



# **ADOBE 2020 STATEMENT FOR THE AUSTRALIA MODERN SLAVERY ACT**

5/17/2021



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## ADOBE 2020 STATEMENT FOR THE AUSTRALIA MODERN SLAVERY ACT

### Introduction and who we are

*This section addresses the mandatory criterion of identifying the reporting entity (section 16(1)(a) Modern Slavery Act).*

This is the modern slavery statement (“Statement”) for Adobe Systems Pty Ltd (“Adobe Australia”, “we” or “us”) and is made in accordance with the Commonwealth *Modern Slavery Act 2018* (“Modern Slavery Act”). This Statement constitutes Adobe Australia’s modern slavery and human trafficking statement for its financial year ending November 27, 2020.

Adobe Australia is committed to acting ethically and responsibly and to use its position as one of the largest and most diversified software companies in the world, which enables customers – including students, creative artists, small businesses, government agencies, and the largest global brands—to design and deliver exceptional digital experiences. We believe that creativity can change the world—and we are working with our employees, customers and partners to elevate diverse voices, give back to our communities and build a more sustainable future. Not only do we firmly support and comply with the anti-slavery and human trafficking laws in the countries in which we do business, but we work actively within our business circles to combat slavery and human trafficking.



Adobe

## Approval and Signing

In accordance with section 13 of the *Modern Slavery Act 2018* (Cth), this Modern Slavery Statement has been approved by the Board of Adobe Systems Pty Ltd on May 18, 2021.

Electronically signed by:  
Simon Tate  
Date: May 18, 2021 08:31  
GMT+10

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Signature of **Simon Keith Tate**

Director of Board of Adobe Systems Pty Ltd

Date: 05/18/2021

Electronically signed by:  
Jillian Forusz  
Date: May 17, 2021  
15:29 PDT

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Signature of **Jillian Elizabeth Forusz**

Director of Board of Adobe Systems Pty Ltd

Date: 05/17/2021

Electronically signed by:  
Justin Judd  
Date: May 17, 2021 17:17  
MDT

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Signature of **Phillip Justin Judd**

Director of Board of Adobe Systems Pty Ltd

Date: 05/17/2021



## Our Structure, Operations and Supply Chains

*This section addresses the mandatory criterion of describing the structure, operations and supply chains of the reporting entity (section 16(1)(b) Modern Slavery Act).*

Adobe Australia, a proprietary limited company incorporated and domiciled in Australia, is part of the Adobe group of companies sitting under our ultimate parent entity, Adobe Inc., which is an American publicly-traded company incorporated in Delaware, headquartered in San Jose, California, and listed on the Nasdaq Stock Exchange. Adobe Australia has a wholly owned subsidiary, Business Catalyst Systems Pty Ltd, however this subsidiary has no operations. In this Statement, we refer to the Adobe group of companies globally as the “Adobe Group” and a company within the Adobe Group as an “Adobe Group Entity”.

Since the inception of our Australian operations in 1991, Adobe Australia (with its 450+ employees and ecosystem of partners who are official resellers and distributors of our products) has become a leader in designing and developing exceptional digital experiences, transforming many industries, such as banking, healthcare, government and retail. Our software and services include content creation, marketing, advertising, analytics and commerce.

Adobe Australia supplies very few physical products, although we do have limited physical production and distribution of certain Digital Media and Print and Publishing Business Unit products. For these products we have outsourced our supplier needs to Adobe Systems Software Ireland Limited (“Adobe Ireland”), which has one of their suppliers, located in Singapore, with inventory locations in Singapore, Germany and the U.S. This supplier in Singapore produces packaging for our Digital Media and Print and Publishing Business Unit products. Adobe Ireland’s supplier in Singapore in turn has one subcontractor in Japan that produces product DVDs for our Print and Publishing Business Unit products but does not hold any inventory.

### Where we operate

Adobe Australia’s primary focus is to serve its partners and customers in Australia and it has offices in Sydney and Melbourne.

