Anti-Harassment Policy

Policy Statement

At ADI, we are committed to driving a culture of inclusion that values and leverages each employee's uniqueness and perspectives. We expect that managers and employees alike maintain a respectful work environment that is free from harassment and discrimination, and we strive to provide a professional atmosphere that promotes equal opportunity and prohibits discriminatory practices.

Harassment is Prohibited

ADI prohibits sexual harassment and harassment against any of its employees based on race, color, religion, pregnancy (including lactation, childbirth or related medical conditions) and or parental status, sex, sexual orientation, gender, gender identity or expression, marital status, age (40 and over), national origin or ancestry, social or ethnic origin, physical or mental disability, medical condition, genetic information (including testing and characteristics), union membership, political affiliation, military or veteran status, uniformed service member status or any other status protected by federal, state or local law.

ADI's anti-harassment policy applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by supervisors, managers, and nonsupervisory employees. This policy also protects employees from prohibited harassment by third parties, such as customers or vendors.

Sexual Harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favors or visual, verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the types of conduct prohibited by this policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances (including repeated and unwelcome requests for dates);
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages;
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress, whistling or making suggestive or insulting sounds;
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;
- Physical conduct: touching, assault or impeding or blocking normal movements;
- Retaliation for making reports or threatening to report sexual harassment.

Other Types of Harassment

Harassment includes wide range of behaviors relating to an individual's protected status that is of an offensive nature, such as intimidation, direct insults, malicious gossip, victimization and any other behavior that demeans, humiliates or embarrasses a person. When these behaviors become repetitive, it may be defined as bullying. Harassing behavior includes, but is not limited to:

- *Verbal conduct:* taunts, jokes, threats, epithets, derogatory comments or slurs based on an individual's protected status;
- *Visual and/or written conduct:* derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages or gestures based on an individual's protected status;
- *Physical conduct:* assault, unwanted touching or blocking normal movement because of an individual's protected status.

Protection Against Retaliation

Retaliation is prohibited against any person, by another employee or by ADI, for using ADI's complaint procedure, reporting harassment, objecting to such conduct, or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by ADI or a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit.

Manager's Responsibility

All supervisors and managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation;
- Ensuring that all employees under their supervision have knowledge of and understand this policy;
- Promptly reporting any complaints to the designated compliance resources so they may be investigated and resolved in timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination.

Complaint Procedure

ADI encourages any employee, job applicant or contractor who believes they have been harassed, have witnessed harassment, or who believes they have been retaliated against, to report all incidents of harassment and/or retaliation regardless of the identity of the offender. ADI also encourages individuals who believe they are being harassed to firmly and promptly notify the offender that his or her behavior is unwelcome if they are comfortable taking such action. However, because this may be difficult, such direct communication is not a requirement of filing a report or complaint. An employee, job applicant or contractor who believes that he or she has been harassed or retaliated against by any employee, contractor, vendor, customer, or other business contact of ADI shall report the incident to one of the following compliance resources:

- The employee's supervisor
- The Human Resources Department
- ADI's Chief Legal Officer
- ADI's Ethics Hotline (online or by phone), which allows for anonymous reporting
- <u>ADI's Ethics Email Box</u> : <u>ethics.compliance@analog.com</u>

These resources are also available if reporter wants to discuss any concerns he or she may have and to provide information to the reporter about ADI's policy against harassment/retaliation and ADI's complaint process.

Allegations of harassment or retaliation under this policy will be investigated in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable and appropriate under the circumstances, however, ADI cannot guarantee that the identity of the person lodging the complaint or that the allegations will be kept confidential. All employees, contractors, and supervisors have a duty to cooperate in ADI's investigation of the alleged harassment or retaliation.

If it is determined that inappropriate conduct has been engaged in by one of ADI's employees or contractors, ADI will act promptly to eliminate the offending conduct, and where it is appropriate ADI will also impose disciplinary action. Such disciplinary action may range from counseling to termination of employment and may include other forms of disciplinary action as ADI deems appropriate under the circumstances. Although ADI's ability to discipline a non-employee harasser (such as a customer, contractor, vendor, or supplier) is limited by the degree of control, if any, that the Company has over that individual, ADI will take reasonable and appropriate action to protect its employees from harassing or retaliatory conduct.

