



## ADOBE 2021 STATEMENT FOR THE UK MODERN SLAVERY ACT

Adobe Systems Software Ireland Ltd prepared this statement in pursuant to Section 54 of the UK Modern Slavery Act 2015 for the financial year ending November 27, 2021.

Adobe Systems Software Ireland Ltd is part of the Adobe group of companies sitting under our parent entity, Adobe Inc. Adobe is a multinational computer software company, headquartered in San Jose, California, United States.

Adobe oversees a supply chain consisting of vendors, the majority of which are in the US, providing marketing services, technology products and services, non-tech professional services, human resources and facilities services. Adobe outsources manufacturing and fulfillment of limited physical production and distribution of certain Digital Media and Print and Publishing Business Unit products to a single vendor based in Singapore.

Adobe Inc. and its subsidiaries, including Adobe Systems Software Ireland Ltd, are 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 Adobe.

### Adobe Business Partner Code of Conduct

Adobe requires all suppliers and third parties to agree to our [Business Partner Code of Conduct](#) which includes abiding by our Labor 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. These are summarized below. The Business Partner Code of Conduct reflects our support for the Responsible Business Alliance Code of Conduct and the Ten Principles of the United Nations Global Compact.

Compliance with Adobe's code of conduct is specified in supplier and third party contracts.

### **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.

### **Slavery and Human Trafficking Avoidance**

Adobe regards all forms of slavery and human trafficking as unacceptable and strives to ensure that it play no part anywhere within its business. Adobe is committed to ensuring that everyone it deals with is treated with dignity and respect and that the way it conducts its business and its dealings with business partners reflects its values and deters any form of modern slavery and human trafficking from occurring within its business and supply chain.

Adobe expects each of its business partners to share its commitment to respect for human rights and equality of opportunity in the workplace. Adobe expects each such business partner to reflect this in their own employment practices so as to achieve full compliance with all applicable laws and regulations.

In order to meet these expectations, each business partner must:

- take all reasonable steps to ensure that there is no slavery, servitude, forced or compulsory labor, or human trafficking occurring in its business or in its supply chains; and
- at all times comply with the relevant provisions of all applicable laws and regulations regarding modern slavery and human trafficking in the performance of its obligations under any agreement with Adobe

### **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.

### Training

Adobe requires all employees to take a Code of Business Conduct training every two years, which includes training on Adobe's Labor Standards described above. They receive a certification of completion at the end of the training that confirms they understand the policy. Adobe also conducts regular live training to targeted audiences within its workforce.

### Site Visits

Adobe liaises regularly with its manufacturing and fulfillment supplier and conducts monthly 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 carried out by Adobe employees who have been trained in the Labor Standards and are expected to report anything which appears to contravene those standards.

Disclaimer: Due to the COVID-19 pandemic situation, site visits have been temporarily stopped. We expect to resume on-site visits in Q3, 2022.



Electronically signed  
by: Keith San Felipe  
Date: May 17, 2022  
16:13 PDT

Date: 05/17/2022

Name: Keith San Felipe  
Director