

# Public Policy and Government Relations

The purpose of this policy is to ensure compliance with electoral and political involvement laws and coordinate Adobe's public policy interests and engagement with government officials.

## Scope

This policy applies to all Adobe personnel including any regular employee, Adobe-paid temporary employee, contingent worker (including agency temporary employees, independent contractors, and vendor employees), or intern of any Adobe group company.

## Policy

### Public Policy Formation and Government Relations Activities

- The Vice President Government Relations and Public Policy, managed by the General Counsel, has primary responsibility for developing Adobe's public policy positions and for advocating those positions with international, central, federal and state governments.
- The Vice President Corporate Responsibility, managed by the Chief Marketing Officer, and Adobe's Vice President Government Relations and Public Policy, managed by the General Counsel, will hold joint responsibility for developing Adobe's public policy positions and advocating those positions with local governments (city, county, town officials).
- The process of developing Adobe's public policy position may involve consulting with Adobe subject matter experts in their areas of expertise.

## Corporate Conduct

- **Corporate Expenditures.**
  - The General Counsel must approve the use of Adobe funds for all electoral or political activities for international, central, federal and state governments.
  - The Chief Marketing Officer must approve the use of Adobe funds for all electoral or political activities for local governments.
  - All corporate expenditures for electoral or political activity must comply with the law.
  - Adobe will not make any "soft" money contributions to any organizations organized under Section 527 of the United States Internal Revenue Code.
- **Use of Corporate Resources or Facilities for Electoral or Political Activity**
  - The General Counsel must pre-approve the use of any Adobe resources or facilities for electoral or political activities.
  - Employees who wish to use Adobe resources or facilities for electoral or political activities must submit a request for pre-approval to the Vice President Government Relations and Public Policy. The final decision will be made by the General Counsel in consultation with the Vice President Government Relations and Public Policy and appropriate stakeholders.
  - Any use of Adobe resources or facilities for electoral or political activities must comply with all applicable laws.

## **Employee Conduct**

- **Outside Political Activity**
  - Employees are free to participate in electoral and political activities during their personal time, as long as the activity is not on Adobe premises and does not utilize Adobe resources.
- **Expression of Political Views**
  - Employees must not represent or imply that their personal political or policy views are those of Adobe.
  - Unless authorized by Adobe, employees must not use the Adobe name or brand in a way that implies an Adobe endorsement of any candidate, ballot measure, or policy position.
  - Employees may, however, echo positions that Adobe is currently taking publicly on policy positions (such as reposting an Adobe position expressed in social media or news media).
- **No Adobe Reimbursement for Employee Political Activity**
  - Electoral and political contributions made by employees will not be reimbursed by Adobe.
  - Electoral and political contributions are not eligible as contributions under Adobe's Matching Gifts Program or any other corporate matching or reimbursement program.
  - This policy does not affect the right of employees to make any personal political contributions to parties, committees, or candidates of their choice as long as such donations are derived exclusively from non-Adobe funds.
  - No pressure or intimidation will be directed toward employees to make a personal political contribution or to support or oppose ballot measures, political parties, or candidates for public office.
- **Political Fundraising in the Workplace**
  - Employees are not permitted to engage in political fundraising on Adobe work time, on company premises, or with company resources.
- **Advocacy and Lobbying Activities**
  - Employees who have been authorized to advocate or lobby on behalf of Adobe must notify the Vice President Government Relations and Public Policy of activities, including involvement in any trade association groups which advocate for public policies.
  - Employees who desire to hire or retain advocacy or lobbying resources, must receive prior written approval from the Vice President Government Relations and Public Policy.
- **Requests for Corporate Political Contributions.**
  - All requests for corporate contributions in support of electoral or political activity must be forwarded to the Vice President Government Relations and Public Policy for appropriate handling.
- **Gifts to, and Entertainment of, Government Officials**
  - All Adobe employees must comply with the laws, regulations and company policies regarding gifts to, and entertainment of, government officials. For more information, see Adobe's Business Gifts and Hospitality Policy and Global Anti-Corruption Policy.
- **Trade Associations and Advocacy Groups**
  - At the discretion of an Adobe employee's manager, employees may participate in trade associations or advocacy groups that are involved with developing and advocating public policies.
  - Any employees who participate in these types of trade associations or advocacy groups must report their activity to the Vice President Government Relations and Public Policy, who will evaluate and determine whether such activity needs to be reported in Adobe's public disclosures.
- **Testimony, Letters, Meetings, and Public Statements**
  - The Vice President Government Relations and Public Policy must approve any publicly expressed (oral, written, etc.) Adobe positions on international, central, federal, and state public policy or electoral activity.
  - The Vice President Corporate Communications must approve any publicly expressed (oral, written, etc.) Adobe positions on local (city, county, town) public policy or electoral activity.

