

Code of Corporate Social Responsibility

It is the policy of Analog Devices, Inc. (ADI) to conduct its business in accordance with all applicable laws, rules, and regulations of the jurisdictions in which it does business. Compliance with applicable laws and regulations is mandated by our [ADI Code of Business Conduct and Ethics](#). ADI is a member of the Responsible Business Alliance (RBA). ADI has adopted and agreed to comply with the [RBA Code of Conduct \(RBA Code\)](#) and RBA Program. The ADI Code of Business Conduct and Ethics and this Code draw upon internationally recognized standards that promote integrity, human rights, safety, social and environmental responsibility, and embody principles outlined in the OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, ILO Fundamental Conventions, and UN Universal Declaration of Human Rights. Our commitment to these principles is communicated in this Code as well as our company policies.

ADI also expects its suppliers to operate in compliance with the laws, rules, and regulations in the countries in which they operate. ADI requires its suppliers to implement the principles of this Code, and to communicate the same to their own suppliers. Failure to comply with applicable laws, and principles of this Code may result in corrective actions, up to and including termination of the business relationship with ADI.

We understand that for us to meet our commitments under this Code, we must routinely evaluate our policies and improve our procedures. ADI is committed to continuous improvement within our operations and throughout our value chain. Our Code of Corporate Social Responsibility will be maintained and made available online. If you have any questions regarding the requirements of this Code, please contact ADI's Ethics and Compliance team at ethics.compliance@analog.com.

Labor and Human Rights

Wages and Benefits

ADI requires that workers be paid for all hours worked at least the minimum wage required by applicable laws and regulations and be provided all legally mandated benefits. ADI requires that workers be compensated for any overtime hours at pay rates greater than regular hourly rates. Deductions from wages should not be used as a disciplinary measure. In addition to meeting legal requirements, ADI requires that workers receive equal pay for equal work and qualifications. Furthermore, ADI strives to pay a living wage and encourages its suppliers to provide its workers with a living wage, and ensure pay equity, paid vacation, sick leave, and family medical leave.

Working Hours

Workweeks shall not exceed the maximum working hours set by local law. Except in emergency or unusual situations, ADI requires that a workweek be restricted to 60 hours, including overtime, and workers be allowed at least one day off per seven-day week. Workers shall be offered vacation time, leave periods, and holidays consistent with applicable laws and regulations.

Non-Discrimination

ADI prohibits discrimination based on race, ancestry, national origin, social or ethnic origin, color, age, sex, gender, gender identity, gender expression, pregnancy and/or parental status, sexual orientation, disability, medical condition, genetic information, religion, military or veteran status, political affiliation, union membership, or marital status in hiring and employment practices.

Child Labor

ADI prohibits child labor in all forms. In this Code, the term “child” refers to any worker under the age of 16 unless the age for completing compulsory education, or the minimum age for employment in the country is greater than 16. This does not prohibit legitimate workplace apprenticeship programs which comply with applicable laws and regulations. ADI prohibits workers under the age of 18 from engaging in work with an increased risk of jeopardizing a worker’s health or safety, overtime, or night-shift work.

Humane Treatment

ADI requires that workers be treated with dignity and respect. ADI prohibits harsh or inhumane treatment of workers or threatening workers with such treatment, including, but not limited to violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse.

Involuntary Labor

ADI prohibits forced, bonded, indentured, or prison labor, and all forms of slavery and human trafficking. ADI requires that workers be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment, unless such holdings are required by law. ADI prohibits any requirement that obligates workers to pay employers’ or agents’ recruitment fees or other related fees for their employment. ADI also prohibits extra-contractual, undisclosed, inflated, or illicit fees imposed on workers. If any such fees are found to have been paid by workers, ADI requires that workers be reimbursed for those fees. For more information please refer to the [ADI Anti-Slavery and Human Trafficking Statement](#).

Freedom of Association and Expression

The rights of workers to associate freely, form and join worker organizations of their own choosing, seek representation, and bargain collectively, free from both interference and financial support from management, as permitted by and in accordance with applicable laws and regulations, shall be respected and should not affect employment standards. ADI requires that workers be permitted to communicate openly with management regarding working conditions without fear of discrimination, reprisal, intimidation, or harassment.

Health and Safety

Occupational Health and Safety

ADI has implemented and will continuously seek to improve measures that identify and manage workplace hazards. ADI employs a systematic approach such as the Hierarchy of Controls. This involves eliminating hazards where possible, substituting materials or processes, implementing engineering and administrative controls, and providing ongoing training. Personal protective equipment shall be provided as needed to anyone on the worksite, whether at ADI facilities or other locations where work is being done on behalf of the company. Workers and others shall have the right to raise safety concerns without fear of retaliation. They may also remove themselves from situations which constitute an immediate and serious threat to their health and safety and report the hazard through appropriate channels to respond to the situation.

Emergency Preparedness

ADI requires that emergency plans and response procedures be implemented, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

Occupational Injury and Illness

ADI requires the establishment of procedures and systems to prevent, manage, track, and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, investigate cases, implement preventative corrective measures, provide, or arrange for necessary medical treatment, and facilitate the affected individual's return to work.

Industrial Hygiene

ADI takes appropriate steps to ensure that workers' exposure to hazardous, chemical, biological, and physical agents is identified and controlled. ADI requires that in situations where exposure to hazardous material is possible there is appropriate monitoring and anyone in the area or working with hazardous materials is provided with the appropriate personal protective equipment, as necessary. Where appropriate, signage shall be posted by management to ensure awareness of the exposure to workplace hazards.

