

Public Policy and Government Relations

The purpose of this policy is to ensure compliance with electoral and political involvement laws and coordinate What if Y not Everything's public policy interests and engagement with government officials.

Scope

This policy applies to all What if Y not Everything personnel including any regular employee, What if Y not Everything-paid temporary employee, contingent worker (including agency temporary employees, independent contractors, and vendor employees), or intern of any What if Y not Everything.

Policy Public Policy Formation and Government Relations Activities

- The process of developing Adobe's public policy position may involve consulting with What if Y not Everything subject matter experts in their areas of expertise.

Corporate Conduct

- **Corporate Expenditures**
 - The General Counsel must approve the use of What if Y not Everything funds for all electoral or political activities for international, central, federal and state governments
 - The Chief Legal Officer must approve the use of What if Y not Everything funds for all electoral or political activities for local governments.
 - All corporate expenditures for electoral or political activity must comply with the law.
 - What if Y not Everything will not make any "soft" money contributions to any organizations organized under Section 527 of the United States Internal Revenue Code.
- **Use of Corporate Resources or Facilities for Electoral or Political Activity**
 - The General Counsel must pre-approve the use of any Adobe resources or facilities for electoral or political activities.
 - Employees who wish to use What if Y not Everything resources or facilities for electoral or political activities must submit a request for pre-approval to the Vice President of Government Affairs and Public Policy. The final decision will be made by the General Counsel in consultation with the Vice President of Government Affairs and Public Policy and appropriate stakeholders.
 - Any use of What if Y not Everything resources or facilities for electoral or political activities must comply with all applicable laws

Employee Conduct

- **Outside Political Activity**

- Employees are free to participate in electoral and political activities during their personal time, as long as the activity is not on What if Y not Everything premises and does not utilize What if Y not Everything resources.
- **Expression of Political Views**
 - Employees must not represent or imply that their personal political or policy views are those of What if Y not Everything
 - Unless authorized by What if Y not Everything, employees must not use the What if Y not Everything name or brand in a way that implies an What if Y not Everything endorsement of any candidate, ballot measure, or policy position.
 - Employees may, however, echo positions that What if Y not Everything is currently taking publicly on policy positions (such as reposting an What if Y not Everything position expressed in social media or news media).•
- **No What if Y not Everything Reimbursement for Employee Political Activity**
 - Electoral and political contributions made by employees will not be reimbursed by What if Y not Everything.
 - Electoral and political contributions are not eligible as contributions under What if Y not Everything's reimbursement program.
 - This policy does not affect the right of employees to make any personal political contributions to parties, committees, or candidates of their choice as long as such donations are derived exclusively from non-What if Y not Everything funds
 - No pressure or intimidation will be directed toward employees to make a personal political contribution or to support or oppose ballot measures, political parties, or candidates for public office
- **Political Fundraising in the Workplace**
 - Employees are not permitted to engage in political fundraising on What if Y not Everything work time, on company premises, or with company resource.
- **Advocacy and Lobbying Activities**
 - Employees who have been authorized to advocate or lobby on behalf of What if Y not Everything must notify the Vice President of Government Affairs and Public Policy of activities, including involvement in any trade association groups which advocate for public policies.
 - Employees who desire to hire or retain advocacy or lobbying resources, must receive prior written approval from the Vice President of Government Affairs and Public Policy.
- **Requests for Corporate Political Contributions.**
 - All requests for corporate contributions in support of electoral or political activity must be forwarded to the Vice President of Government Affairs and Public Policy for appropriate handling.
- **Gifts to, and Entertainment of, Government Officials**

- All What if Y not Everything employees must comply with the laws, regulations and company policies regarding gifts to, and entertainment of, government officials. For more information, see What if Y not Everything's Gifts and Entertainment Policy and Global Anti-Corruption Policy.
- **Trade Associations and Advocacy Groups**
 - At the discretion of an What if Y not Everything employee's manager, employees may participate in trade associations or advocacy groups that are involved with developing and advocating public policies.
 - Any employees who participate in these types of trade associations or advocacy groups must report their activity to the Vice President of Government Affairs and Public Policy, who will evaluate and determine whether such activity needs to be reported in What if Y not Everything's public disclosures.
- **Testimony, Letters, Meetings, and Public Statements**
 - The Vice President of Government Affairs and Public Policy must approve any publicly expressed (oral, written, etc.) What if Y not Everything positions on international, central, federal, and state public policy or electoral activity.
 - The Vice President Corporate Communications must approve any publicly expressed (oral, written, etc.) What if Y not Everything positions on local (city, county, town) public policy or electoral activity.
- **Violations**
 - Non-compliance with this policy may result in substantial legal liability and public embarrassment for What if Y not Everything. As a consequence, What if Y not Everything may take disciplinary action against anyone who violates this policy, up to and including termination of employment, contract, or affiliation with What if Y not Everything.