## Violations

Non-compliance with this policy may result in substantial legal liability and public embarrassment for Adobe. As a consequence, Adobe may take disciplinary action against anyone who violates this policy, up to and including termination of employment, contract, or affiliation with Adobe.

## Definitions

For purposes of this policy, the following terms have the meanings indicated below:

- **Electoral Contributions or Activities** – Any resources (money, time, etc.) given to an individual or group to help them in an election or ballot measure.
- **Political Contributions or Activities** – Any resources (money, time, etc.) given to an individual or group whose purpose is to give advantage to candidates involved in elections or ballot measure.
- **Public Policy** – Issues which form the basis for legislation, laws or regulations made by governments.
- **Advocacy or Lobbying Activities** – Interacting with government officials for the purpose of influencing government decisions. This does not include government interactions.

## Responsibilities and Related Documents

The groups indicated below are responsible for the following:

BOARD OF DIRECTORS (OR DESIGNATED BOARD COMMITTEE)	<ul style="list-style-type: none"> <li>• The Board of Directors, or a designated committee of the Board, must review this policy and all corporate political contributions on an annual basis.</li> </ul>
EMPLOYEES	<ul style="list-style-type: none"> <li>• Read, understand and comply with the requirements outlined in this policy.</li> <li>• Monitor compliance by any direct reports.</li> </ul>
GENERAL COUNSEL	<ul style="list-style-type: none"> <li>• Oversee the development of corporate public policy objectives.</li> <li>• Ensure legal compliance of political activity and public policy advocacy.</li> <li>• Approve the use of corporate resources or facilities for electoral or political activity.</li> </ul>
TAX DEPARTMENT	<ul style="list-style-type: none"> <li>• Ensure that Adobe complies with tax regulations and rules regarding the nondeductibility of expenses for advocacy, electoral and political activities.</li> </ul>
VICE PRESIDENT CORPORATE RESPONSIBILITY	<ul style="list-style-type: none"> <li>• Work jointly with the Vice President Government Relations to develop local government relations programs.</li> <li>• Approve publicly expressed (oral, written, etc.) Adobe positions on local (city, county, town) public policy or electoral activity.</li> </ul>
VICE PRESIDENT GOVERNMENT RELATIONS AND PUBLIC POLICY	<ul style="list-style-type: none"> <li>• Implement and maintain this policy.</li> <li>• Ensure that Adobe meets all legal requirements for making and reporting corporate political contributions and public policy advocacy.</li> <li>• Ensure this policy is posted on Adobe's public website.</li> <li>• Ensure a list of all corporate political contributions is posted on Adobe's public website on an annual basis.</li> <li>• Ensure a list of any trade associations to which Adobe pays membership dues in excess of \$50,000 annually and uses any portion of such dues for political expenditures (defined as expenditures that would not be deductible under Internal Revenue Code Section 162(e)(1)(B)) is posted on Adobe's public website on an annual basis.</li> <li>• Develop and execute international, central, federal, and state government relations programs.</li> <li>• Work jointly with the Vice President Corporate Responsibility to develop and execute local government relations programs.</li> <li>• Approve use of corporate resources and facilities for electoral or political activity.</li> <li>• Review and approve all publicly expressed (oral, written, etc.) Adobe positions on public policy or electoral activity.</li> <li>• Collect and report trade association involvement as required by law.</li> </ul>

The following documents are related to this policy:

- Business Gifts and Hospitality Policy
- Global Anti-Corruption Policy