Physically Demanding Work

ADI requires that workers' exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks, be assessed, with efforts made to implement appropriate engineering or administrative controls to mitigate these tasks' effects.

Machine Safeguarding

ADI requires that equipment and machinery be assessed for hazards. Physical guards, interlocks, and barriers shall be utilized where potential worker exposure to equipment hazards has been identified.

Dormitory and Canteen

ADI requires that workers have access to clean toilet facilities, potable water, and sanitary food preparation and storage facilities. ADI requires that dormitories provided to workers be clean and safe with adequate emergency egress, heat and ventilation, and reasonable personal space.

Training

ADI requires that adequate safety training be provided to all workers at the start of their employment, with subsequent job- or task-specific training provided depending on the type of work or potential hazards encountered. ADI requires that training be provided by qualified experts during paid working hours.

Environmental

Environmental Permits and Reporting

Environmental permits (e.g. wastewater discharge) and licenses shall be obtained, maintained, and kept current, as required by law, and operational and reporting requirements of such permits followed.

Hazardous Substances

ADI complies with applicable laws and regulations prohibiting or restricting specific hazardous substances. ADI requires that substances that pose a hazard if released to the environment be identified and managed to ensure safe handling, movement, storage, recycling, reuse, and disposal, in compliance with applicable labeling laws and regulations for recycling and disposal. ADI requires that hazardous waste data be tracked and documented. Emergency response protocols shall be followed for any significant releases of hazardous substances impacting the local community, with notification given to local emergency response services and government authorities, where required.

Wastewater and Solid Waste Emissions

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities shall be monitored, controlled, and treated as required by applicable laws and regulations before discharge or disposal. ADI requires that non-hazardous waste data be tracked and documented.

Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations shall be characterized, monitored, controlled, and treated as required by applicable laws and regulations before discharge.

Pollution Prevention and Resource Conservation

ADI requires that waste be reduced or eliminated by recycling, re-using, or substituting materials, and natural ecosystems be protected through pollution prevention. ADI requires that water and energy usage be managed by implementing appropriate conservation measures in manufacturing and facilities operations.

Ethics

No Corruption, Extortion, or Embezzlement

ADI prohibits corruption, extortion, and embezzlement, in any form, throughout ADI's value chain. In the event we identify and validate corruption, extortion or embezzlement, ADI reserves a right to legal action and/or immediate termination of the business relationship.

No Improper Advantage

ADI prohibits bribes or other means of obtaining undue or improper advantage from being offered or accepted.

Disclosure of Information

Business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable laws and regulations.

Fair Business, Advertising, and Competition

ADI requires implementation of fair business standards in advertising, sales, competition, and procedures to safeguard customer information.

Whistleblower and Remedy Process

Processes are in place to enable anyone, including ADI employees, contractors or employees of ADI suppliers, the local community, and other external stakeholders to report concerns through ADI's Ethics Hotline (online at analog.ethicspoint.com, by phone, or through mobile access). ADI's Ethics Hotline is operated by an independent third party and allows anonymous reporting. ADI will promptly investigate allegations and pursue action to remediate any adverse labor and human rights, ethics, health and safety, or environmental impacts within its own operations and along its value chain. ADI reserves the right to take corrective actions up to and including terminating the relationship with its business partners, depending on the severity of the wrongdoing.

ADI does not tolerate retaliation against anyone who in good faith reports possible violations of the law, ADI's Code of Business Conduct and Ethics, this Code, or other company policies or procedures, or participates in an internal investigation. ADI trains its employees on the ADI Code of Business Conduct and Ethics and takes proactive steps to prevent retaliation. Everyone in ADI's value chain shall ensure that its workers do not face retaliation for good faith reporting or participation in whistleblower investigation processes.

Protection of Intellectual Property

ADI requires that intellectual property rights be respected, and the transfer of technology and know-how be done in a manner that protects intellectual property rights. ADI requires the adoption of appropriate controls to protect intellectual property and confidential information.

Management Systems

Supplier Responsibility

ADI suppliers are expected to maintain employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the [RBA Code of Conduct](#), this Code and the [ADI Code of Business Conduct and Ethics](#).

Communication, Performance Review, and Continuous Improvement

A corporate social and environmental responsibility statement affirming commitments to compliance and continual improvement should be posted in workplace, made public, and communicated to workers in language they understand. An ongoing two-way communication process with workers and other stakeholders shall be established to provide information about performance, practices, and expectations to obtain their feedback and to foster continuous improvement.

Due Diligence, Audits, and Assessments

ADI is committed to conduct due diligence of its own manufacturing and its identified key suppliers consistent with the values expressed in this Code. Periodic self-evaluations should be conducted to ensure compliance with applicable legal and regulatory requirements and this Code, and reasonable efforts should be undertaken to notify next tier suppliers of the requirements of this Code and compliance with applicable laws and regulations.

Corrective Action Process

A process for the timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, or review should be maintained and applied.

Documentation and Records

Documents and records shall be maintained to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

Data Privacy

ADI is committed to protecting the personal information of employees, customers, vendors, business partners, and other third parties. We do so by fostering a culture that values privacy and encourages caution about the use of personal information. To raise awareness of privacy issues, ADI provides transparency about the company's privacy program, trains employees, and implements sound corporate practices. ADI expects its suppliers who handle personal information to do so in accordance with its contractual obligations and applicable data protection laws.

For more information, please see ADI's [Privacy Policy](#).