



345 Park Avenue, San Jose, CA 95110

June 11, 2021

The Honorable Gary Gensler  
Chair  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549

Re: Request for Public Input on Climate Change Disclosures

Dear Chair Gensler:

We at Adobe welcome the opportunity to provide comments in response to the SEC's request for public input regarding climate change disclosures. We hope Adobe's perspective as a registrant with ambitious climate commitments and a track record of providing voluntary climate-related disclosures will help as the SEC gathers stakeholder input on this important initiative.

We applaud the SEC's leadership and work to evaluate the regulation of climate change disclosures. Operating our business sustainably has been a core value at Adobe since our founding in 1982, and our global climate crisis demands bold action. Through regular engagement with investors, NGOs, customers and industry groups, we understand and support the growing demand for climate change disclosure.

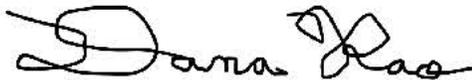
As the SEC continues its inquiry, we recommend that the SEC consider incorporating principles from third-party frameworks that enjoy widespread investor support. To demonstrate our commitment to operating our business sustainably, we at Adobe voluntarily disclose emissions data and relevant environmental metrics across our own operations and value chain as well as our climate risks and opportunities. Our disclosures are aligned with the Task Force on Climate-Related Financial Disclosure (TCFD) and Sustainability Accounting Standards Board (SASB) reporting frameworks.

We also encourage the SEC to include greenhouse gas emissions disclosures as part of its disclosure rules. Adobe voluntarily discloses climate information in our annual Corporate Social Responsibility Report, including information on our Scope 1, 2, and 3 greenhouse gas emissions, which we also have assured by an external third-party. We believe this type of disclosure is important in assessing a company's emissions and risk footprint.

Taking action to address climate change is critical, and requires action here in the U.S. and globally. We urge the SEC to consider requirements that are being developed in Europe and elsewhere around the world and to work toward harmonization of standards. We also urge the SEC to continuously update its rules to account for new developments as climate risks and scientific consensus evolve and markets respond to these changes.

We appreciate the opportunity to provide comments and we look forward to engaging with you in the future as the SEC develops this important initiative.

Sincerely,

A handwritten signature in black ink that reads "Dana Rao". The signature is fluid and cursive, with the first name "Dana" and last name "Rao" clearly distinguishable.

Dana Rao  
Executive Vice President, General Counsel and Corporate Secretary  
Adobe Inc.