Integrity Powers Growth
ADI: Code of Business Conduct and Ethics
Analog Devices has a long history of excellence in our products and customer partnerships, but also in our business practices and the caliber of our people. Our agility and responsiveness to customer and market needs is matched with a commitment to do so responsibly and with integrity. That ethical consistency has enabled us to build a strong foundation of trust with our customers, and trust is the necessary precursor of any successful business partnership.

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, President and CEO
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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 have specific questions and need more detailed guidance, we consult ADI’s other policies and guidelines, which are referenced and hyperlinked throughout this Code. We are all expected to follow not only the Code, but all other ADI policies and guidelines.

Our Code applies to...everyone who works for ADI and its subsidiaries. This includes the Chief Executive Officer; the Chief Financial Officer; members of ADI’s Board of Directors; other senior financial, business, and technical management; and every employee. We are all responsible for complying with this Code as we carry out our duties for ADI. Failure to comply with the Code will result in discipline, up to and including termination.

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 in which 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 misconduct or potential misconduct. We are counting on you to use these compliance resources, which are described and listed in detail at the conclusion of 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 Signals.
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.

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
- Nationality
- Social or ethnic origin
- Sexual orientation
- Gender, gender identity or expression
- Marital status
- Pregnancy and/or parental status
- Disability
- Military status

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 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.

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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.

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.

CONTACT WITH QUESTIONS:
Compliance Resources

REQUIRED READING:
Environmental Health and Safety Policy,
Sustainability Report
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.
Transparency and Fairness

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.

LEARN. ADVANCE. TEACH.
Always deal fairly with our distributors:
• Do not fix or dictate retail prices.
• Do not pressure resale price maintenance.

MAKE IT POSSIBLE:
• Be careful when engaging in discussions with competitors and avoid the following agreements:
  • 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

The exchange of gifts and business entertainment can be a part of everyday business practice. 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.

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.
- Give or accept gifts only if the market value is $150 dollars or less.
- 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 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 comply with all applicable anti-corruption and anti-bribery laws in all countries where we do business. It is never permissible to give, offer or promise anything of value if the intention is to retain an unfair business advantage.

MAKE IT POSSIBLE:

- Understand the strict rules that apply when we deal with government officials, and comply with these rules.
- Keep in mind that our guidelines might be stricter than local statutes, and remember to comply with our guidelines at all times.
- Record all transactions and payments accurately and truthfully, and never conceal or attempt to conceal a payment.
- Comply with all Company policies and procedures when hiring and working with third parties.

LEARN. ADVANCE. TEACH.

- When we talk about “anything of value,” we mean more than just cash. For example, anything of 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 national governments, local governments, and companies that are owned or controlled by the government. “Government officials” also include political parties, party officials and candidates for public office.

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.
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.

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.
- Comply with Company policies when filing expense reports.
- Operate with integrity during the course of any external or internal audit.
- Maintain Company records in accordance with ADI’s 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 any concern regarding the Company’s books and records to your supervisor, ADI’s General Counsel, the Business Ethics Hotline or the Ethics Email Box described in the Open Door Policy section at the end of this document.

Making connections: 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.

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 or romantic partners in their direct or indirect reporting line.
• If you face a situation that you believe may involve a conflict of interest, report it to your manager or to ADI’s Legal Department.

MAKING CONNECTIONS: Between Conflict Disclosures and Trust

It is important to remember that, by disclosing a conflict of interest 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 General Counsel if needed and in accordance with ADI’s Conflict of Interest policy, 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.

CONTACT WITH QUESTIONS:
Compliance Resources

REQUIRED READING:
Ethics FAQ
Government Inquiries and Investigations

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 Legal Department, in the event of any government inquiry or investigation.

CONTACT WITH QUESTIONS:
Compliance Resources
Investor Resources

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 Legal Department will review the matter and advise and assist in responding to all government inquiries and investigations.

CONTACT WITH QUESTIONS:
Compliance Resources
Investor Resources

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

MAKE IT POSSIBLE:

• Contact ADI’s General Counsel immediately if you receive information about an investigation or a request for information from any government agency.
• Notify ADI’s General Counsel 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 General Counsel 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.

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• 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

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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.

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.
• 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.

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.

REQUIRED READING: Social Media Guidelines

CONTACT WITH QUESTIONS: 
Compliance Resources

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. When we are thoughtful, respectful and professional in our presentation, we sustain our reputation as a trustworthy company.
Data Privacy

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, something as basic as a person’s name is considered personal information. PII can also include things like employment history, government-issued identification numbers, age, ethnicity, phone numbers, email addresses, home addresses, and biometric and medical data.