### Where we source

The majority of goods and services Adobe Australia procures come from suppliers and contractors based in Australia. Adobe Australia’s main categories of procurement include:

- Property/Facilities
- Facilities Services
- Marketing Services
- Information Technology



- Human Resources Services
- Professional Services (i.e. consulting; advisory)

Adobe Australia sells Adobe software licences and services within Australia. Whilst Adobe Australia does not manufacture in the traditional sense with the use of factories or labour houses, Adobe Australia evaluates its supply chain to identify any partners and suppliers that might pose risks for illegal or unethical behavior such as engaging in human trafficking, slavery or other human rights violations.

Adobe Australia oversees a supply chain that includes approximately 75 offshore indirect vendors, the majority of which are in the US. These vendors provide marketing services, technology products and services, non-tech professional services, human resources and facilities services to Adobe Australia.

Adobe Australia outsources manufacturing and fulfillment to a single vendor based in Singapore.

## Modern Slavery Risks in our Operations and Supply Chains

*This section addresses the mandatory criterion of describing the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (section 16(1)(c) Modern Slavery Act).*

### How we identified modern slavery risks

Adobe Australia is in the process of mapping out the modern slavery risks in its operations and supply chains. Given that our wholly owned subsidiary, Business Catalyst Systems Pty Ltd, does not have its own operations or supply chains, we have not included this entity in our risk mapping exercise.

We have also had the benefit of the information in the Modern Slavery Act 2018 – Guidance for Reporting Entities (“Commonwealth Guidance”) and the Global Slavery Index 2018 published by the Minderoo Foundation (“Global Slavery Index”) to inform our identification of modern slavery risks.

### Modern slavery risks identified

**Entity risk evaluation** – The Adobe Group conducts a prioritized, risk-based assessment on its sales partners in the same way that it conducts a risk-based assessment on its suppliers.

Adobe Ireland’s supplier in Singapore performed a risk assessment utilizing the self-assessment tool available through the RBA (Responsible Business Alliance). This supplier has ~~also~~ been assessed as low risk under the Self-Assessment Questionnaire (“SAQ”) and therefore no audits



were required. This supplier uses the SAQ to self-assess risk management systems and identify gaps related to workers' rights and environmental related issues. Pre-COVID, Adobe Systems Pte. Ltd. ("Adobe Singapore") personnel would be present during the assembly production process during product launches and observe the staff working in the warehouse, and we would anticipate this process will resume again when safe to do so.

**Geographic risks** – The Adobe Group has a list of higher-risk countries, which it refers to when considering risks in its supply chains. We have a supplier for our Digital Media and Print and Publishing Business Unit products in Singapore and this supplier has one subcontractor in Japan. Japan and Singapore are countries recognised by the Global Slavery Index as medium risk in terms of their governments' responses to modern slavery.

**Sector risks** – Adobe Australia procures Facilities Services, which include cleaning services. We are aware that cleaning services by their nature are recognised as a higher risk sector. However, the Adobe Group has conducted a risk assessment on our cleaning services provider. Based on the supplier's own internal modern slavery policies and practices, our cleaning services provider is not high risk.

**Product and services risks** – Adobe Australia procures Information Technology ("IT"). Some IT products and services may be higher risk due to the way in which they are produced such as by using low skilled labour.

## Assessing and Addressing Potential and Actual Modern Slavery Risks

*This section addresses the mandatory criterion of describing the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes (section 16(1)(d) Modern Slavery Act).*

The Adobe Group Entities are committed to taking action to assess and address modern slavery risks. The measures described in this section are part of the global approach taken by the Adobe Group. Pursuant to the Modern Slavery Act, the Adobe Group has taken steps to identify the risk of slavery and human trafficking taking place in any of its supply chains and in any part of its business.

The Adobe Group commits publicly to the Responsible Business Alliance ("RBA") [Code of Conduct](#) ("Code") and actively pursues conformance to the Code and its standards as a total supply chain initiative. The Adobe Group also requires business partners and suppliers to agree to its [Business Partner Code of Conduct](#) which outlines necessary management systems to ensure workers' rights are protected and includes abiding by its Labour Standards – Freely Chosen Employment, Child Labour Avoidance, Lawful Employment, Non-Discrimination or



Harassment, Freedom of Association, Safe Conditions, Working Hours, and Wage and Benefits.