Federal and State Agencies

In addition to the internal complaint process, if you believe you have been subjected to harassment or retaliation, you may file a formal complaint with the applicable federal or state agencies identified below. Using ADI's complaint process does not prohibit you from filing a complaint with these agencies.

<u>Contacts for State and Federal</u> Agencies

ALABAMA

U.S. Equal Employment Opportunity Commission (EEOC) Birmingham District Office 1130 22nd Street, Suite 2000 Birmingham, AL 35205 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 180 days of the incident giving rise to the claim. Alabama State Fair Employment Practices Agency (FEPA)

50 N. Ripley Street Montgomery, AL 36130 Phone (334) 242-1550

ARIZONA

U.S. Equal Employment Opportunity Commission (EEOC) Phoenix District Office 3300 N. Central Avenue, Suite 690 Phoenix, AZ 85012-1848 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Arizona Civil Rights Division (Phoenix) FEPA

1275 W. Washington Phoenix, AZ 85007 Phone: (602) 542-5263 TTY: (602) 542-5002 Filing period is within 180 days of the incident giving rise to the claim.

CALIFORNIA

The United States Equal Employment Opportunity Commission (EEOC) 96 North 3rd St., Suite 250 San Jose, CA 95112 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim

The California Dept. of Fair Employment and

Housing (FEPA)

2014 T St. Suite 210 Sacramento, CA 95814 Phone: 916-227-2878 TTY: 800-700-2320 Filing period is 365 or 90 days after learning of the violation, whichever is later.

COLORADO

U.S. Equal Employment Opportunity Commission (EEOC) Denver District Office 303 E. 17th Avenue, Suite 410 Denver, CO 80203 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim

Colorado State Agency

Colorado Civil Rights Division 1560 Broadway, Suite 1050 Denver, CO 80202 Phone: (303) 894-2997 Fax: (303) 894-7830 Toll-Free: (800) 262-4845 Filing period is within 180 days of the incident giving rise to the claim. CONNECTICUT

The United States Equal Employment **Opportunity Commission (EEOC)** The Boston, MA Office of the EEOC has jurisdiction over federally filed employment discrimination charges filed in Connecticut. John F. Kennedy Federal Bldg. 475 Government Center Boston, MA 02203 Phone: (800) 669-4000 TTY: (617) 565-3204 Filing period is within 300 days of the incident giving rise to the claim **Connecticut Commission on Human Rights** and Opportunities (FEPA) 21 Grand Street Hartford, CT 06106 Phone: 860-541-3400 Fax: 800-477-5737 TTY: 860-541-3459 Filing Period is within 180 days of the incident giving rise to the claim.

FLORIDA

U.S. Equal Employment Opportunity Commission (EEOC) Tampa Area Office 501 East Polk Street, Suite 1000 Tampa, FL 33602 Phone: (813) 228-2310 TTY: (813) 228-2003 Filing period is within 300 days of the incident giving rise to the claim. Florida Commission on Human Relations (FEPA) 2009 Apalachee Parkway Suite 100 Tallahassee, FL 32301 Phone: (850) 488-7082 TTY: (800) 955-8771

Filing period is within 365 days of the incident giving rise to the claim

GEORGIA

U.S. Equal Employment Opportunity Commission (EEOC) Atlanta District Office 100 Alabama Street, Suite 4R30 Atlanta, GA 30303 Phone: (800) 669-4000 TTY: (800) 669-6820

Filing period is within 300 days of the incident giving rise to the claim.

Georgia Commission on Equal Opportunity

(FEPA) Suite 1002-West Tower 2 martin Luther king Jr. Drive Atlanta, GA 30334 Phone: (404) 656-1736 Fax: (404) 656-4399 TTY: (404) 656-9295 Filing period is within 180 days of the incident giving rise to the claim IDAHO

U.S. Equal Employment Opportunity Commission (EEOC)

Federal Office Building 909 First Avenue, Suite 400 Seattle, WA 98104-1061 Phone: 1-800-669-4000 Fax: 206-220-6911 Filing period is within 300 days of the incident giving rise to the claim.

Idaho Human Rights Commission (FEPA)

Owyhee Plaza 1109 W Main Street, Suite 400 P.O. Box 83720 Boise, ID 83720-0040 Phone: 208-334-2873 Fax: 208-334-2664 Filing period is within 365 days of the incident giving rise to the claim.

