

ANALOG DEVICES, INC.

ANTI-CORRUPTION POLICY

The Policy

Our Anti-Corruption Policy is simple: **no one may offer, give, or receive bribes in connection with their work for Analog Devices (ADI) at any time for any reason.** This means that no one may offer or accept, directly or indirectly, *anything of value* that may influence, or even appear to influence, business decisions involving Analog Devices, whether in the private or public sector.

Anything of Value. Broadly construed by regulatory authorities and, for purposes of this Policy, can include anything the recipient would find interesting or useful and is not limited to tangible items or economic value. Anything of value includes, but is not limited to:

- Cash,
- Cash equivalents (gift cards, etc.)
- Gifts,
- Entertainment, meals and travel,
- Training,
- Business, employment or investment opportunities,
- Personal discounts or credits,
- Assistance to or support of family members and other benefits,
- Payment of medical expenses,
- Political contributions,
- Charitable contributions,
- Job offers.

No one should ever ask anyone else to engage in bribery on ADI's behalf. We expect all third parties that do business with ADI to understand and comply with this Policy and with all applicable anti-corruption and anti-bribery laws.

Employees confronted with a request or demand to pay a bribe or are offered a kickback must refuse. Explain to the third party that these types of payments are illegal and are against ADI's Code of Business Conduct and Ethics.

Facilitation Payments

Facilitation payments (sometimes called "grease" payments) are a type of bribe made to a government employee to expedite or secure performance of a routine, non-discretionary action, such as obtaining utility services, clearing customs, or getting a permit. Facilitation payments are strictly prohibited by this policy and ADI's [Code of Business Conduct and Ethics](#).

Accurate Recordkeeping

All expenses, including gifts, business entertainment, and travel, must be accurately recorded in ADI's books and records. Expenditures must be fully and accurately described in all business documentation and paid directly to the vendor of the services.

Scope and Penalties

This Policy applies to all ADI employees, including directors, officers, and managers. This policy also applies to third parties, including (1) agents; (2) consultants; (3) sales representatives; (4)

vendors; (5) suppliers; (6) and any other representatives who conduct business on ADI's behalf. Failure to comply with this Policy may result in civil and criminal penalties for both ADI and for the individuals involved, and is grounds for disciplinary action, up to and including termination. Any employee who engages a third party to act on ADI's behalf must ensure that appropriate diligence has been conducted and appropriate contractual commitments have been made with that third party. Any questions regarding the appropriate steps to take in engaging a third party should be directed to the Legal Department.

Where to Get More Information

If you have any questions, you should contact your supervisor or the Legal Department. Further information can be found in ADI's [Code of Business Conduct and Ethics](#). In addition, guidelines regarding gifts, business entertainment and travel expenses can be found in the [Guidelines for Gifts and Business Entertainment](#). The payment of travel expenses must also comply with our [Travel and Entertainment Policy](#).

Investigating and Reporting Violations of this Policy

Employees, officers, and members of our Board of Directors are expected to cooperate fully with any investigation involving a suspected violation of this Policy.

You should raise any concerns or suspected violations of this Policy with your supervisor or with ADI's Legal Department. You may also report any issues by calling the toll-free Business Ethics Hotline or through the Ethics Email Box. Callers in the United States, Canada, and U.S. territories can reach the hotline by dialing 1-800-381-6302. All other callers should dial their country-specific AT&T direct access code, which can be found at this website; once you are connected with AT&T, you will then be prompted to dial the hotline number, 800-381-6302. Callers in China should dial 4008811475. Before calling the hotline or submitting an email, European employees should please read the [Guidelines for European Economic Area Residents](#).

ADI will not discipline, discriminate against, or retaliate against any employee who, in good faith, reports violations or suspected violations of this Policy.

November 2018