The steps taken by the Adobe Group for direct suppliers that produce its products include:

1. Verification: The Adobe Group Companies evaluate and address risks of human trafficking and slavery through conformance to the Code, Section A.I, which states, among other standards, that forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. They pursue conformance by using the RBA'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.I) by inherent risk, sector and location.
  - b. The Supplier Self-Assessment Questionnaire ("SAQ") is a self-evaluation that inquires about demographics and existing policies at the facility level against all sections of the Code.
  - c. The VAP audits carried out on RBA 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.

The Adobe Group conducts these activities annually.

2. Supplier Audits: The Adobe Group either conducts VAP audits or obtains audit reports through RBA'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 the Adobe Group to decide which suppliers to audit by helping to identify risk levels for slave labour or human trafficking practices. The VAP assesses suppliers against the entire RBA Code, including: Labour, 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 RBA Code, Adobe utilises 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: The Adobe Group takes non-compliance with the



RBA Code on slavery and trafficking seriously. The Adobe Group will investigate any alleged instances of non-conformance with the RBA Code, and will initiate corrective action plans in a timely manner, including appropriate disciplinary action, for any identified violations of this policy.

5. Capacity-Building/Training: The Adobe Group encourages suppliers to utilise RBA's Learning Academy which contains online learning modules that cover the RBA 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 RBA Code is a fundamental part of the Adobe Group's efforts to help mitigate the risk of slavery and human trafficking taking place in its supply chains and business.

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

Each Adobe Group Entity requires all of its employees to complete a Code of Business Conduct training every two years. As part of this training, employees provide a written acknowledgement that they have read the Code and that they understand and will comply with the Code. Each Adobe Group Entity enrolls all of its employees in this training.

The Adobe Group liaises regularly with its direct 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 Group employees who have been trained in the Labour Standards and are expected to report anything which appears to contravene the Adobe Group's standards.

#### Supplier Due Diligence – Screening process

The Adobe Group maintains company policies and procedures to guide its actions and establish operating controls to minimise risk exposure for the corporate group. The supplier due diligence procedure sets out the process for onboarding new suppliers and contains the actions required before Adobe Group Entities can do business with any supplier, to ensure



that the Adobe Group has reviewed any identified risks in the relationship or services and the relevant Adobe Group Entities have taken the appropriate measures to address those risks.

Adobe's Vendor Risk Management Office ("VRMO") is responsible for managing this program and collaborates with Adobe's Ethics & Compliance Office, which conducts due diligence activities on suppliers using a risk-based approach.

The program incorporates, among other requirements, supplier screening and re-screening risk assessments to understand the qualifications and associations of the Adobe Group's suppliers. As part of the Adobe Group's supplier onboarding process, suppliers are asked to:

- complete a Compliance questionnaire and a formal declaration as well as provide required documentation via Adobe's Vendor Information Management Portal;
- acknowledge abidance by the Adobe Business Partner Code of Conduct, which requires that they comply fully with key principles such as observing and complying with local and international laws and regulations relating to anti-corruption and anti-bribery as well as human rights, and requirements on the use and disclosure of any personal information in delivery of services; and
- disclose any known conflict of interest.

The Adobe supplier ethics and compliance review additionally requires suppliers to certify key information regarding their enterprise/business, compliance practices, and policies. The Adobe Compliance Office may conduct enhanced due diligence based on the declarations provided by the suppliers or other information related to the suppliers.

Suppliers are re-screened periodically based on their initial risk rating and are required to provide an updated Compliance questionnaire and a company declaration to the Adobe Group.

### Supplier Contracting

The Adobe Group includes specific language in its third party contracts requiring suppliers to comply with its Business Partner Code of Conduct, which states Adobe Group's requirements of its suppliers with regards to local and international laws and regulations relating to anti-corruption and anti-bribery, wages, hours and conditions of employment, discrimination and occupational health/safety.

Contractual terms with suppliers also require that the suppliers do not utilise child, slave, prisoner or any other form of forced, bonded or involuntary labour, or engage in abusive employment or corrupt business practices, in the supply of goods or provision of services.



