

Integrity Powers Growth

ADI: Code of Business
Conduct and Ethics



VISIT [ANALOG.COM](https://www.analog.com)
JANUARY 2023



AHEAD OF WHAT'S POSSIBLE™



Analog Devices, Inc. (“ADI”) has a long history of excellence in our products and customer partnerships, but also in our business practices and the caliber of our people. At ADI, we have an uncompromising commitment to ethics and integrity and this drives all of our business decisions. That ethical commitment has enabled us to build a strong foundation of trust with our customers, and maintain successful business partnerships.

This Code of Business Conduct and Ethics reflects our continued commitment to integrity and outlines ADI’s approach to conducting business ethically, in compliance with the law, and in a way that reflects our deeper values.

Please take the time to read, understand, and internalize this Code of Business Conduct and Ethics. Use it as a guide and resource if you have questions or concerns about ethical business conduct at ADI. It is everyone’s responsibility to uphold our company values and continue to build upon the foundation of trust we have inherited.

Vincent Roche, Chief Executive Officer and Chairman

Table of Contents

- 4 // ***Introduction: Integrity Powers Growth***
- 6 // ***Integrity Powers Culture***
 - Mutual Respect and Non-Discrimination
 - Workplace Conditions and Natural Resources
 - Corporate Social Responsibility
- 9 // ***Integrity Powers Fair Business Practices***
 - Transparency and Fairness
 - Gifts and Entertainment
 - Anti-Bribery and Anti-Corruption
- 12 // ***Integrity Powers Trust***
 - Financial Reporting, Recordkeeping and Public Communications
 - Conflicts of Interest
 - Government Inquires and Investigations
 - Social Media Use
 - Data Privacy
- 17 // ***Integrity Powers Responsibility***
 - Intellectual Property
 - Confidentiality
 - Use of Assets
 - Trading Stock
 - International Trade
- 22 // ***Conclusion: Integrity Powers Courage***
 - How to Make a Report
 - After the Report
 - No Retaliation

Introduction: Integrity Powers Growth

At Analog Devices, Inc. (ADI), integrity defines our culture. It transcends all that we do and enables us to be the Company we want to be. **Integrity** is critical to moving the Company forward and allowing us to innovate. It enables us to attract and retain the best people. In short, **Integrity Powers Growth.**

We have a Code because...it outlines how our culture is defined by integrity. It provides a blueprint to guide our day-to-day decision making at ADI. Our Code describes our responsibilities under the law and our principles and expectations, but it does not provide detailed information about every specific rule we must follow.

We use this Code...as a resource when we have questions or need guidance about how to proceed ethically in a certain situation. When we need more detailed guidance, we consult ADI's other policies and guidelines, many of which are referenced and hyperlinked throughout this Code. We are all expected to follow the Code, and all other ADI policies and guidelines. If we have a question about whether something is ethical or compliant, we should seek guidance about the right thing to do before taking action and keep asking until guidance is obtained.

Our Code applies to...everyone who works for ADI and its subsidiaries. This includes the Chief Executive Officer; all Executive Officers; members of ADI's Board of Directors; other senior financial, business, and technical management; and every employee. In addition, independent contractors, consultants, and agents who provide services to ADI are expected to comply with this Code. We are all responsible for complying with this Code, ADI policies and guidelines, and applicable laws as we carry out our duties for ADI. 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.

We also expect our customers, suppliers, third-party sales representatives, distributors, consultants, and others engaged in business activities with ADI to comply with the law in the course of their relationship with ADI, including all applicable statutes, rules, and regulations in all countries and regions where we do business.

We will not approve any conduct in violation of this Code, nor will we issue waivers for violations of this Code.

We have many resources for you to consult if you have questions about the Code or need to report suspected or actual misconduct. We are counting on you to use the compliance resources, which are described and listed in detail throughout this document.

Interpretation of the Code

Nothing in this Code is intended to place any restriction on your rights as an employee or your ability to communicate with fellow employees and others about your working conditions or any of the other terms and conditions of your employment.

Our Code represents the strong values we uphold at our Company every day. Nothing contained within it should ever discourage any employee from coming forward with concerns or from cooperating in any investigation in any way. While we generally prefer to address matters internally when possible, ADI does not discourage you from reporting any illegal activity or any violation of law or regulation to the appropriate governmental authority.

We strive for continuous improvement in all aspects of our ethics and compliance program. Accordingly, ADI may modify this Code from time to time. The most current version of this Code can be found in the Compliance and Ethics area of Circuit.



Integrity Powers Culture



Mutual Respect and Non-Discrimination

At ADI, we are committed to driving a culture that values and leverages each employee's uniqueness and perspectives. We treat one another with respect and fairness. We strive to maintain a work environment free of harassment that values the dignity, safety and security of our employees. We do not discriminate in hiring, promotion, employee compensation or employment practices. ADI does not use forced, involuntary or child labor in any of our facilities and prohibits the use of child or forced labor in any forms throughout its supply chain.