ILLINOIS

U.S. Equal Employment Opportunity Commission (EEOC) Chicago District Office 500 West Madison Street, Suite 2800 Chicago, IL 60661 Phone: (800) 669-4000 Fax: (312) 886-1168 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Illinois State Agency

Chicago Office Illinois Department of Human Rights (FEPA) 100 West Randolph Street, Suite 10-100 Chicago, IL 60601 Phone: (312) 814-6200 Fax: (312) 814-1436 Filing period is within 180 days of the incident giving rise to the claim.

INDIANA

U.S. Equal Employment Opportunity Commission (EEOC) 101 West Ohio St., Ste. 1900 Indianapolis, IN 46204 Phone: (800) 669-4000 FAX: (317) 226-7953 TTY: (800) 669-6820 Filing Period is within 300 days of the incident giving rise to the claim

Indiana Civil Rights

Commission (FEPA) Indiana Government Center- North 100 N Senate Ave. Rm N103 Indianapolis, IN 46204 Phone: 317-232-2600 Fax: 317-232-6580 Filing Period is within 180 days of the incident giving rise to the claim.

KANSAS

The St. Louis, MO District Office of the EEOC has jurisdiction over federally filed employment discrimination charges filed in Kansas.

The United States Equal Employment Opportunity Commission (EEOC)

Robert A. Young Federal Bldg. 1222 Spruce Street, Rm 8.100 St. Louis, MO 63103 Phone: 1-800-669-4000 Fax: (314) 539-7894 Filing period is within 300 days of the incident giving rise to the claim.

Kansas Human Rights

Commission (FEPA) 900 Southwest Jackson St., Suite 851-S Topeka, Kansas 66612-1258 Phone: (785) 296-3206 Fax: (785) 296-0589

Filing period is within six (6) months of the incident giving rise to the claim.

KENTUCKY

U.S. Equal Employment Opportunity Commission (EEOC) 600 Dr. Martin Luther King, Jr. Place, Suite 268 Louisville, Kentucky 40202 Phone: 1-800-669-4000 Fax: 502-582-5895 Filing period is within 300 days of the incident giving rise to the claim.

Kentucky Commission on Human Rights (FEPA)

The Heyburn Bldg, 7th Floor 332 West Broadway Louisville, Kentucky 40202 Phone: 502-595-4024 Fax: 502-595-4801 TTY: 502-595-4084 Filing period is within 180 days of the incident giving rise to the claim.

MARYLAND

U.S. Equal Employment Opportunity Commission (EEOC) Baltimore Field Office City Crescent Building 10 S. Howard St., 3rd Floor Baltimore, MD 21201 Phone: (866) 408-8075 Fax: (410) 962-4270 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim. Filing period is 300 days.

Maryland Commission on

Human Relations William Donald Schaefer Tower 6 Saint Paul Street, Suite 900 Baltimore, MD 21202 Phone: (410) 767-8600 Fax: (410) 333-1841 TTY: (410) 333-1737 Toll-Free: (800) 637-6247 Filing period is 180 days of the incident giving rise to the claim.

MASSACHUSETTS

The United States Equal Employment Opportunity Commission (EEOC) John F. Kennedy Federal Bldg. 475 Government Center Boston, MA 02203 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

The Massachusetts Commission Against

Discrimination (FEPA) One Ashburton Place Sixth Floor, Room 601 Boston, MA 02108 Phone: (617) 727-3990 TTY: (617) 720-6054 Filing period is within 300 days of the incident giving rise to the claim. MICHIGAN

U.S. Equal Employment Opportunity Commission (EEOC) Patrick V. McNamara Bldg. 477 Michigan Ave, Room 865 Detroit, MI 48226 Phone: (800) 669-4000 FAX: (313) 226-4610 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Michigan Department of

Civil Rights (FEPA) Detroit Civil Rights Office Cadillac Place 3054 West Grand Boulevard Suite 3-600 Detroit, Michigan 48226 Phone: 313-456-3700 Fax: 313-456-3701 TTY: 877-878-8464 Filing period is within 180 days of the incident giving rise to the claim

MINNESOTA

U.S. Equal Employment Opportunity Commission (EEOC) Towle Building 330 South Second Avenue, Suite 720 Minneapolis, MN 55401-2224 Phone: 1-800-669-4000

Fax: 612-335-4044 Filing period is within 300 days of the incident giving rise to the claim.

