

**CORPORATE SOCIAL RESPONSIBILITY POLICY OF ADOBE SYSTEMS INDIA PRIVATE LIMITED**



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## 1. INTRODUCTION

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At Adobe India Systems Private Limited (hereinafter referred to as “the Company” or “Adobe India”), we are inspired by purpose-driven creativity. We believe that everyone has the power to create and that being creative is not confined to any one sector or profession. “CreateChange,” our corporate social responsibility (CSR) call-to-action, guides how we operate our business, design new products, and address pressing social and environmental issues.

Adobe India recognizes the impact it has on communities in which it operates being a responsible Corporate Citizen and believes that it has a tremendous opportunity to change lives of the communities and aims to be a trusted partner contributing to the social, economic and environmental progress of India. As part of its dedicated approach to creating economic opportunities in the communities in which it operates, the Company has been undertaking a series of initiatives that are locally relevant and has been partnering with various stakeholders including non-profitable organizations, NGOs, employees, hospitals and with the Government of India only on need basis etc.

In conformity with requirements laid down under The Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as “the CSR Rules”) issued by the Ministry of Corporate Affairs (“MCA”), under Section 135 of the Companies Act, 2013 (“the 2013 Act”) the Board of Directors adopted the first version of the CSR Policy in its Board meeting held on March 27, 2015.

The CSR Policy of the Company is amended from time to time as required either pursuant to the reforms in the 2013 Act or due to changes in internal process or requirements. The updated Policy can be downloaded from the website of Company <https://inside.corp.adobe.com/createchange.html>



## **2. OBJECTIVE & FOCUS AREAS**

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The main objectives of the Adobe CSR Policy are:

- I. Strive for economic development that positively impacts society at large
- II. Embrace responsibility for the Company's actions and encourage a positive impact through its activities to alleviate hunger, poverty, malnutrition, health, gender equality and environmental sustainability to protect the environment, and to support communities, stakeholders and society



### 3. ADOBE'S CSR BELIEF

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We believe in making the world more creative. We empower creators of all backgrounds with the skills, AI-powered tools and opportunities they need to build creative and marketing careers, share their stories and shape their communities CSR Pillars:

- I. **Build Creative and Marketing Skills for the Future**  
Enable Learners with the AI literacy and skills they need to build great creative and digital careers
- II. **Power Next Gen Storytelling**  
Empower creators from all backgrounds to share compelling stories that use AI and modern tools
- III. **Strengthen Communities**  
Engage Adobe, our people and nonprofits with tools and resources to drive community impact and climate resilience

Further, the Company focuses on the following areas as well:

Disaster management, including relief, rehabilitation and reconstruction activities. Contribution made to State Disaster Management Authorities to combat Pandemics in future.



#### 4. DEFINITIONS

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In this Policy, unless the context otherwise requires:

- I. "Act" shall mean the Companies Act 2013, including any modifications, amendments or re-enactment thereof
- II. "Adobe" shall mean Adobe Systems India Private Limited incorporated under the Companies Act, 1956
- III. "Approved Budget" shall mean the total budget as approved by the Board of the Company upon the recommendation of the CSR Committee, which is to be utilized for CSR Projects
- IV. "Board" shall mean the Board of Directors of the Company
- V. "Company/ Adobe" shall mean Adobe Systems India Private Limited and wherever the context requires, shall signify the Company acting through its Board
- VI. "CSR Committee" shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act, consisting of two Directors
- VII. "CSR expenditure" means all CSR expenditure of the Company as approved by the Board upon recommendation of the CSR committee, including the following:
  - a. contribution to CSR Projects which shall be implemented and/or executed by the company
  - b. contribution to CSR Projects (including for corpus as required) which shall be implemented and/or executed by its Trust or Society
  - c. contribution to CSR Projects (including for corpus as required) which shall be implemented and/or executed by an organization
  - d. Any other contributions covered under Schedule VII
- VIII. Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR expenditure
- IX. "CSR Policy" shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon



- X. “CSR Projects” or “Projects” means Corporate Social Responsibility projects/activities/ programs/ initiatives, instituted in India, either new or ongoing, and includes, but is not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company. Projects/activities/ programs initiatives undertaken in pursuance of normal course of business of the Company and projects which benefit only the employees of the Company and their families shall not be considered as CSR Projects
  
- XI. “Financial Year” shall mean the period beginning from 1st April of every year to 31st March of the succeeding year
  
- XII. “Net profit” means the net profit of a Company calculated in accordance with the provisions of section 198 of the Companies Act, 2013 and shall not include the following namely: -
  - a. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise and
  
  - b. Any dividend received from other companies in India which are covered under and complying with the provisions of section 135 of the Act
  
- XIII. “Organization” (or Organizations) means any Section 8 Company or a registered trust/Society /NGO/ institution, performing social services for the benefit of the society and excluding a registered trust/society/ NGO/institution/ Section 8 Company which is formed by the Company or its holding or subsidiary company/ companies
  
- XIV. “Rules” shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof



#### 4. COMPOSITION OF THE CSR COMMITTEE

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In accordance with the requirements of Section 135 of the Companies Act, 2013, the Company has established a committee to oversee its CSR activities. The CSR Committee consists of three (3) members, and the members of the committee are as follows:

- I. Mr. Abhigyan Modi
- II. Mr. Amit Dayal
- III. Mrs. Swati Rustagi

The CSR Committee has also established a CSR Sub-Committee. Additionally, the Company has formed a CSR Team that will assist and coordinate with the Committee members in the implementation and monitoring of the CSR Policy.