CONTACT WITH QUESTIONS:
[Diversity and Inclusion Resources](#)

SEE ALSO:
[Anti-Harassment Policy](#),
[Social Media Guidelines](#)

LEARN. ADVANCE. TEACH.

ADI prohibits discrimination in all forms. Here are some examples of characteristics which laws require receive protection from discrimination:

- Race
- Color
- Religion
- Age
- Ancestry
- National origin
- Social or ethnic origin
- Sex
- Sexual orientation
- Gender, gender identity or expression
- Marital status
- Pregnancy and/or parental status
- Disability
- Medical condition
- Genetic information
- Military or veteran status
- Union membership
- Political affiliation

MAKE IT POSSIBLE:

- Be respectful, courteous, professional and kind at all times.
- Listen to one another and take advantage of different viewpoints, experiences, and perspectives.
- Be team focused and collaborative.
- Take ownership and responsibility.
- Act with honesty and integrity.
- Never act in a way that creates an unwelcoming or hostile place to work.
- Make all employment- and management-related decisions based on a person's experience, credentials and ability to do the best job.

MAKING CONNECTIONS: Between Mutual Respect and Our Culture

We communicate better when we show each other respect. This goes beyond how we treat one another face-to-face and includes how we interact with one another electronically — especially when using email, text messages, instant messaging, online chats or blogs, and when posting on social networking sites

Workplace Conditions and Natural Resources

At ADI, we conduct our business in compliance with all applicable laws, regulations and standards regarding workplace safety and environmental protection. We regard the safety and health of our employees, the encouragement of safety practices and the preservation of safe working conditions as being of paramount importance. We have safety regulations that are intended to ensure the wellbeing of all employees and to preserve ADI equipment and property. All of our employees share responsibility for safety and must comply with all safety-related policies and regulations as no job is considered to be so important or urgent that it can be done in an unsafe manner.

MAKE IT POSSIBLE:

- Understand and follow all ADI policies, procedures and guidelines regarding workplace safety and environmental protection that apply to your job.
- Keep in mind that our actions can impact those around us and that, when we act with the highest regard for safety, we protect one another.
- Report all observed unsafe or questionable conditions immediately to your local management.

MAKING CONNECTIONS: Between Caring for One Another and Our Culture

At ADI, we care about our coworkers, and we rely on each other to keep one another safe. We all have a responsibility to be aware of our surroundings and to report any activity that seems suspicious or unsettling. Here are some good safety practices to keep in mind:

- Wear your security badge when on Company property.
- Make sure to sign in visitors and guests.
- Understand all emergency preparedness and response procedures that apply to you, and participate in all required training to help keep yourself and those around you safe.
- Familiarize yourself with the emergency exit plans and procedures specific to your job location.

LEARN. ADVANCE. TEACH.

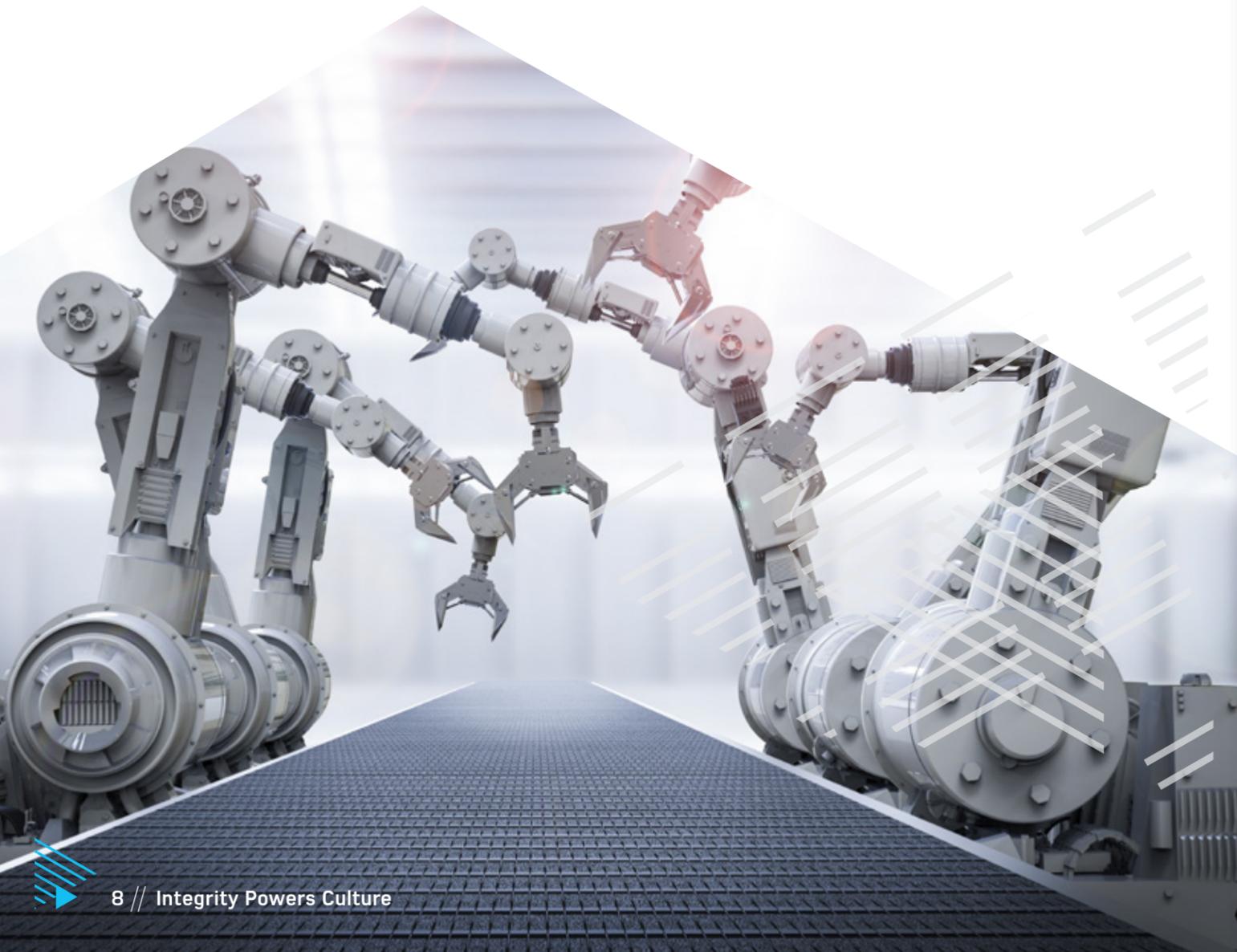
We share in a responsibility to protect and support our environment and the communities around us. Here are some ways you can promote our sustainability initiatives:

