

DISCLOSURE FOR THE UK MODERN SLAVERY ACT AND CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

Pursuant to **Section 3 of the California Transparency in Supply Chains Act of 2010 and the United Kingdom (UK) Modern Slavery Act 2015, Chapter 30, Part 6, Provision 54**, Adobe states that we have taken steps during the financial year to identify the risk of slavery and human trafficking taking place in any of our supply chains and in any part of our business.

Adobe commits publicly to the EICC Code of Conduct (Code) and is expected to actively pursue conformance to the Code and its standards as a total supply chain initiative.

The Code outlines necessary management systems to ensure workers' rights are protected.

Our steps taken include,

1. Verification: We evaluate and address risks of human trafficking and slavery through conformance to the Code, Section A.1, which states, among other standards, that: Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. We pursue conformance by using the EICC's Maplecroft Risk Assessment tool, the Supplier Self-Assessment Questionnaire, and Validated Audit Process (VAP).
 - a. The Maplecroft Risk Assessment tool is a third-party service that evaluates risks with respect to the Code (including Section A.1) by inherent risk, sector and location.
 - b. The Supplier Self-Assessment Questionnaire (SAQ) is a self-evaluation that inquiries about demographics and existing policies at the facility level against all sections of the Code.
 - c. The VAP audits carried out on EICC member facilities and their suppliers' facilities are completed by independent, third-party auditors specially trained in social and environmental auditing and the VAP audit protocol. This helps to set consistent, industry-wide expectations.

We conduct these activities annually.

2. Supplier Audits: We either conduct VAP audits, or obtain audit reports through EICC's audit sharing system, for suppliers scoring "high risk" on the SAQ. These audit reports are valid for two years. The tools referenced above help us decide which suppliers to audit by helping to identify risk levels for slave labor or human trafficking practices.

The VAP assesses suppliers against the entire EICC Code, including: Labor, Health & Safety, Environment, Ethics, and Management Systems. It includes many different components, such as On-Site Inspections, Document Reviews, and Worker and Management Interviews.

3. Certification: Pursuant to Section E of the EICC Code, Adobe utilizes a management system that contains “a process to communicate the Code requirements and to monitor supplier compliance to the Code.” This does not mean that suppliers submit certifications.
4. Internal Accountability: Adobe takes noncompliance with the EICC Code on slavery and trafficking seriously. Adobe will investigate any alleged instances of nonconformance with the EICC code, and will timely initiate corrective action plans, including appropriate disciplinary action, for any identified violations of this policy.
5. Capacity-Building/Training: Adobe encourages suppliers to utilize EICC’s Learning Academy which contains online learning modules that cover the EICC Code of Conduct, as well as modules specifically related to the California Transparency in Supply Chains Act. In addition, there are modules on hiring and related topics that are particularly relevant to these issues. Modules can be assigned to both internal staff and suppliers and learning can be tracked.

The EICC Code is a fundamental part of our efforts to ensure that slavery and human trafficking are not taking place in our supply chains and our own business.

This disclosure includes the efforts Adobe has taken in our own business, as well as our suppliers, to oppose the use of slavery and human trafficking in our supply chain.

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