Governance Programs, Policies and Codes

In order to support compliance and address modern slavery risks throughout its business, the Adobe Group has in place the following governance programs, policies and codes within its ecosystem.

INITIATIVE/PROGRAM	ACTIONS
<p><b>Adobe Code of Business Conduct</b></p>	<ul style="list-style-type: none"> <li>• Adobe’s Code of Business Conduct describes the Adobe Group’s commitment to integrity as a fundamental part of the Adobe Group’s culture and how we do business. The Code of Business Conduct is based on the group’s Core Values: Innovative, involved, Exception and Genuine; the latter value includes integrity, respect, honesty, quality, responsibility and fairness. The Adobe Group’s commitment to being fair and honest is how we maintain trust and credibility with our employees, customers, business partners, stockholders, and communities where we operate.</li> <li>• The Adobe Group’s personnel are trained at regular intervals on the principles embodied within the Adobe Code of Business Conduct and other relevant internal policies. The Adobe Group employees are held accountable for their actions and are subject to disciplinary action for failing to adhere to the Adobe Group’s policies and procedures.</li> <li>• The Adobe Group also maintains company-wide accountability and grievance mechanisms (such as Adobe’s Business Ethics Hotline), which are available to both employees and external business partners, customers and suppliers to raise any concerns regarding unethical or illegal conduct, including where they relate to modern slavery and human trafficking.</li> </ul>
<p><b><u>Adobe Business Partner Code of Conduct</u></b></p>	<p>The Business Partner Code of Conduct sets out the Adobe Group’s expectations for our business partners, suppliers, vendors, contractors, consultants and all other providers of goods and services to conduct business responsibly, with integrity, honesty and transparency and to comply fully with key principles, including respect for human rights and ensuring they observe and comply with local and international principles and laws relating to human rights.</p> <p>The Adobe Group requires all business partners and suppliers to agree to our Business Partner Code of Conduct or have an</p>

INITIATIVE/PROGRAM	ACTIONS
	<p>equivalent policy. Under the Adobe Partner General Terms, our business partners and suppliers must comply with the principles in the Adobe Business Partner Code of Conduct.</p>
<p><b>Adobe Partner Ethics &amp; Compliance Reviews</b></p>	<ul style="list-style-type: none"> <li>• The Adobe Group’s business partners are required to submit themselves to risk assessments and due diligence, and many are required to take compliance training. In addition, business partners must agree to the principles embodied within the Adobe Business Partner Code of Conduct (<b>Business Partner Code of Conduct</b>).</li> </ul> <p>The Business Partner Code of Conduct discourages unethical labour practices including the use of forced or involuntary labour of any kind.</p>
<p><b>Adobe Supplier Ethics &amp; Compliance Reviews</b></p>	<p>The Adobe Group’s Vendor Risk Management Office (<b>VRMO</b>) and Ethics &amp; Compliance Office have in place a Supplier Ethics &amp; Compliance review process to identify and assess supplier risks.</p> <ul style="list-style-type: none"> <li>• The process incorporates supplier screening and risk assessments to understand the qualifications and associations of the Adobe Group’s suppliers, including but not limited to: <ul style="list-style-type: none"> <li>○ business reputation, and relationship, if any, with public sector officials;</li> <li>○ engagement details including nature of goods and / or services being provided; engagement with public sector officials on behalf of an Adobe Group Entity;</li> <li>○ existence of policies, procedures prohibiting bribery, forced labour etc.; and</li> <li>○ determination of red flags and appropriate remediation.</li> </ul> </li> </ul>
<p><b>Responsible Business Alliance (RBA)</b></p>	<p>The Adobe Group commits publicly to the Responsible Business Alliance <u>Code of Conduct</u> (“<b>Code</b>”) and actively pursues conformance to the Code and its standards as a total supply chain initiative. The Adobe Group also requires business partners and suppliers to agree to our <u>Business Partner Code of Conduct</u> which outlines necessary management systems to ensure workers' rights are protected and includes abiding by its Labour Standards – Freely Chosen Employment, Child Labour Avoidance, Lawful Employment, Non-Discrimination or Harassment, Freedom of Association, Safe Conditions, Working Hours, and Wage and Benefits.</p>



The Adobe Group's management, including management of Adobe Australia, believe that the policies and procedures in place appropriately address modern slavery risks for Adobe Australia.