- Reduce waste and limit negative impacts on the environment.
- Give back to our communities when possible through support of community-based initiatives.

Corporate Social Responsibility

SEE ALSO:
[ADI's Code of Corporate Social Responsibility](#)

ADI strives to have a positive social impact, not only within our walls for our employees, but in our communities as well. This includes a commitment to operating in a way that delivers economic, social and environmental benefits for — and minimizes negative impacts on — all of our stakeholders. As employees of ADI, we ask you to help us continue to grow our support for our communities and the environment. Get involved in our communities and share ideas with us about how we can help make our world a better place.



Integrity Powers Fair Business Practices

Transparency and Fairness

We should deal fairly and honestly with ADI's suppliers, customers, competitors, and employees. We respect the confidentiality and privacy of our supplier and customers. Making false or misleading statements to sell or market ADI products or services is prohibited.

In the United States and many other countries, it is illegal for an organization to collaborate with its competitors or their representatives to restrain competition or trade by engaging in anti-competitive activities. Laws exist around the world to protect customers and safeguard fair competition in the marketplace. These laws can be complicated and can differ depending on where we are doing business. Accordingly, we do not discuss prices or customers with our competitors.

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[ADI Antitrust Best Practices](#)

LEARN. ADVANCE. TEACH.

Always deal fairly with our customers and distributors and refer to ADI Antitrust Best Practices for guidance:

- Do not fix or dictate retail prices.
- Do not pressure resale price maintenance.
- Do not try to prevent our distributors from selling our competitors' products.
- Do not offer price discounts to some distributors and not others.

MAKE IT POSSIBLE:

- Do not discuss processes, costs, productions, products, bidding or other non-public matters with competitors
- Avoid the following agreements with competitors:
 - Those which establish or maintain prices
 - Those which divide up markets or customers among one another
- Those which boycott other businesses
- Those which restrict production
- Those in which one or both parties refuse to do business with certain customers
- Take care when attending trade associations and professional groups to be sure that your conversations do not cross the line into illegal anti-competitive discussions.

MAKING CONNECTIONS:

Between Fair Competition and Fair Business Practices

Competition is part of business. We want to be the best, but we want to get there with integrity and fairness. Although it is helpful to learn information about our competitors, we must do it in a way that is fair and appropriate, through material that is publicly available. And we should never disparage or speak negatively about our competition. Our focus should always be to "sell what we've got."

Gifts and Entertainment

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[Gift and Entertainment Guidelines](#)

The exchange of gifts and business entertainment can be a part of everyday business practice when reasonable, appropriate and in accordance with applicable laws and regulations. At ADI, good judgment is at the foundation of this practice. We don't accept any gift or entertainment that may influence, or even appear to influence, our business decisions or judgment. Similarly, we do not offer or give gifts or business entertainment to our customers, competitors, suppliers or others doing business with ADI if the gift or entertainment may influence or appear to influence their business decisions or judgment.

LEARN. ADVANCE. TEACH.

What do we mean by gifts?

that may be considered "gifts" include both physical and nonphysical items of economic value and reimbursement of expenses.

What do we mean by business entertainment?

Items that may be considered "business entertainment" include meals, drinks, sporting or theatrical events, travel, accommodations and similar items.

