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ADOBE PUBLIC POLICY AND GOVERNMENT RELATIONS POLICY

Purpose

The purpose of this policy is to ensure: compliance with all applicable laws and regulations regarding political and lobbying activity; and coordinated and effective public policy advocacy that serves Adobe's business interests.

Scope

This policy applies to all Adobe employees.

Policy

Public Policy Formulation

Statement of Principle

- Adobe may take positions on public policies when doing so advances the company's business interests and is consistent with Adobe's values and Code of Business Conduct
- Adobe's corporate public policy positions will be articulated in various ways, as circumstances warrant and in conformity with all applicable laws

Government Relations Responsibilities

- Guided by the Senior Vice President and General Counsel, the senior management sets Adobe's overall public policy objectives
- The Director, Corporate Social Responsibility manages worldwide local government relations
- The Public Policy Group (PPG) within the Legal Department, headed by the Senior Director for Public Policy, has responsibility for the development and execution of all non-local government relations programs

Interdepartmental Cooperation

- As needed, the PPG will consult with other Adobe personnel and departments on the formulation and implementation of company positions on state, national, and international public policies
- The PPG will also coordinate with and support Adobe's other public affairs activities and pursue synergies wherever possible

Corporate Conduct

Corporate Expenditures

- Laws and regulations in many jurisdictions restrict whether and how corporate funds and other corporate resources may be used for activity undertaken in support of or in opposition to a candidate for public office, a political party, or ballot measure (collectively, "electoral activity"), or in connection with public policy matters. "Public policy matters," for the purposes of this document, refers to the formulation of government legislation and/or regulation, including engagement with government officials, legislators, trade associations, and other bodies as part of the public policy process. "Public policy matters" do not include contacts related to sales, product development, standards, or regulatory compliance
- Prospective corporate expenditures will be evaluated on a case-by-case basis consistent with this policy and applicable law
- The Senior Director of Public Policy and Senior Vice President and General Counsel must approve the use of corporate funds for all electoral activity and any state, national, or international public policy matters
- The Director, Corporate Social Responsibility, must approve the use of corporate funds for any local public policy matters
- Adobe will not make any "soft" money contributions to any organizations organized under Section 527 of the Internal Revenue Code

Use of Corporate Facilities for Electoral Activity

- The use of Adobe resources and facilities must comply with all applicable election laws. Therefore, employees may not use any Adobe resources, including the time of other Adobe employees, meeting rooms, parking facilities, e-mail, Adobe-provided web space, telephones, copiers, printers, or fax machines, for electoral activity unless such use is permitted by law and is authorized by the Senior Vice President and General Counsel or Senior Director for Public Policy

Employee Conduct***Outside Political Activity***

- Adobe respects the right of its employees to participate in the political process
- Therefore, employees are free to engage in electoral activity during their personal time, as long as this activity is not on Adobe premises and does not utilize any Adobe resources

Employee Views on Politics and Public Policy are Their Own

- Employees may not represent or imply that their personal political or policy views are those of Adobe, unless authorized in advance by the Senior Vice President and General Counsel or Senior Director for Public Policy
- Employees should not use the Adobe name in a way that might imply an Adobe endorsement of any candidate, ballot measure, or policy position, unless authorized in advance by the Senior Vice President and General Counsel or Senior Director for Public Policy

No Adobe Reimbursement for Employee Political Activity

- Contributions made by employees to influence the nomination or election of any candidate or the qualification or passage of any ballot measure will not be reimbursed by Adobe, nor are political contributions eligible contributions under Adobe's Matching Gift Program
- This policy shall not affect the right of employees of Adobe to make personal political contributions to the party, committee, or candidate of their choice as long as such donations are derived exclusively from non-Adobe funds
- No pressure in any form may be directed toward any employees to make any personal political contribution or to support or oppose any ballot measure, political party, or the candidacy of any individual

Political Fundraising in the Workplace

- Adobe employees are not permitted to engage in political fundraising on Adobe work time, on company premises, or with company resources

Requests for Corporate Political Contributions

- All requests for corporate contributions in support of any electoral activity must be forwarded to the Senior Director for Public Policy for appropriate handling

Gifts to, and Entertainment of, Government Officials

- All Adobe employees must comply with all laws, regulations, and company policies regarding gifts to, and entertainment of, government officials

Procedures

Legal Compliance

Political Fundraising

- As stated in above, requests for Adobe to make electoral campaign contributions should be forwarded to the Senior Director for Public Policy to ensure that handling of fundraising solicitations complies with all applicable laws and Adobe policy
- The Senior Director for Public Policy will be responsible for, inter alia, ensuring that Adobe meets the relevant requirements in making and reporting any corporate political contributions

Tax Matters

- It is the Tax Department's responsibility to ensure that Adobe complies with tax regulations and other rules regarding the non-deductibility of expenses for lobbying and electoral activities
- Relevant data regarding lobbying expenses should be forwarded to the Tax Department for appropriate handling
- Questions regarding the classification of particular expenses should be directed to the Tax Department

Lobbying Registration and Reporting

- The Senior Director of Public Policy and Senior Vice President and General Counsel must approve the use of corporate funds for any activity that would result in any lobbying registration and reporting requirements
- All Adobe employees must notify the Senior Director of Public Policy of any activity on Adobe's behalf that results in lobbying registration and reporting requirements
- The Senior Director for Public Policy will fulfill all lobbying registrations and reporting requirements required of Adobe, in compliance with all applicable laws

Testimony, Letters, Meetings, and Public Statements

- Testimony, correspondence, and other oral or written communications representing Adobe's views on state, national, or international public policy or electoral activity must be approved by the Senior Director of Public Policy
- Testimony, correspondence, and other oral or written communications representing Adobe's views on local public policy must be approved by the Director, Corporate Social Responsibility

Questions

- The Employees should direct any questions regarding this policy to the Senior Vice President and General Counsel or Senior Director for Public Policy

Consequences of Non-Compliance

- Non-compliance with this policy may result in substantial legal liability and public embarrassment for Adobe
- As a consequence, disciplinary actions may be taken against an employee for violation of this policy, up to and including termination of employment



Adobe