## 5. RESPONSIBILITIES OF THE CSR COMMITTEE

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The responsibilities of the Corporate Social Responsibility Committee with respect to CSR matters include:

- I. Formulate CSR Policy and recommend the same to the Board of Directors for approval
- II. Recommending any modifications to the CSR Policy
- III. Recommending annual CSR Budget to the Board of Directors
- IV. Review of the Annual Action plan submitted by the CSR Team and recommending the same for the approval of the Board of Directors
- V. Periodic review of CSR spending, and utilization reports issued by the implementing agencies
- VI. Submitting periodic summary to the Board of Directors



## 6. IMPLEMENTATION OF CSR

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- I. The CSR team of Adobe shall work with the respective implementing agencies/strategic partner for making the CSR contribution and shall monitor the execution of CSR projects by the implementing agencies and utilization of CSR fund
- II. The implementation of programs in India is aligned to Schedule VII of the Companies Act (2013)
- III. Proposals for new programs, as and when received, shall be evaluated in terms of appropriateness and alignment with Adobe's CSR Policy. The CSR activities and programs shall be undertaken directly or through Section 8 Company/ Registered Public Trust/ Registered Society registered under Sec 12A and 80G of the Income Tax Act established by any of the following and having CSR Registration Number allotted by the Ministry of Corporate Affairs:
  - a. Company singly or along with any other company
  - b. Central or state Govt
  - c. Any third party provided that the said entity has a track record of minimum 3 years in undertaking similar activities
  - d. Any entity established by an Act of Parliament or state legislature
- IV. The Company may also collaborate with other companies to undertake CSR activities or programs

### 6.1 EXCLUSIONS

- I. The CSR activities shall not include the activities undertaken in pursuance of its normal course of business
- II. Any contribution, direct or indirect, to any political party, shall not be considered CSR Expenditure
- III. The CSR projects or programs or activities that benefit exclusively the employees of the Company, and their families, shall not be considered as CSR activities in accordance with this Policy

All the CSR Programs and projects implemented through the external partners are approved and specified by the Company. In the past few years, the Company has been associated with various CSR partners who undertake and implement programs that have been able to create some impact on the education of the underprivileged sections of society.



## 7. CSR BUDGET

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- I. For achieving its CSR objectives through implementation of meaningful and sustainable CSR programs, the Company will allocate minimum 2% of its average net profits made during the 3 immediately preceding financial years as its Annual CSR Budget
- II. The Annual CSR Budget shall be spent on CSR activities or projects as recommended by the CSR Committee
- III. In the unlikely scenario of the Company failing to spend the target amount within the specific financial year, the CSR Committee shall submit a report in writing to the Board of Directors
- IV. Any surplus, if any, arising out of the CSR projects will not be considered as a part of the business profits of the company
- V. Subject to the provisions of the Act, CSR spend in excess of the statutory requirement may be set off against the requirement to spend towards CSR activities for the subsequent years with the approval of the Board
- VI. Any CSR unspent at the end of a financial year shall be reported by the CSR Committee to the Board of Directors specifying the reasons for not spending the amount which in turn shall be reported by the Board of Directors in their Report for that particular financial year. Transfer of the unspent CSR amount to government specified fund shall be governed by the applicable provisions of the Act

### **Process for Disbursement of Grant:**

Grant amount will be disbursed subject to written application from the selected Organization to the CSR Committee, and their written approval thereof. In case there are any additional costs then the selected Organization will write to the CSR Committee justifying the project cost in addition to approvals sought and the CSR Committee may grant approval for the same.



## 8. DISCLOSURES

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The Board's report, being a part of the Annual Report, shall disclose the composition of the Corporate Social Responsibility Committee, the contents of such policy and the CSR initiatives undertaken. This CSR Policy shall also be placed on the website of the Company.



## 9. POLICY REVIEW AND AMENDMENTS

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The Board of Directors of the Company shall have the power to revise, modify or amend this policy from time to time, as the Board may think fit, based on the recommendations made by the CSR Committee to confirm the revision or amendment, if any, to be made to the act/rule.



**10. DOCUMENT HISTORY**

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<b>Version</b>	<b>Amendments</b>	<b>Approval</b>
1.0	None	Reviewed and approved in board meeting dated March 27, 2015
1.1	Revisions to the policy have been made in accordance with the applicable provisions of the Companies Act, 2013	Reviewed and approved in board meeting dated May 25, 2022
1.2	Few amendments incorporated in the policy pursuant to broader CSR theme and Reconstitution of CSR Committee	Reviewed and approved in board meeting dated May 28, 2026