MAKE IT POSSIBLE:

- Never give gifts to influence a business decision, and do not accept gifts if you think someone might be trying to influence you.
- Don't give gifts or anything of value to government officials and healthcare professionals without advanced written approval from the Ethics and Compliance team.
- Follow ADI's Gift and Entertainment Guidelines to determine acceptable market value for the gift or entertainment.
- Be sure that gifts are reasonable and customary in nature in the country and region and for the circumstance in which they are given.
- Avoid any gifts or entertainment that could reflect poorly on or be embarrassing to the Company.
- Don't give or accept cash or cash equivalents, such as debit cards, gift cards, or gifts that can be redeemed for cash.
- Record all payments made to government officials and healthcare professionals on expense reports, in accordance with ADI policy.
- Use your best judgment.

MAKING CONNECTIONS: Between Good Judgment and Fair Business Practices

When you think about whether or not to accept or offer a gift, the key is having good sense and using discretion. Would accepting or offering the gift make you feel at all uncomfortable? If so, avoid it. And remember that when it comes to gifts, the rules apply beyond just us. It would never be acceptable for someone to give a gift to — or do a favor for — one of your family members to try and sway your business decision or judgment, for example.

Here are some red flags to look out for:

- Gifts that come in the wake of a pending offer or negotiation
- Gifts with conditions attached or anything expected in return
- Gifts that are given frequently
- Gifts that may be perceived as a return commission, or kickback, directly to an employee for services carried out during a business relationship
- Offers of employment
- Special considerations, such as offering opportunities for job advancement or other preferential treatment

Anti-Bribery and Anti-Corruption

Bribery and corruption are simply not part of our culture at ADI. We are committed to compliance with all applicable anti-corruption and anti-bribery laws in all countries where we do business. We prohibit offering, giving, or receiving bribes in connection with work for ADI at any time for any reason. That means that you may not offer or accept, directly or indirectly, anything of value that may influence, or even appear to influence business decisions involving ADI, whether in the private or public sector.

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[ADI Policy on Interactions with Healthcare Professionals](#)
[ADI Sunshine Act Policy](#)

MAKE IT POSSIBLE:

- Understand the strict rules that apply when we deal with government officials and healthcare professionals and comply with these rules.
- Keep in mind that our guidelines might be stricter than local laws and comply with our guidelines at all times.
- Record all transactions and payments accurately and truthfully, and never conceal or attempt to conceal a payment.
- Seek guidance in advance if any question about appropriate conduct.
- Comply with all Company policies and procedures when hiring and working with third parties.

MAKING CONNECTIONS: Between Choosing the Right Partners and Fair Business Practices

Keep in mind that ADI is responsible not only for our own personnel, but also for our agents, contractors and other third parties acting on our behalf. Therefore, we expect our agents, contractors and third-party business partners to follow our policies and the law. Their actions can dictate how the public regards us.

LEARN. ADVANCE. TEACH.

- When we talk about "**anything of value**," we mean more than just cash. For example, anything of economic value could also include a promise or an offer of employment or even a charitable contribution.
- When we refer to "government officials," we mean officers and employees of all ranks, no matter how high or low, of any government, any department or agency of a government, any public international organization, or any person acting in an official capacity on behalf of any government. Government officials include those acting on behalf of any entity that is owned or controlled by the government or state, political parties, party officials, and candidates for public office and public international organizations.
- When we refer to "healthcare professionals," we mean any person in a position to prescribe, order, or purchase or influence the prescribing, ordering, or purchasing of a device, or any person or entity who may provide healthcare services or is connected with the provision of healthcare services, except salaried employees of ADI or a member of ADI's Board of Directors.



Integrity Powers Trust

Financial Reporting, Recordkeeping and Public Communications

As a Company, we have an obligation to make full, fair, accurate, timely and understandable disclosures in all reports and documents submitted to the United States Securities and Exchange Commission (SEC), as well as in other public communications. Those of us who are involved in creating, assembling and approving these reports and documents must make sure that the Company complies with these disclosure obligations.

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#),
Chief Accounting Officer or Corporate Contoller

SEE ALSO:
[Finance Control Manual](#)

LEARN. ADVANCE. TEACH.

If you receive a request for information from the media or the investment community and do not have specific authorization to speak with either of these groups, decline to comment and direct the requests as follows:

- Forward all requests from the media to the senior director of communications at employee.questions@analog.com.
- Forward all requests from market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers), ADI's investors or shareholders to the director of investor relations at investor@analog.com.

MAKE IT POSSIBLE:

- Make sure that your own records, time sheets and reports are honest and accurately reflect the true nature of the transactions they record.
- Ensure that all financial statements conform to generally accepted accounting rules and the Company's accounting policies.
- Do not establish an undisclosed or unrecorded account or fund for any purpose.
- Do not use or disperse corporate funds without detailed supporting documentation.
- Never create a false or misleading record and ensure all records are accurate and truthful.
- Comply create a false or misleading record and ensure all records are accurate and truthful.
- Operate with integrity during the course of any external or internal audit.
- Maintain Company records in accordance with ADI policies.
- Never coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of ADI's financial statements.
- Report coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of ADI's financial statements.

