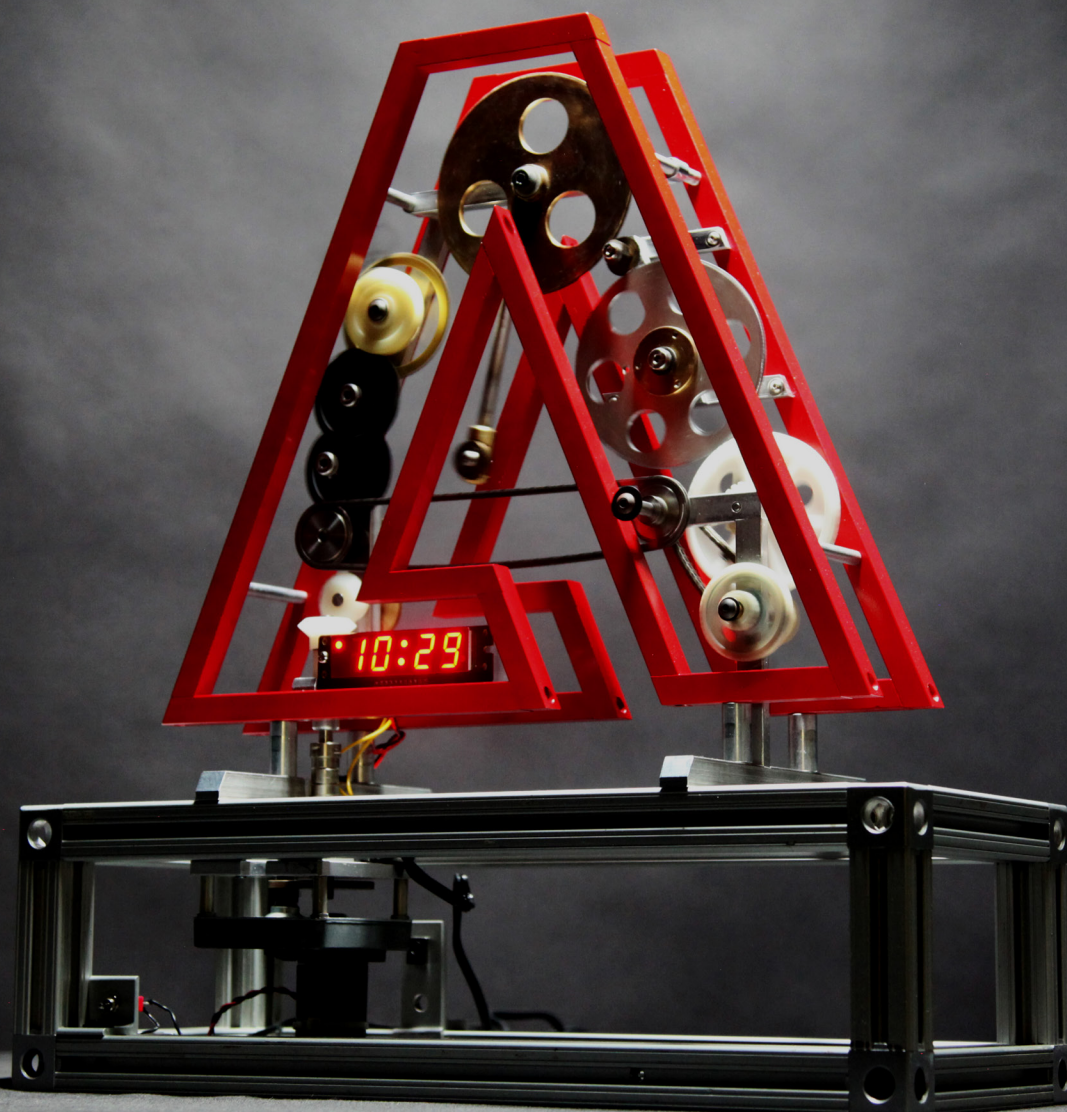




Adobe



Adobe Business Partner Code of Conduct

Adobe's identity and success is built on our foundation of integrity, honesty, and ethical conduct. Our foundation depends not only on our own employees but also upon our forming relationships with business partners who share our commitment to ethical business practices.

The Adobe Business Partner Code of Conduct articulates our own commitment and our expectations of our business partners. It also reflects our support for the Code of Conduct established by the Electronic Industry Citizenship Coalition (EICC) and the Ten Principles of the United Nations Global Compact.

We sincerely value our business partners who join us in pursuing these common goals of integrity and ethical business practices.

A handwritten signature in black ink that reads "Shantanu Narayen".

Shantanu Narayen
President and Chief Executive Officer



Integrity and Compliance with Laws

Anti-Corruption

Adobe is committed to conducting its business free from extortion, bribery and all unlawful, unethical, or fraudulent activity. Adobe business partners must not offer, give, promise or authorize any bribe, gift, loan, fee, reward or other advantage to any government official or employee, any customer, any Adobe employee or any other person to obtain any business or improperly influence any action or decision. Adobe business partners must comply with all applicable international anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act.

Conflicts of Interest

Adobe business partners must avoid any situation that may involve a conflict or the appearance of a conflict between their personal interests and the interests of Adobe. Adobe business partners must not offer or provide gifts or excessive hospitality or entertainment to any Adobe employee or client or their families to obtain or retain business or to influence a decision. Adobe employees and their family members may not hold any significant economic interest in any entity that does business with Adobe and business partners are required to avoid such relationships with Adobe employees.

