ADOBE 2018 STATEMENT FOR THE UK MODERN SLAVERY ACT

This is Adobe’s statement made pursuant to Section 54 of the UK Modern Slavery Act 2015 for the financial year ending December 1, 2018.
Adobe is a multinational computer software company, headquartered in San Jose, California, United States.
Adobe outsources manufacturing and fulfillment to a single vendor based in Singapore.

Adobe Business Partner Code of Conduct

Adobe requires all suppliers to agree to our Business Partner Code of Conduct which includes abiding by our Labor Standards – Freely Chosen Employment, Child Labor Avoidance, Lawful Employment, Non-Discrimination or Harassment, Freedom of Association, Safe Conditions, Working Hours, and Wage and Benefits. These are summarized below.

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.

**Training**
Adobe requires all internal employees to take an annual Code of Business Conduct training, 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.

**Site Visits**
Adobe liaises regularly with its 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.

*Signature*  
*Date*

Christian Keim for Adobe Systems Europe Limited  
Aug 27, 2019