MAKING CONNECTIONS: Between Transparency and Trust

Between Transparency and Trust Our shareholders, customers and business partners make important decisions based upon the transparency and accuracy of our financial statements. In order to build and sustain trusted business partnerships, it is extremely important that we are transparent in our filings as well as in our public communications.

Conflicts of Interest

We must avoid any activity or personal interest in a transaction or relationship that creates or appears to create a conflict between our own private interests and ADI's interests. We also need to avoid interests, relationships or activities that might impair our ability to perform our ADI duties and responsibilities honestly, objectively and effectively.

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[ADI Conflict of Interest Review Request Form \(Employment or Board Service\)](#)

MAKE IT POSSIBLE:

- Never use ADI's property, information or business opportunities for your own personal gain or benefit, or that of anyone else
- Remember that managers may not have relatives (parents, grandparents, children, grandchildren, spouses, domestic partners, cohabitants, brothers, sisters, in-law and step relationships), persons with whom they reside, or romantic partners in their direct or indirect reporting line. If you face a situation that you believe may involve an actual or potential conflict of interest, report it to your manager and to ADI's Ethics and Compliance team.

MAKING CONNECTIONS: Between Conflict Disclosures and Trust

It is important to remember that, by disclosing an actual or potential conflict of interest, you are not necessarily excluding yourself from pursuing that opportunity. When you report a conflict or potential conflict, your manager, with the help of ADI's Chief Legal Officer if needed and in accordance with ADI's policy on conflict of interest outlined in this Code, will determine whether a conflict of interest exists and, if so, what must happen next. Often, we can develop a solution that works well for both parties.

LEARN. ADVANCE. TEACH.

This Code cannot list all possible conflicts of interest that you might face, but here are some examples of activities, relationships and interests that you need to avoid:

- Becoming involved (directly or indirectly) in any activity or business on behalf of an ADI competitor, unless ADI specifically requests that you do so
- Using your position at ADI to influence a transaction with a customer, supplier or other party in which you or a relative has any personal interest
- Investing in ADI customers or suppliers in any amount that would create a real or apparent conflict of interest
- Participating individually in any investment opportunity that you learned about through your position at ADI, as described in more detail in the Trading Stock section of this Code
- Participating in secondary employment or external activity if it takes away from your job responsibilities at ADI
- Outside business activities that competes with ADI or ADI's significant customers/business partners Outside business activity that diverts business opportunities and talent from ADI's business
- Election or appointment to public office or serving on a for-profit Board, unless written pre-approval from Ethics and Compliance team is obtained • Giving or accepting loans or guarantees to/ from another ADI employee or their immediate family, or any person or entity doing or seeking to do business with ADI.

Government Inquiries and Investigations

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)
[Investor Resources](#)

There may be times when government agencies or officials contact you regarding ADI's methods of doing business, regarding finances, products, facilities or parties with whom we do business. ADI strives to cooperate with any governmental inquiry or investigation, and we count on everyone at the Company to follow instructions from their managers, as well as the Ethics and Compliance team, in the event of any government inquiry or investigation.

LEARN. ADVANCE. TEACH.

Keep in mind that only certain individuals at ADI are authorized to speak about Company business with the media, investors and the public. Remember that you may not comment publicly on Company matters unless you have permission to do so. If you receive external inquiries:

- Contact the director of communications for media requests
- Contact the director of investor relations for requests from investors and analysts
- Contact the Chief Legal Officer for anything related to government or investigations.

MAKE IT POSSIBLE:

- Contact ADI's Ethics and Compliance team immediately if you receive information about an investigation or a request from any government agency or any notice of claim or legal proceeding against ADI.
- Notify ADI's Ethics and Compliance team if you are served with or asked to accept a subpoena or search warrant regarding ADI matters
- Never make any knowingly false, misleading or incomplete statement to a government agency or official, nor influence anyone else to do so
- Review the Circuit for directions about what to do if you are contacted by a government agency.
- Pay close attention to and comply with instructions from ADI's Ethics and Compliance team about retaining records associated with an investigation and never destroy, discard, tamper with, conceal or make a false entry on any documents (including electronic media or email) that could be relevant.

MAKING CONNECTIONS: Between Cooperation and Trust

We don't expect to be the subject of government investigations and inquiries, but we need to be prepared to handle them appropriately. If at any point we become the subject of an inquiry or investigation, our cooperation and willingness to work together to identify the truth reflects positively on our reputation as a trusted partner. The Ethics and Compliance team will review the matter and advise and assist in responding to all government inquiries and investigations. You should not respond to any investigation, audit, or legal claim or proceeding without involving ADI's Ethics and Compliance team. Contact the Ethics and Compliance Team immediately if you are:
Contact the Legal Department immediately if you are:

- Contacted by a representative of any government agency regarding an investigation or a request for information, documents, or assistance regarding ADI or our business
- Served with or asked to accept a subpoena or search warrant regarding ADI matters

Social Media Use

Social Media presents a great opportunity for you to share your knowledge, express your creativity and connect with others who share your interests. It can be a great advantage to the business. But we must demonstrate good judgment when using social media and remember our responsibilities to the Company and to ourselves.