CONTACT WITH QUESTIONS: Data Privacy Resources

REQUIRED READING: Data Privacy Policy

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.
- Do not send PII via email unless you have followed the appropriate encryption procedures.
- Collect and store PII only if it is relevant to your job.
- Use PII only as necessary to complete your job.

MAKING CONNECTIONS:

Between a Commitment to Data Privacy and Trust

Data breaches damage brands and reputations. When we prioritize the privacy and protection of the information we hold, we establish trust among one another and our stakeholders.
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 it at all times.

MAKE IT POSSIBLE:

• Always safeguard our intellectual property rights, including our patents and trade secrets.
• Seek guidance 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

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, manufacturing and strategic activities. The protection of our customers’ and our vendors’ information is equally important to us.

MAKE IT POSSIBLE:

• Protect ADI’s confidential information and proprietary information, and never misuse another person’s or company’s confidential or proprietary information.
• Use confidential information only for valid business purposes.
• Do not discuss ADI customers, vendors or products in public or with people not employed by ADI.
• Safeguard all 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 or other information that are 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 any of your compliance resources 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.

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.
• Keep technology devices, including mobile phones and laptops, as secure as possible.

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.

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.

CONTACT WITH QUESTIONS:

Compliance Resources

REQUIRED READING:

Technology Resources Policy
Trading Stock

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.

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.

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 profitability
• 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.
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.

MAKE IT POSSIBLE:

- Understand how trade controls, such as import and export laws, apply to your job responsibilities.
- Make sure you have the appropriate licenses before you receive or ship a product.
- Understand how export controls impact technology exchanges you have on ADI customer portals such as EngineerZone.
- Check if there are export license requirements prior to engaging in collaborations involving ADI employees of different nationalities.
- Be clear and precise when you describe our products to customs authorities.
- 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.
- Look out for red flags, which may signal problems or potential problems with imports or exports.

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 General Counsel.

CONTACT WITH QUESTIONS:
Export Compliance Department

REQUIRED READING:
Export Compliance Policies and Procedures

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 ongoing 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

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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. 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. We don’t expect or anticipate misconduct, but we need to know if something goes wrong so we can immediately begin taking steps to correct it.

Know that we have an open-door policy. We encourage you to bring the following to us:

• Questions about this Code
• Any awareness you have of violations or potential violations of this Code
• Concerns about questionable accounting or auditing matters or internal financial controls
• Information about any violations or potential violations of any law or regulation
How to Make a Report

If you need to make a report, you can start with the following compliance resources:

• Your supervisor
• The Human Resources Department
• ADI’s General Counsel

In addition, ADI has established a toll-free Business Ethics Hotline and an anonymous online submission form, operated by an independent third party, NAVEX Global, which can be reached at analog.ethicspoint.com, and an ADI Ethics Email Box where you can ask a question or make a report.

While we prefer that you identify yourself when reporting, you may remain anonymous if you wish. You will find more information about the Business Ethics Hotline and Ethics Email Box in the Compliance and Ethics area of the Circuit.

After the Report

If ADI receives information about misconduct or potential misconduct, appropriate individuals at the Company will work as quickly as possible to determine whether or not to proceed with an investigation. From the moment someone at ADI receives a report, the Company will do everything possible to preserve confidentiality, to the extent permitted by law. At ADI, we must all cooperate fully with internal and external investigations.

ADI’s General Counsel is responsible for tracking and responding to issues that arise under this Code and actual or potential violations of this Code. The process for following up on suspected violations of this Code is as follows:

• ADI’s General Counsel or another person authorized by ADI’s Board of Directors evaluates the available information about the suspected Code violation and determines whether further investigation is required. If the concern or complaint involves questionable accounting or auditing matters or internal financial controls, the General Counsel, Chief Financial Officer or ADI’s internal auditor will promptly forward the information to the Audit Committee of ADI’s Board of Directors, unless the General Counsel, Chief Financial Officer or internal auditor believe the report to be without merit, in which case they may delay reporting until the next Audit Committee meeting.

• The Audit Committee will determine whether further investigation is required and, if necessary, will decide upon and carry out a course of action to address the situation.

• The General Counsel, Chief Financial Officer or another person designated by the Board of Directors will then report the results of the investigation and 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

It is critical to understand that 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.