

ANALOG DEVICES, INC.

Political Activity and Contributions Policy

Introduction

Analog Devices, Inc. engages in advocacy on issues of importance to our business, customers, employees, shareholders, and the semiconductor industry as a whole. Additionally, many ADI employees, either on ADI's behalf or in their capacity, are also engaging in the political process. ADI's activities (and in some cases, the activities of its employees) are subject to federal, state, and local laws that regulate political activities, political contributions, and gifts – whether given by or on behalf of ADI and in some cases, including activities conducted by an employee in such employee's individual capacity. The failure to comply with these laws could expose ADI and certain of its employees to regulatory fines and penalties, loss of business, reputational risk, and criminal penalties. This Political Activity and Contributions Policy (this "Policy") aims to support ADI's efforts to comply with these laws and regulations.

This Policy outlines the practices and procedures, including pre-approval procedures, applicable to all ADI employees engaging in covered political activities and contributions – whether conducted on ADI's behalf or individually. Where this Policy speaks specifically to U.S. laws and regulations relating to corporate political contributions, lobbying, and the giving of gifts, employees in other jurisdictions are expected to follow the intent of this Policy, including any jurisdiction-specific addenda attached hereto, and to obtain the same pre-approvals when engaging in similar activities outside of the U.S.

Additionally, ADI employees are expected to comply with ADI's Code of Business Conduct and Ethics and all applicable laws, including those regulating lobbying, political contributions, and giving gifts to public officials.

As this Policy uses, "ADI" or the "Company" means Analog Devices, Inc. and all its global direct and indirect subsidiaries. Similarly, "Employees" means employees (including temporary employees and contractors) of ADI and any ADI subsidiary, including Analog Devices Federal LLC ("AD-Fed"). The definitions for the additional capitalized terms used throughout this Policy are set forth in the *Definitions* section below.

Questions about this Policy and requests for pre-approval should be directed to the Government Affairs team at GovernmentAffairs@analog.com.

Political Contributions and Activities

Corporate Political Contributions and Activity

Federal law and many states and localities prohibit corporations, like ADI, from making certain Political Contributions. ADI does not make any corporate Political Contributions of any kind, including Candidate Campaigns, Political Parties, Political Committees or "PACs," any other 527 Political Organizations, or Ballot Measure Committees. If ADI determined to make any such contributions in the future, they would be made only in accordance with applicable law.

To observe these restrictions and to enable ADI to comply with applicable laws related to its Government Affairs activities, ADI expects all Employees to comply with the following requirements:

- Not cause ADI to make any Political Contribution, whether monetary or "in-kind;"
- Not cause ADI to directly or indirectly reimburse or otherwise compensate any person for any Political Contribution;
- Not make any Political Contribution to obtain or retain business or to obtain any other improper advantage;

- Not engage in or threaten force or reprisal against any Employee to contribute to, support, or oppose any political group or candidate;
- Obtain pre-approval from the Government Affairs team prior to:
 - Using any corporate assets, funds, facilities, or personnel to benefit any Candidate Campaign, Political Party, Political Committee (including PACs), Ballot Measure Committee, or any other 527 Political Organization;
 - Forming any PAC or not-for-profit organization (e.g., a 527 Political Organization or not-for-profit 501(c)(4) organization) on behalf of ADI.

Personal Political Contributions and Activity

Many states and localities have strict liability “pay-to-play” laws that prohibit corporations, like ADI, from entering into Government Contracts as a result of personal Political Contributions made by certain employees and, in some cases, by their family members (e.g., immediate family, such as spouse and dependent children). Failure to comply with these laws, regardless of underlying intent, could result in ADI being prohibited from engaging in business in these states and localities for years. To ensure ADI complies with these laws, Employees with the title of SVP and above and those who interact with government agencies (including registered lobbyists) must obtain approval from the Government Affairs team before making or soliciting a Political Contribution. Please note that these Employees must also seek guidance from the Government Affairs team in advance for Political Contributions made or solicited by their immediate family members.

In addition, all Employees must obtain pre-approval from the Government Affairs team before engaging in volunteer campaign activity (e.g., working on a fundraiser or other activity to support a Candidate Campaign, Political Party, or Political Committee) in a manner that involves:

- The use of any ADI funds or assets (such as ADI facilities or personnel) in connection with such volunteer activity;
- Any Employee working on such volunteer campaign activity during working hours or
- Engaging in such volunteer campaign activity as a representative of ADI, as opposed to your capacity, or otherwise causing someone to believe that your actions reflect the views or position of ADI.

Please note that no Employee may make a Political Contribution, including from personal funds, to obtain or retain business or any other improper advantage.