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[Social Media Policy](#)

MAKE IT POSSIBLE:

- Be honest and upfront about who you are, and do not give the impression that your views are ADI's views.
- Protect ADI's confidential and proprietary information.
- Respect the privacy and confidential information of others.
- Do not harass or discriminate against other ADI employees.
- Be careful about connecting with people you don't know on social media.
- Never use your network password as your social media password.
- Be respectful and don't disparage others.
- Don't make any misleading remarks or false representations over social media.
- Don't geotag when posting about ADI events, as this could compromise physical security of our employees and our intellectual property.

MAKING CONNECTIONS: Between Common Sense and Trust

Online posting can create great opportunities to make connections and exchange ideas, but it is important to always act with common sense when using social media. Remember that information posted online can be viewed by millions of people. Also remember that people who know you work for ADI may associate your online activity with ADI. When we are thoughtful, respectful and professional in our presentation, we sustain our reputation as a trustworthy company.

LEARN. ADVANCE. TEACH.

Q: What do we mean by "social media"?

A: Social media consists of websites and applications that enable users to create and share information. It includes popular networking sites like Facebook, Twitter and LinkedIn, as well as media-sharing sites, such as YouTube, SlideShare, and Instagram. It involves blogging and forums and allows individuals the ability to share content and engage in conversations with other users.



Data Privacy

CONTACT WITH QUESTIONS:
[Data Privacy Resources](#)

SEE ALSO:
[Data Privacy Program Values](#)
[Privacy Policy](#)

During the course of our work, we may collect, store, share and process personal data about our employees, as well as other individuals who interact with ADI. We have a responsibility to protect personal data under our control and the privacy rights of individuals about whom we have personal data. ADI complies with applicable laws that govern the collection, storage and use of personal data across all jurisdictions in which we do business.

LEARN. ADVANCE. TEACH.

Q: What is “personally identifiable information” (PII)?

A: PII refers to information that can help identify an individual. For example, this can include a person’s name, phone number, email or home address. PII can also include things like employment history, government-issued identification numbers, age, ethnicity, and biometric or medical data.

MAKE IT POSSIBLE:

- Never disclose personally identifiable information (“PII”), whether it involves information about someone at ADI or includes information from customers, vendors, or consultants, unless you have explicit permission to do so.
- PII should be shared via secure methods such as web portals or secure applications, do not send PII via email unless you have followed the [appropriate encryption or password protection procedures](#).
- Collect and store PII only if it is relevant to your job.
- Only store PII in ADI approved applications/locations. If you are unsure if an application is approved for PII storage, email dataprivacy@analog.com.
- Use PII only as necessary to complete your job.
- Immediately report any actual or potential data breaches to the Data Privacy team at dataprivacy@analog.com.

MAKING CONNECTIONS: Between a Commitment to Data Privacy and Trust

ADI is committed to safeguarding PII and taking affirmative steps to protect against accidental or unlawful access, disclosure, loss or use of data. ADI is transparent about how we collect, use, and retain PII.

Data breaches damage brands and reputations. ADI is committed to promptly responding to and taking action to prevent data breaches. ADI is providing training to its employees about proper data handling and is committed to thoroughly vetting 3rd parties who handle PII on behalf of the Company.

Integrity Powers Responsibility

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[Intellectual Property Topics](#)

LEARN. ADVANCE. TEACH.

Q: What makes up our intellectual property?

A: Our intellectual property includes our patents, copyrights, trademarks, know how and trade secrets.

Intellectual Property

Our intellectual property enables us to grow our business every day. It’s important for each of us to learn how to recognize and protect ADI’s intellectual property (IP) at all times.

MAKE IT POSSIBLE:

- Always safeguard our intellectual property rights, including our patents and trade secrets.
- Seek guidance from your manager, colleagues, or IP Legal Team if you have questions about whether something might be intellectual property or how to handle intellectual property.

MAKING CONNECTIONS: Between Safeguarding Intellectual Property and Responsibility

We have an obligation to protect the trade secrets, personal information and other proprietary information of companies with whom we do business. This is simply the responsible thing to do.

- Never share information that we think could be proprietary or a trade secret,

whether it belongs to an ADI customer, supplier or other business partner, or an employee’s former employer.

- Comply with all agreements for intellectual property that we license from outside vendors, and use the intellectual property only as permitted under our licenses.

Confidentiality

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

ADI's success and future security as an organization depends on the confidentiality of information that is of strategic importance to us. That includes information concerning our research, development, marketing, sales, manufacturing, proprietary information and strategic activities. The protection of our customers' and our vendors' information is equally important to us.

LEARN. ADVANCE. TEACH.

Confidential information is a highly sensitive communication shared:

- With only a few people
- For a shared purpose
- That has limitations (inherent or explicit) on further sharing
- That cannot be used to take advantage of the information provider

What are some examples of confidential information at ADI?

