

Statement on Slavery and Human Trafficking

December 1, 2016

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.

Analog Devices does not use forced, involuntary or child labor. We are members of the Electronics Industry Citizenship Coalition (EICC), which is the world's largest industry coalition dedicated to electronics supply chain responsibility. Therefore, we subscribe to the Electronic Industry Code of Conduct (EICC Code) and not only use it within our own operations but also expect our key suppliers to recognize the EICC Code as well.

The EICC 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.

<u>Evaluation of Supply Chain and Certification</u>. We require our key suppliers to complete a self-assessment questionnaire that asks a number of questions about corporate social responsibility, including several questions about our suppliers' compliance with these human rights standards. We also ask our key suppliers to sign agreements that represent that they comply with the EICC Code and that they will notify us if they fall out of compliance. Our standard terms of purchase and our standard service agreements also contain clauses that pass down the EICC Code to our vendors and service providers and require notification in the event of noncompliance.

<u>Supplier Audits and Accountability</u>. Our agreements with our key suppliers also give us rights to audit their compliance with the EICC Code. In addition to random audits, if a supplier's self assessment questionnaire indicates that they fail to comply with the provisions of the EICC Code, they would be a candidate for audit. If an audit revealed a supplier's non-compliance, ADI would require the supplier take corrective actions to resolve the non-compliance. If the non-compliance is not corrected in a satisfactory time frame, we would cease to use them. In addition, ADI employees regularly visit the facilities of some of our key suppliers, putting them in a position to report any observed violations of the EICC Code.

<u>Training</u>. We require our employees to take training on the Analog Devices Code of Business Conduct and Ethics, which prohibits forced labor and child labor. In addition, all employees must take a training course on Corporate Social Responsibility. This course educates Analog Devices employees on the EICC Code. The course specifically addresses the principles of freely chosen employment, child labor avoidance, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association. Employees must certify that they have read, understand and will comply with the EICC Code. Employees in our purchasing and quality departments, as well as resident engineers, involved with suppliers are trained in the EICC Code and instructed to report any observed violations.

<u>Hotline</u>. ADI has established an anonymous toll-free Business Ethics Hotline operated by an independent third party, NAVEX Global. Within the US, Canada and US territories, dial toll-free 1-800-381-6302. Callers outside of the US, Canada, and US territories should dial their country-specific AT&T direct access code, which can be found at this <u>website</u>. Once the caller is connected with AT&T, the caller will be prompted to dial the hotline number, 800-381-6302. Callers in China should dial 4008811475.