

Anti-Slavery and Human Trafficking Statement

June 8, 2023

Introduction. Analog Devices, Inc. (NASDAQ: ADI) is a global semiconductor leader that bridges the physical and digital worlds to enable breakthroughs at the Intelligent Edge. ADI combines analog, digital, and software technologies into solutions that help drive advancements in digitized factories, mobility, and digital healthcare, combat climate change, and reliably connect humans and the world. With revenue of more than \$12 billion in FY22 and approximately 25,000 people globally working alongside 125,000 global customers, ADI ensures today's innovators stay Ahead of What's Possible. ADI is committed to trading ethically, sourcing responsibly and protecting human rights throughout our organization and in our supply chain.

Legal Statement: On January 1, 2012, the California Transparency in Supply Chains Act of 2010 went into effect. The law requires companies to make certain website disclosures regarding their efforts to eradicate slavery and human trafficking within their supply chains. In October 2015, the United Kingdom's Modern Slavery Act also became effective. It requires companies with operations in the UK to disclose their efforts to eliminate slavery and human trafficking in their business and their supply chain. The Federal Acquisition Regulation FAR 52.222-50 ("Combatting Trafficking in Persons") and FAR provision 52.222-56 ("Certification Regarding Trafficking in Persons Compliance Plan") are aimed at removing slavery and human trafficking from the U.S. Federal Government contracting supply chain.

<u>Policies and Standards.</u> ADI recognizes that slavery and human trafficking can occur in many forms, such as forced labor, child labor, domestic and indentured servitude, sex trafficking, and workplace abuse. We maintain appropriate policies in place that underpin our commitment to prevent slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

ADI is a member of the Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to electronics supply chain responsibility. Therefore, we agreed to comply with the RBA Code of Conduct (RBA Code) and not only use it within our own operations but also expect our suppliers to comply with it as well. The RBA Code contains standards intended to eradicate slavery and human trafficking in the electronics supply chain. These standards promote best practices in a number of areas affecting human rights, including freely chosen employment, child labor avoidance, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association. RBA's audit process is a critical component to our strategy for ensuring the protection of human rights in our supply chain.

In alignment with RBA Code, ADI's <u>Code of Corporate Social Responsibility</u> and <u>Code of Business Conduct and Ethics</u> (ADI Codes) draw upon internationally recognized standards to promote ethical conduct, social and environmental responsibility in the workplace and its business. ADI Codes expressly represent that ADI does not use forced, involuntary or child labor in any of our facilities, and further lays out the following principles against involuntary labor:

- Forced, bonded, indentured, or prison labor should not be used in the workplace.



- All work must be voluntary, and workers should 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.
- Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Supply Chain Due Diligence. Before conducting business with Analog Devices, new ADI suppliers are required to sign Supplier's Ethics Commitment, which requires compliance with human rights, child and involuntary labor laws everywhere they do business, and agree to comply with ADI Codes and RBA Code. In addition, we require our key suppliers to complete a self-assessment questionnaire that asks a number of questions about corporate social responsibility, including questions to access suppliers' compliance with human rights standards. Key suppliers are vetted on risks associated with human rights, bribery/corruption, labor and employment, intellectual property risk, data privacy, conflict minerals and trade compliance including sourcing from sanctioned countries. These suppliers will also be reviewed on an ongoing basis through our enhanced due diligence tool. Our standard Terms and Conditions of Purchase and our standard service agreements also contain clauses that (1) require full compliance with all applicable laws and regulations on employment, labor, and human rights, and (2) pass down the RBA Code to our vendors and service providers and require notification in the event of noncompliance.

Our agreements with our key suppliers also give us rights to audit their compliance with the RBA Code. Every two years, certain ADI suppliers have a validated assessment program (VAP) compliance audit, scheduled and conducted by an independent, third-party auditor that has been approved by the RBA and is specially trained in social and environmental auditing and the VAP protocol. ADI can nominate a supplier for a VAP audit if their Self-Assessment Questionnaire (SAQ) raises concerns. If an audit revealed a supplier's non-compliance, the supplier is given a specified period of time to remedy the findings and implement systems to prevent reoccurrences. We report to the RBA as part of our compliance requirement on how many of the ADI-owned facilities and supplier facilities have completed the SAQs and if there were any significant findings from any of the audits on those suppliers.

<u>Training</u>. All ADI employees receive ethics and compliance training on the ADI Codes, which prohibits forced labor and child labor. Employees must certify that they have read, understand and will comply with the ADI Codes. Employees in our purchasing departments, involved with suppliers are trained in ADI Codes and to assess and mitigate risks within the supply chains of products, and to report any observed violations.

Whistleblower Program. ADI has a process to enable anyone, including employees, contractors, employees of ADI suppliers and other external stakeholders, to report concerns through ADI's third party-operated Ethics Hotline (online at www.analog.ethicspoint.com or by phone). ADI's toll-free Ethics Hotline allows for anonymous reporting, when permitted by applicable law. ADI has developed processes to ensure that reports are promptly reviewed and corrective actions are implemented, if appropriate, and the outcome of the investigation is conveyed to the reporter and respondent. ADI prohibits retaliation against anyone who in good faith makes a



report assists ADI is identifying or investigating suspected violations of ADI Codes or the law. Additionally, ADI takes proactive steps to prevent retaliation.

Non-Compliance. Everyone who works for ADI and its subsidiaries including independent contractors, consultants, and agents who provide services to ADI are expected to comply with ADI Codes, policies and guidelines and applicable laws. Failure to comply with the Code or applicable laws may result in disciplinary action, up to and including termination of the employment or business relationship with ADI.

Conclusion. This statement has been made in accordance with the reporting requirements of Section 54(1) of the UK Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 (SB 657). This statement applies to all parts of the ADI, including subsidiaries and controlled joint ventures.

The CEO, Chair of the Board, and the Chief Legal Officer are authorized to develop and implement policies and standards consistent with this Statement.

This statement was approved at the Board meeting on June 8, 2023, and has been signed by the Chairman, on behalf of the Board of Directors.

Chairman of the Board

Unicout Roche