- Strategic, business, marketing, financial, product roadmaps, and product plans
- Divisional and departmental sales, profits, and unpublished financial or pricing information
- Yields, designs, source code, efficiencies and capacities of ADI's production facilities, methods and systems
- Customer, employee and vendor lists
- Detailed information regarding customer requirements, preferences, business habits and plans
- Correspondence, printed matter, documents or records of any kind that describe specific product or process knowledge, procedures, special ADI ways of doing things, product development, etc.

MAKE IT POSSIBLE:

- Protect ADI's confidential information and proprietary information, and never misuse another person's or company's confidential or proprietary information.
- Do not transfer ADI's confidential information outside ADI's secured network without appropriate authorization.
- Use confidential information only for valid business purposes.
- Do not discuss ADI customers, vendors, plans or products in public or with people not employed by ADI.
- Safeguard all non-public customer information, including pricing policies and product specifications.
- Remember that your responsibility to protect the confidential information you learn through your work at ADI continues even if you no longer work for the Company. This includes a responsibility not to share confidential information, but also not to take with you any work, ideas, data, or other information that are proprietary information or property of ADI.
- Always keep in mind that this Code does not prohibit you from reporting illegal activity to, filing a charge with, or participating in an investigation or proceeding conducted by any governmental agency or entity or making a disclosure that is protected under the immunity provisions of the Defend Trade Secrets Act of 2016.

MAKING CONNECTIONS: Between Protecting Confidential Information and Responsibility

If we do not protect our confidential and proprietary information, it is vulnerable to theft or attack by hackers and other unauthorized parties. Improper disclosure of confidential information can also result in the violation of the securities laws. Follow these guidelines when handling confidential information:

- Do not disclose to the public material, nonpublic information about ADI's business, products, plans or finances even if the intent of the disclosure is to correct inaccurate statements or to defend ADI, unless a non-disclosure agreement is in place.

- Never use confidential information for your own benefit or for the profit or benefit of individuals or organizations outside ADI.
- Disclose confidential information only to other ADI employees on a "need to know" or "need to use" basis and make the employees aware of the sensitive nature of the information.
- Contact our Ethics and Compliance team if you have questions about confidential information.

Use of Assets

We are all responsible for protecting ADI's corporate assets and for preventing them from damage, theft or abuse. This responsibility includes our need to safeguard physical assets as well as our informational assets, financial assets and technology and communication systems.

CONTACT WITH QUESTIONS:
[Ethics and Compliance Resources](#)

SEE ALSO:
[Technology Resources Policy](#)

MAKE IT POSSIBLE:

- Spend Company funds only as approved for business purposes and not for personal expenses.
- Use the Company's technology and communication systems (such as email and voicemail) responsibly, appropriately and primarily for business purposes.
- Do not remove, dispose of, or destroy anything of value belonging to the Company without the Company's consent, including physical or electronic information
- Keep technology devices, including mobile phones and laptops, as secure as possible.

MAKING CONNECTIONS: Between Smart Use of Assets and Responsibility

Be aware that any information you create, send, receive, download or store on our systems becomes ADI property.

LEARN. ADVANCE. TEACH.

Here are some things you can do to take care of our technology resources:

- Create and use safe passwords in accordance with Company policy.
- Do not store Company information on mobile devices that are not approved by ADI for work use.
- Do not leave laptops or mobile devices unlocked or unattended in public.



Trading Stock

CONTACT WITH QUESTIONS:
[Legal Resources](#)

SEE ALSO:
[Insider Trading Policy](#)

Occasionally, we learn important information about ADI that is not yet known to the investing public. We comply with all laws that govern insider trading and never trade in the stocks or securities of ADI or provide tips to trade based on material, nonpublic information.

LEARN. ADVANCE. TEACH.

What is material, nonpublic information?

Material, nonpublic information is any information not yet known to the public that could impact the price of a company's stock. Some examples include:

- Bookings levels
- Prospects for sales or profit-ability
- Acquisitions
- New product development
- Specific technological achievements

Contact ADI's General Counsel if you have any questions about whether or not information is material to ADI or another company, or whether the information has been released to the public.

MAKE IT POSSIBLE:

- Do not buy or sell ADI's stock until after the material information has been released to the public.
- Do not disclose material information to others, who might use it to their advantage in buying or selling ADI stock, until after it has been released to the public.

MAKING CONNECTIONS: Between Understanding Insider Trading Rules and Responsibility

While working for ADI, we might also learn material, nonpublic information about another company. Remember that the insider trading rules apply to other companies' stock as well. If, in the course of your job, you learn of material, nonpublic information about another company, you may not trade that company's stock, nor may you disclose the information to anyone else. And the same rules apply to your relatives if they learn about material, nonpublic information as a result of your work for ADI.

International Trade

At ADI, we recognize the importance of trade controls to national security, foreign policy and economic competitiveness. We must comply with many controls and regulations whenever we move goods, services and technologies across country borders. We take trade compliance responsibilities seriously and have policies and controls in place to make sure that we comply with all relevant trade control laws, rules and regulations. These include the International Traffic in Arms Regulations (ITAR), the U.S. Export Administration Regulations (EAR) and the export and import laws of all countries in which ADI does business.