### Areas of opportunity

During Adobe Australia's next reporting period, we are aiming to evaluate our options to update our policies and procedures to address modern slavery risks.

We also plan to conduct additional risk mapping and evaluation of our program. As we enhance our assessment, we will continue to identify, prioritize and respond to risks.

We will give an update in our next Modern Slavery Statement.

### **How we measure the effectiveness of what we are doing**

*This section addresses the mandatory criterion of describing how the reporting entity assesses the effectiveness of its actions (and the actions of any entity that the reporting entity owns or controls) to assess and address modern slavery risks (section 16(1)(e) Modern Slavery Act).*

We wish to keep track of our progress in addressing modern slavery risks.

Adobe Australia has identified actions and outcomes that our assessment of effectiveness could be based on.

Type of activities	Action	Outcomes
<b>Current activities</b>		
Procurement Activities	Assess suppliers using RBA Maplecroft Risk Assessment tool, Supplier Self-Assessment Questionnaire and VAP	Adobe Group has a better understanding of its supply chains and risks.
	Supplier Audits	Adobe Group has a better understanding of its supply chains and risks.
	Vendor Risk Management Office management of program for screening and re-screening risk assessments of Adobe's suppliers	Adobe Group has a better understanding of its supply chains and risks.
	Adobe Group's Supplier Ethics & Integrity Program requiring suppliers to certify key information about their	Suppliers better understand Adobe Group's expectations of business conduct.

Type of activities	Action	Outcomes
	compliance practices and policies.	
	Having contractual terms requiring compliance with laws and that no forced, bonded or involuntary labour used.	Suppliers better understand expectations of Adobe Group in relation to modern slavery.
Capacity building and awareness raising	Encouraging suppliers to use RBA's Learning Academy, which includes modules on the RBA Code of Conduct.	Suppliers have a better awareness of RBA Code of Conduct expectations and understand expectations of Adobe Group in relation to modern slavery.
	Requiring Adobe Group employees to undertake Code of Business Conduct training	Our employees better understand the expectations in the Code of Business Conduct.
Supplier activities	Liaising with its supplier and conducting monthly visits to review production area	Increase in supplier engagement and better awareness of Adobe's expectations.
Policies and procedures	Having the Adobe Code of Business Conduct and Adobe Business Partner Code of Conduct in place	Suppliers have a better awareness of Adobe Group's expectations.
<b>Future activities</b>		
Policies and procedures	Evaluate potential updates to our policies and procedures to address modern slavery risks.	Updates may improve the Adobe's business partners' understanding of Adobe's expectations.

## Consultation

*This section addresses the mandatory criterion of describing the process of consultation with any entities that the reporting entity owns or controls (section 16(1)(f) Modern Slavery Act).*

Given that Business Catalyst Systems Pty Ltd has no operations, consultation with this entity is not relevant. Adobe Australia has consulted with Adobe Inc., Adobe Ireland and Adobe Singapore when preparing this Statement. Consultations occurred by email communications and discussions between the entities' key stakeholders.

## Any other relevant information

*This section addresses the mandatory criterion of any other relevant information (section 16(1)(g) Modern Slavery Act).*



### Other reporting obligations

Entities in the Adobe group have been subject to other jurisdictions' reporting obligations. Adobe Inc. has provided transparency statements under the California Transparency in Supply Chains Act of 2010. Adobe Systems Software Ireland Ltd has reported under the United Kingdom (UK) Modern Slavery Act 2015. We consider the implementation of these reporting regimes as important developments in combatting modern slavery and human trafficking around the world.

### Impact of COVID-19

During COVID-19, Adobe Australia has experienced an increased demand for its products and services as workplaces implemented work-from-home practices in a short period of time. We also had to divert resources to keep our people and customers safe during the pandemic. Accordingly, some of the measures which we had originally planned to help identify and address modern slavery risks have been postponed.