

Code of Corporate Social Responsibility

It is Analog Devices, Inc.'s (ADI) policy to conduct its business in accordance with all applicable laws, rules and regulations of the jurisdictions in which it does business. In addition, ADI has adopted this Code and a Code of Business Conduct and Ethics that draws upon internationally recognized standards to promote social and environmental responsibility in the workplace and its business. ADI is committed to ensuring that its employees are treated with respect and dignity and that its manufacturing processes are environmentally responsible.

ADI also expects its suppliers to operate in compliance with the laws, rules, and regulations in the countries in which they operate and to implement the principles of this Code.

ADI will continue to reassess and update our Code of Corporate Social Responsibility to keep abreast of the many changes within our industry. Our Code of Code of Corporate Social Responsibility will be maintained and available online. If you have any questions regarding the requirements of this Code, please contact ADI's Legal Compliance team.

Labor and Human Rights

Wages and Benefits

Workers should be paid at least the minimum wage required by applicable laws and regulations and provided all legally mandated benefits. In accordance with local laws, workers should be compensated for any overtime hours. Deductions from wages should not be used as a disciplinary measure. In addition to meeting legal requirements, ADI encourages its suppliers to provide its workers with a living wage, ensure pay equity, and to provide paid vacation, sick leave, and family medical leave.

Working Hours

Workweeks should not exceed the maximum set by local law. Except in emergency or unusual situations, a workweek should be restricted to 60 hours, including overtime, and workers should be allowed at least one day off per seven-day week. Under no circumstances may workweeks exceed the maximum permitted under applicable laws and regulations. Suppliers must offer vacation time, leave periods, and holidays consistent with applicable laws and regulations.

Non-Discrimination

Workers should not be discriminated against based on race, ancestry, national origin, social or ethnic origin, color, age, sex, gender, gender identity, or gender expression, pregnancy and/or parental status, sexual orientation, ethnicity, disability, medical condition, genetic information, religion, military or veteran status, political affiliation, union membership, or marital status in hiring and employment practices.

Child Labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. This does not prohibit legitimate



workplace apprenticeship programs which comply with applicable laws and regulations. Hazardous work, overtime, or night-shift work should not be performed by workers under the age of 18.

Humane Treatment

Workers should not be subject to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse. Suppliers should ensure workers are treated with dignity and respect.

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.

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, should be respected. Workers should be permitted to communicate openly with management regarding working conditions without fear of discrimination, reprisal, intimidation or harassment.

Health and Safety

Occupational Safety

Appropriate controls, safe work procedures, preventative maintenance, and protective measures (such as physical guards, interlocks, and barriers) should be used in the workplace to mitigate health and safety risks. Workers should be provided with appropriate personal protective equipment in situations where hazards cannot be adequately controlled by such means. Workers should have the right to raise safety concerns without fear of reprisal.

Emergency Preparedness

Emergency situations and events should be identified, and emergency plans and response procedures 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

Procedures and systems should be established to manage, track, and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate the employee's return to work.



Industrial Hygiene

Workers exposure to hazardous, chemical, biological and physical agents should be identified and controlled. Workers should be provided with the appropriate personal protective equipment when necessary.

Physically Demanding Work

Workers exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks, should be identified and controlled.

Dormitory and Canteen

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

Environmental

Environmental Permits and Reporting

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

Hazardous Substances

Suppliers should comply with applicable laws and regulations prohibiting or restricting specific hazardous substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, suppliers should identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal. Workers who will come into contact with such substances in the workplace should be trained on the safe handling of such substances.

Wastewater and Solid Waste Emissions

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities should be monitored, controlled, and treated as required by applicable laws and regulations before discharge or disposal.

Air Emissions

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

Pollution Prevention and Resource Reduction

Suppliers must endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in its facilities, in its maintenance and production processes, and by recycling, re-using, or substituting materials.



Ethics

No Corruption, Extortion, or Embezzlement

Corruption, extortion, and embezzlement, in any form, are strictly prohibited and may result in immediate termination as an ADI supplier and in legal action.

No Improper Advantage

Bribes or other means of obtaining undue or improper advantage may not be offered or accepted.

Disclosure of Information

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

Fair Business, Advertising, and Competition

Fair business standards in advertising, sales, and competition should be upheld and means to safeguard customer information should be available.

Whistleblower and Remedy Process

Processes are in place to enable anyone, including contractors or employees of ADI suppliers, and other external stakeholders to report concerns through ADI's third party-operated Ethics Hotline. ADI will promptly investigate allegations and pursue action to correct any adverse labor and human rights, health and safety, environmental, or ethics impacts.

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, Code of Corporate Social Responsibility or other company policies or procedures, questions on-going or proposed conduct, 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.

ADI suppliers should also ensure that its workers do not face retaliation for good faith reporting or participation in whistleblower investigation processes.

Community Engagement

ADI supports community engagement to help foster social and economic development in the communities that it operates in. ADI suppliers should seek to positively impact communities they operate in.

Protection of Intellectual Property

Intellectual property rights should be respected, and the transfer of technology and know-how should be done in a manner that protects intellectual property rights. Suppliers should take all steps necessary to protect ADI's intellectual property and confidential information.



Management Systems

Supplier Responsibility

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

Communication

A corporate social and environmental responsibility statement affirming the supplier's commitment to compliance and continual improvement should be posted in the supplier's workplace and communicated to its workers. Clear and accurate information about the supplier's performance, practices, and expectations should also be communicated to its workers, suppliers, and customers.

Worker Feedback and Participation

All ADI suppliers should maintain an ongoing process to obtain feedback on processes and practices related to this Code and to foster continuous improvement.

Audits and Assessments

Periodic self-evaluations should be conducted to ensure compliance with applicable legal requirements and this Code and reasonable efforts should be undertaken to notify all next tier suppliers of the requirements of this Code and 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 should 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 individuals' personal information and fostering a culture that values strong business practices as well as individual privacy and encourages caution about the use of personal information. ADI is committed to raising awareness about privacy issues by providing transparency about the company's privacy program, training employees, and implementing good corporate practices. For more information, please see ADI's <u>Privacy Policy</u>.