CONTACT WITH QUESTIONS:
[Export Compliance Department](#)

SEE ALSO:
[Export Compliance Policies and Procedures](#)

MAKE IT POSSIBLE:

- Understand how trade controls, such as import and export laws, apply to your job responsibilities.
- Be clear and precise when you describe our products to customs authorities.
- Make sure you have the appropriate licenses before you receive or ship a product.
- Never agree to participate in a boycott or refuse to deal with a certain customer and report any request to participate in a boycott to one of your compliance resources immediately.
- Understand how export controls impact technology exchanges you have on ADI customer portals such as EngineerZone.
- Look out for red flags, which may signal problems or potential problems with imports or exports.
- Check if there are export license requirements prior to engaging in collaborations involving ADI employees of different nationalities.

MAKING CONNECTIONS: Between Trade Compliance and Responsibility

Remember, just as we are responsible for complying with export laws and other trade compliance regulations, the same is true for our customers, suppliers and all of our other business partners. If you become aware of or suspect any trade violation, you must report it to ADI's Export Compliance Department.

LEARN. ADVANCE. TEACH.

If your work for ADI includes exporting goods, technology and/or services, you are expected to be aware of export control laws and the red flags that could indicate violations of international trade laws. Here are some examples:

- Cash sales that would normally include financing terms
- Vague contract details, including delivery dates and destinations
- Lack of address details (PO Box only)
- No website provided
- Declining typical installation, training or on- going services
- Requests from customers to change typically standard terms or a last-minute change to the shipping address
- Refusal to identify intended end use or being purposely vague
- Orders for products that don't appear compatible with the technology in the destination where the product is shipped or the identified application



Conclusion: Integrity Powers Courage

Having integrity means having the courage to raise questions if you have them and to report concerns if something does not feel right. At ADI, we are committed to creating an environment where every employee is respected and valued. We have an open-door policy and rely on our employees to speak up. We don't anticipate misconduct, but we need to know if something goes wrong so we can immediately begin taking steps to correct it. You should reach out with questions and concerns related to:

- This Code, ADI Code of Corporate Social Responsibility (collectively "ADI Codes"), company policies and guidelines
- Any awareness you have of violations or potential violations of our company policies or guidelines, or applicable laws
- Questionable accounting or auditing matters or internal financial controls

To enable our Company to continue to grow and thrive, we are all responsible for working together to preserve our reputation as a trusted business partner — as a company with integrity.

How to Make a Report

If you need to ask question or make a report, you can start with the following resources:

- Your supervisor
- The Human Resources Department
- ADI's Chief Legal Officer
- ADI's Ethics Hotline (online at analog.ethicspoint.com or by phone by calling country specific toll free number), which is operated by an independent third party and allows anonymous reporting where permitted by law
- ADI's Ethics Email Box

While we prefer that you identify yourself when reporting, you may remain anonymous and can do so where permitted by law. You will find more information about the Ethics Hotline and Ethics Email Box in the [Compliance and Ethics area of the Circuit](#).

After the Report

ADI is committed to applying a consistent and objective review process to ensure reports are fairly and promptly reviewed. If an investigation is warranted, ADI will promptly investigate allegations and implement corrective actions, if appropriate, and convey the outcome of the investigation to the reporter.

All efforts will be made to handle the investigation confidentially, consistent with business needs and applicable law. At ADI, we must all cooperate fully with internal and external investigations.

ADI's Chief Legal Officer is responsible for tracking and responding to issues that arise under this Code and actual or potential violations of this Code. The process for reviewing suspected violations of this Code is as follows:

- ADI's Ethics and Compliance team evaluates the allegations and determines whether further investigation is required.
- If an investigation is required, a neutral investigator is assigned to review the allegations.
- Relevant information is collected regarding to the allegations, which may include review of documents and interviewing individuals with information.
- An outcome is reached and communicated to the reporter and respondent; and
- Corrective action(s) are implemented, if appropriate.

If the concern or complaint involves questionable accounting or auditing matters or internal financial controls, the Chief Legal Officer, Chief Financial Officer or ADI's internal auditor will report to the Audit Committee of ADI's Board of Directors the allegations, investigation, and outcome. Additionally, the Chief Legal Officer will report any recommendation for follow-up action to the appropriate executive officer or, if the alleged violation involves an executive officer or a member of the Board of Directors, to the Board of Directors. The Board or management team will decide upon and carry out a course of action to address the situation.

No Retaliation

ADI will not retaliate against anyone who in good faith makes a report or assists ADI in identifying or investigating suspected violations of the law or this Code. By raising concerns to the Company, you are doing what you can to help us sustain our culture of integrity and protect ADI. Additionally, ADI will take proactive steps to prevent retaliation at the Company.



VISIT ANALOG.COM

 **ANALOG
DEVICES**
AHEAD OF WHAT'S POSSIBLE™