Insider Trading

Adobe business partners must ensure that any non-public information obtained as a consequence of a relationship with Adobe is not used for the personal benefit of the business partner, their employees or other persons.

Intellectual Property

Adobe business partners may only use Adobe's intellectual property, such as trade secret information, copyrights, patents and trademarks, in a manner permitted under their contract with Adobe and may not misappropriate or infringe the intellectual property rights of others. Adobe business partners must not misuse any trade secrets or proprietary or confidential information of Adobe or of others for their own purposes or disclose such information to unauthorized third parties. Adobe business partners must notify Adobe if they become aware of any unauthorized use of the Adobe brands, trademarks or logos by a third party.

Confidentiality

Adobe business partners must protect Adobe's information, not disclose it to any unauthorized third party, and use it only for the business of Adobe.

Trade Controls

Adobe business partners must strictly comply with all applicable trade laws, including laws that control the import, export and re-export of Adobe products and information and laws that restrict dealings with entities and individuals located in countries subject to trade embargoes or economic sanctions.

Fair Competition

Adobe business partners must not:

- Propose or enter into any agreement with any competitor to fix prices, margins, terms and conditions or to divide up any markets or customers, or
- Propose or enter into any agreement or understanding restricting resale pricing or Adobe products.

Honest and Accurate Dealings

Adobe business partners must not make any false representations in connection with any Adobe transaction including, but not limited to, oral misrepresentations of fact or the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, forged letters of destruction or any other false or inaccurate records.

Responsible Sourcing of Minerals

Adobe business partners must reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo or an adjoining country. Adobe business partners are expected to exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to its customers and Adobe upon request.

Labor Standards

Adobe business partners are expected to treat their employees fairly in accordance with applicable laws and regulations regarding labor and employment and to pursue the following principles:

Freely Chosen Employment

Employment with Adobe business partners should be an expression of free choice and there should be no forced, bonded or involuntary labor. Adobe business partners should allow workers to discontinue employment upon reasonable notice. Adobe business partners should not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such actions are required by law.

Child Labor Avoidance

Adobe business partners should not use child labor and Adobe business partners should adopt procedures to verify and maintain documentation that no workers are younger than the local legal age for completing compulsory education. Adobe business partners must follow all applicable local laws, regulations and standards concerning working hours and conditions for all workers. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Lawful Employment

Adobe business partners must, prior to employing any worker, validate and review all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction.

Non Discrimination or Harassment

Adobe business partners must not discriminate on the basis of race, color, gender, gender identity or expression, sexual orientation, age, religion, disability, marital status, veteran status, national origin, citizenship, or cultural, religious or personal beliefs.

Freedom of Association

Adobe business partners must respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions. Adobe business partners have the right to establish favorable employment conditions and to maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

Safe Conditions

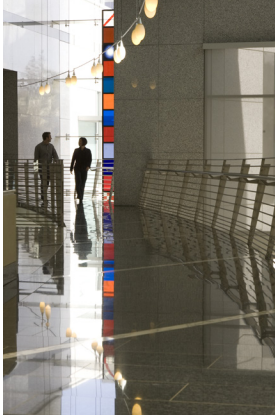
Adobe business partners must provide a safe and hygienic working environment for workers and provide appropriate safety equipment and training.

Working Hours

Adobe business partners must afford workers working hours that comply with applicable laws.

Wage and Benefits

Adobe business partners must provide wages, benefits and overtime pay that comply with all local wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.



Environmental Standards

Adobe business partners must comply with all applicable laws and regulations relating to the impact of their business on the environment. Compliance with environmental law includes any international or applicable local laws affecting the source of materials and processes used to manufacture products.

Waste Management

Adobe business partners should take steps to ensure that waste is minimized and items recycled whenever practicable.

Packaging and Paper

Adobe business partners should avoid undue and unnecessary use of materials and utilize recycled materials whenever appropriate.

Conservation

Processes and activities should be monitored and modified as necessary to ensure conservation of scarce resources, including water, flora and fauna and productive land in certain situations.

Energy Use

Adobe business partners should adapt production and delivery processes as well as heating, ventilation, lighting, IT systems and transportation to maximize efficient energy use and to minimize harmful emissions.

Procedures

Applicability

The Adobe Business Partner Code of Conduct applies to all Adobe business partners including but not limited to our distributors, resellers, solution and consulting partners, suppliers, vendors, and service providers.

Certification

Where required, each business partner covered by the Adobe Business Partner Code of Conduct shall have an authorized representative certify that he or she has read and understood the Code and commits the Adobe business partner to these standards.

Monitoring and Compliance

Adobe may audit compliance with this policy or appoint a third party to conduct an audit. Any violations will be reported to the Adobe business partner's management for their attention and, if appropriate, corrective action. It is the intention of Adobe to terminate its relationship with any business partner who does not comply with this Code of Conduct or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

Adobe business partners and other stakeholders may report suspected violations (anonymously and confidentially) to the Adobe Business Ethics Hotline at +1 800 300 1026, or by sending an email to Integrity@adobe.com.



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