



STANDARD OPERATING POLICY AND PROCEDURE

POLICY DESCRIPTION: **Harassment and Discrimination Prevention Policy**

1.0 PURPOSE

Adobe strives to create a pleasant, productive, and creative work environment for all employees. Toward that end, we are committed to providing a workplace that is free from unlawful discrimination and harassment against any person on the basis of sex, age, race, color, sexual orientation, national origin, religion, marital status, disability, veteran status or any other classification protected by applicable law.

2.0 SCOPE

This policy applies to:

- All Adobe Companies
- Domestic Adobe Companies (in the U.S. and Canada)
- International Adobe Companies
- Other (describe: _____)

3.0 RESPONSIBILITY

Employees

Employees are responsible for:

- Immediately notifying their manager if they experience harassing or discriminatory behavior and/or are aware of any such behavior by any individual.
- Where possible identifying the offensive behavior to the person engaging in the behavior and requesting that it stop.

Managers

Managers are responsible for:

- Making employees aware of this policy and for preventing unlawful harassment from occurring.
- Receiving any complaints of harassment.
- Immediately reporting any complaints of harassment to Human Resources.
- Reporting to Human Resources any incidents of unlawful harassment about which they become aware, even if no complaint is made.

Human Resources

Human Resources is responsible for:

- Promptly investigating any incidents of unlawful harassment.
- Recommending corrective action based upon the results of the investigation.

4.0 POLICY

- 4.1 Unlawful harassment of any employee (including temporary agency personnel who are not Adobe employees) will not be tolerated by Adobe.
- a) Complaints of harassment will be promptly investigated, and Adobe will take reasonable steps to maintain the confidentiality of the investigation and its findings.
 - b) At the conclusion of the investigation, Adobe will advise the complaining employee of its findings.
 - c) To the extent warranted by those findings, Adobe will take immediate and appropriate action (up to and including termination of employment) against any employee who is found to have violated this policy.
- 4.2 Employees are protected by law from retaliation for opposing or reporting any harassment or for otherwise participating in processes connected with a harassment investigation, proceeding or hearing conducted by Adobe or a government agency.
- a) No employees will be retaliated against for making a harassment complaint in good faith, or for assisting in an investigation of such a complaint.
 - b) Adobe will take disciplinary action up to and including the immediate termination of any employee who retaliates against another employee for engaging in any of these protected activities.

5.0 PROCEDURES

Employees

- 5.1 Employees are responsible for immediately notifying their manager if they experience harassing or discriminatory behavior and/or are aware of any such behavior by any individual.
- a) If they feel that they cannot talk directly to their manager, they should notify their manager's manager or any Human Resources Manager. To obtain the name of a Human Resources Manager in your area, please contact your local Human Resources Information Center (HRIC), or, if there is no local HRIC in your area, please contact the North America HRIC.
 - b) Notification may be either verbal or in writing.
- 5.2 Where possible, employees should also identify the offensive behavior to the person engaging in the behavior and request that it stop.
- a) Even if you feel you have addressed the issue with the person engaging in the behavior, you should let your manager, your manager's manager or your Human Resources manager know about the behavior in order to allow Adobe the opportunity to take action that may be appropriate to address the situation. If for any reason you feel you cannot address the issue with one of the individuals listed above, you should contact the Sr. Vice President of Human Resources.
- 5.3 To the extent that an employee is not satisfied with the handling of a harassment complaint, he or she may also contact the California Department of Fair Employment and Housing (for California employees), Federal Equal Employment Opportunity Commission, or other similar local state agencies. The telephone numbers for the state and federal agencies located nearest to you can be found in the phone book under government listings. The government agency will, in appropriate cases, prepare and investigate complaints of harassment and may award damages to employees actually injured as a result of unlawful harassment.
- 5.4 Except for these notifications, employees are responsible for keeping any allegations confidential.
- 5.5 Employees should contact their Human Resources Manager with any questions regarding this policy.

Managers

5.6 Managers are responsible for reporting to Human Resources any incidents of unlawful harassment about which they become aware, even if no complaint is made.

5.7 Managers should contact their Human Resources Manager with any questions regarding this policy.

Human Resources

5.8 Human Resources will undertake a prompt investigation of any incidents of unlawful harassment even if no complaint is made, and will, if appropriate, recommend corrective action based upon the results of the investigation.

6.0 EXCEPTIONS

- There are no exceptions to this policy.

7.0 DEFINITIONS

This policy applies to complaints and investigations of all forms of unlawful harassment or discrimination. This policy applies to all forms of conduct by, and contact between, Adobe employees including, but not limited to, on and off site meetings, and e-mail, voicemail and all other types of verbal and written communication.

Unlawful harassment includes any conduct that is based upon a person's race, sex, religion, disability or other protected status, which conduct has the purpose or effect of (i) unreasonably interfering with that person's work performance, or (ii) creating an intimidating, hostile or offensive work environment for that person.

Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct that is sexual in nature or directed at a person because of his/her gender constitutes sexual harassment if:

- the person is explicitly or implicitly pressured to submit to the unwelcome conduct as a condition of employment (e.g., "go out with me or you'll be fired...") or any employment benefit (e.g., "if you don't go out with me, you won't get that pay increase/promotion"); or
- it creates an intimidating, hostile or offensive work environment for the person

Harassment may also include:

- touching someone in a manner that is unwelcome to that person
- making sexual comments, jokes or innuendoes, vulgar or obscene remarks
- displaying or transmitting offensive pictures, calendars, bitmaps or cartoons either verbal or in writing, including by e-mail

8.0 RELATED DOCUMENTS AND FORMS

- LGL-SOP-01-006 Violence Prevention Policy
- Open Door Policy
- HTR-SOP-01-001 Equal Employment Opportunity (EEO) & Affirmative Action (AA)

9.0 DOCUMENT HISTORY

VERSION	ISSUE DATE	CHANGES
1.0	3/6/98	Policy on Harassment
2.0	10/4/99	Updated and issued on 10/4/99
3.0	5/23/03	Policy drafted using standard SOP template. Minor editing and clarification of definitions in Section 7.0.
3.1	7/14/05	Changed policy name.
4.0	06/28/11	Changed policy owner and updated policy links.

10.0 POLICY APPROVAL

This statement has been reviewed and approved in accordance with Adobe's Policy # IAU-SOP-01-001.