Minnesota Department of

Human Rights (FEPA) Sibley Square at Mears Park 190 East 5th Street, Suite 700 St. Paul MN 55101 Phone: 1-800-657-3704 Fax: 651-296-9064 TTY: 651-296-1283 Filing period is within 365 days of the incident giving rise to the claim.

MISSOURI

U.S. Equal Employment Opportunity Commission (EEOC) Robert A. Young Federal Bldg. 1222 Spruce Street, Rm 8.100 St. Louis, MO 63103 Phone: 1-800-669-4000 Fax: (314) 539-7894 Filing period is within 300 days of the incident giving rise to the claim. Missouri Commission on Human Rights (Main Office) (FEPA) PO Box 1129 3315 West Truman Boulevard Jefferson City, MO 65102-1129 Phone: (573)751-3325/Fax: (573)751-2905 Filing period is within 180 days of the incident giving rise to the claim.

NEW HAMPSHIRE

U.S. Equal Employment Opportunity Commission (EEOC) The Boston, MA Office of the EEOC has jurisdiction over federally filed employment discrimination charges filed in New Hampshire.

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Bldg. 475 Government Center Boston, MA 02203 Phone: (617) 565-3200 TTY: (617) 565-3204 Filing period is within 300 days of the incident giving rise to the claim.

New Hampshire Commission for Human Rights

2 Chenell Drive Concord, NH 03301-8501 Phone: (603) 271-2767 Fax: (603) 271-6339 TTY: 1-800-735-2964 Filing period is within 180 days of the incident giving rise to the claim.

NEW JERSEY

U.S. Equal Employment Opportunity Commission (EEOC) Newark Area Office 1 Newark Center, 21st Floor Raymond Blvd at

McCarter Hwy (Rt.21) Newark, NJ 07102-5233 Phone: (800) 669-4000 Fax: (973) 645-4524 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

New Jersey Division on

Civil Rights 31 Clinton Street 3rd Floor Newark, NJ 07102 Phone: (973) 648-2700 Fax: (973) 468-4405 Filing period is within 180 days of the incident giving rise to the claim.

NEW YORK

U.S. Equal Employment Opportunity Commission (EEOC) 33 Whitehall Street, 5th Floor New York, NY 10004 Phone: (212) 336-3620 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

New York State Division of Human Rights (FEPA)

One Fordham Plaza, 4th Floor New York, NY 10458 Phone: 718-741-8400 Fax: 718-741-3214 TTY: 718-741-8304 Filing period is within 365 days of the incident giving rise to the claim

NORTH CAROLINA

The United States Equal Employment Opportunity Commission (EEOC) Suite 201 2303 W. Meadowview Road, Greensboro, NC 27407 Phone: 336-547-4188 TTY: 336-333-5542 Filing period is within 180 days of the incident giving rise to the claim.

OHIO

The United States Equal Employment Opportunity Commission (EEOC) John W. Peck Federal

Building 550 Main Street, 10th Floor Cincinnati, OH 45202 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Ohio Civil Rights

Commission (FEPA) 801B W. Eighth Street Holiday Park East, Suite 200 Cincinnati, OH 45203 Phone: (513) 852-3344 Filing period is within six (6) months of the incident giving rise to the claim.

OREGON

U.S. Equal Employment Opportunity Commission (EEOC)

The Seattle, WA District Office has jurisdiction over federally filed employment discrimination charges filed in Oregon. Seattle District Office Federal Office Building 909 First Avenue, Suite 400 Seattle, WA 98104-1061 Phone: (800) 669-4000 TTY: (800) 669-6820 Filing period is within 300

days of the incident giving rise to the claim.

Oregon Bureau of Labor and

Industries (FEPA) Portland Office Bureau of Labor and Industries Civil Rights Division Building 800 NE Oregon Street, MS#32 Suite 1070 Portland, OR 97232 Phone: (503) 731-4874 Fax: (503) 731-4874 Fax: (503) 731-4069 TTY: (503) 731-4106 Filing period is within one (1) year of the incident giving rise to the claim.

PENNSYLVANIA

U.S. Equal Employment Opportunity Commission (EEOC) Philadelphia District Office 801 Market Street, Suite 1300 Philadelphia, PA 19107-3127 Phone: (800) 669-4000 FAX: (215) 440-2632 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Pennsylvania Human

Relations Commission 110 North 8th Street, Suite 501 Philadelphia, PA 19107 Phone: (215) 560-2496 TTY: (800) 669-6820 Filing period is within 180 days of the incident giving rise to the claim.

TENNESSEE

U.S. Equal Employment Opportunity Commission (EEOC) 1407 Union Ave., 9th Floor Memphis, TN 38104 Phone: 1-800-669-4000 Fax: 901-544-0111 Filing period is within 300 days of the incident giving rise to the claim.

Tennessee Human Rights

Comm. (FEPA) Andrew Johnson Tower, 1st Floor 710 James Robertson Parkway , Suite 100Nashville, TN 37243 Phone: 615-741-5825 Fax: 615-532-2197 Filing period is within 180 days of the incident giving rise to the claim.

TEXAS

U.S. Equal Employment Opportunity Commission (EEOC) Dallas District Office 207 S. Houston Street, 3rd Floor Dallas, Texas 75202 Phone: (800) 669-4000 Fax: (214) 253-2720 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Texas Workforce

Commission (FEPA) 1117 Trinity Street, Rm 144T Austin, Texas 78778 Phone: (888) 452-4778 Filing period is within 180 days of the incident giving rise to the claim.

UTAH

U.S. Equal Employment Opportunity Commission (EEOC)

The Phoenix, AZ Office of the EEOC has jurisdiction over federally filed employment discrimination charges filed in Utah. Phoenix District Office 3300 N. Central Avenue, Suite 690 Phoenix, AZ 85012-1848 Phone: (602) 640-5000 TTY: (602) 640-5072 Filing period is within 300 days of the incident giving rise to the claim.

Labor Commission of Utah Antidiscrimination and Labor Division 160 East 300 South, 3rd Floor P.O. Box 146630 Salt Lake City, UT 8411 Phone: (801) 530-6801 Fax: (801) 530-7609 Toll-Free: (800) 222-1238 TTY: (801) 530-7685 Filing period is within 180 days of the incident giving rise to the claim.

VERMONT

U.S. Equal Employment Opportunity Commission (EEOC)

The Boston, MA Office of the EEOC has jurisdiction over federally filed employment discrimination charges filed in Vermont. John F. Kennedy Federal Bldg. 475 Government Center Boston, MA 02203 Phone: 1-800-669-4000 Fax: 617-565-3196 Filing period is within 300 days of the incident giving rise to the claim.

Vermont Attorney General's Office -Public Protection Division Civil Rights Unit (FEPA)

109 State Street Montpelier, VT 05609-1001 Phone: 802-828-5511 Filing period is within 300 days of the incident giving rise to the claim.

VIRGINIA

U.S. Equal Employment Opportunity Commission (EEOC) 400 N. Eight Street Suite 350 Richmond, VA 23219 Phone: (800) 669-4000 Fax: (804) 771-2222 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim.

Virginia Council on Human Rights (FEPA)

1100 Bank Street, Washington Building, 12th Floor Richmond, VA 23219 Phone: 804-225-2292/Fax: 804-225-3294 TTY: 1-800-633-5510

WASHINGTON

U.S. Equal Employment Opportunity **Commission (EEOC)** Seattle District Office Federal Office Building 909 First Avenue, Suite 400 Seattle, WA 98104-1061 Phone: (800) 669-4000 Fax: (206 220-6911 TTY: (800) 669-6820 Filing period is within 300 days of the incident giving rise to the claim. Washington State Human **Rights Commission (FEPA)** 711 South Capitol Way, Suite 402 P.O. Box 42490 Olympia, WA 98504-2490 Phone: (360) 753-6770 TTY: (800) 300-7525 Filing period is within 180 days of the incident giving rise to the claim.

WISCONSIN

U.S. Equal Employment Opportunity **Commission (EEOC) Reuss Federal Plaza** 310 West Wisconsin Ave., Suite 500 Milwaukee, WI 53203-2292 Phone: (414) 297-1111/ TTY: (414) 297-1115 FAX: (414) 297-4133 Filing period is within 300 days of the incident giving rise to the claim. **Wisconsin Equal Rights Division - Milwaukee** (FEPA) 819 N. Sixth St, Room 255 Milwaukee WI 53203 Phone: 414-227-4384 Fax: 414-227-4084 TTY: 414-227-4081 Filing period is within 300 days of the incident giving rise to the claim