Lobbying

Federal, state and local governments have laws requiring individuals to register as “lobbyists” and report Lobbying activity and expenditures. This registration and reporting requirement usually extends to a lobbyist’s employer. Depending on the jurisdiction, Lobbying may be defined broadly to include communications with Public Officials to influence federal, state, or local legislation, regulations, executive orders, or other governmental decisions, including, but not limited to, the decision to enter into a contract or other financial arrangement. Please see the Definitions section below for a complete description of activities that may be deemed Lobbying.

Federal Lobbying

ADI is not currently registered under the federal Lobbying Disclosure Act (“LDA”) but monitors Employees’ federal Lobbying activity to determine whether such activity may require it to do so. Accordingly, ADI expects all Employees to obtain pre-approval from the Government Affairs team and to complete required training before engaging in any Lobbying activity to influence any federal government action or decision, including through the retention of a third-party consultant or advisor (except as noted below under Special Exception for Federal Government Contract Lobbying). Approved Lobbying activities must be carried out in compliance with the LDA and this Policy.

Notable Exception for Federal Government Contract Lobbying

Notwithstanding the above, Employees do not need to obtain pre-approval for communications relating to the award or negotiation of a federal Government Contract to the extent such communications are directed only at career federal government employees (other than those in the Executive Office of the President) and military officers below the rank of O-7.

For example, negotiating a Government Contract for the sale of ADI products to a federal agency end customer would not require the pre-approval of the Government Affairs team if such employees only communicated with “rank and file” employees at the Department of Defense, as opposed to, for example, Schedule C political appointees or senior military officers.

Communications Related to Ongoing Contracts

Required communications and work performed by Employees for the ongoing administration of an existing Government Contract are not considered Lobbying, provided that in such communications and work performance, there is no attempt to influence a Covered Federal Official regarding policy matters or an award of a new contract.

Employees should contact the Government Affairs team if they are unsure whether their activities would be considered Lobbying under applicable law.

U.S. - State and Local Lobbying

Each state and certain localities also have laws requiring registration and reporting by lobbyists and, in some cases, by the lobbyist's employer. To ensure that ADI and its Employees comply with these laws, ADI expects all Employees to obtain pre-approval from the Government Affairs team and to complete required training before engaging in any Lobbying directed at any state or local government action or decision, including through the retention of a third-party consultant or advisor.

For Employees engaged in pre-approved Lobbying at the state or local level, all Lobbying must comply with applicable federal, state, and local laws. Please get in touch with the Government Affairs team for more information on how to document and report on such Lobbying activities and expenditures.

Gifts and Entertainment of Public Officials

The executive and legislative branches of the U.S. government and many state and local governments have enacted laws restricting Gifts to Public Officials (and in some cases to the spouse or children of such Public Officials). These laws range from absolute prohibitions to limited permissions. To help ADI comply with these laws, Employees are expected to obtain pre-approval from the Government Affairs team before providing any Gift to a Public Official (or to the spouse or child of any Public Official) or any third party, including a charitable organization at the request or on behalf of a Public Official.

Please note that a Gift may never be provided if it is linked to or intended to influence a specific government decision.

Employees Seeking Elected or Appointed Government Office

Employees are not prohibited from running for, being appointed to, or holding a federal, state, or local government office or from serving on public bodies created by federal, state, or local officials. However, issues related to inadvertently causing ADI to make a corporate Political Contribution and soliciting fellow employees may arise if one runs for an elective office. Moreover, federal, state, and local conflict of interest laws may prohibit or restrict the extent to which an Employee may hold a

Public office (elected or appointed) while being employed by ADI. Employees must obtain pre-approval from the Government Affairs team before running for, being appointed to, or holding any federal, state, or local government office or serving on any public body created by federal, state or local officials.

Trade Associations and Industry Coalitions

ADI belongs to several trade associations and industry coalitions worldwide, representing the interests of the technology industry, the industries in which ADI operates, and the broader business community. These organizations work to bring about industry consensus and advocacy on major public policy issues. Because these types of organizations may engage in Lobbying or other political activities, ADI employees must obtain written approval from the Government Affairs team before joining any trade association or industry coalition on behalf of the Company or causing ADI to pay to such an organization. For a list of the principal Trade Associations and Industry Coalitions that ADI participates in, please see the *Political Contributions and Expenditures* disclosure on the ADI Investor Relations page here: <https://investor.analog.com/governance/governance-documents>.

Policy Updates and Enforcement

This Policy is subject to updating by the Government Affairs team at any time. Failure to comply with this Policy may result in discipline, including termination of employment with ADI.

Definitions

527 Political Organization: This term refers to entities not registered or regulated under federal, state, or local election laws but otherwise exempt from U.S. federal income taxes as a political organization under Section 527 of the Internal Revenue Code.

Ballot Measure Committees: This term refers to committees established solely to promote or oppose the election of a state or local ballot measure or initiative. These committees are usually non-profits under Section 501(c)(4) of the Internal Revenue Code but are registered and regulated under state or local election laws.

Candidate Campaign: This term means any campaign or committee established by a candidate to further his or her own election to federal, state, or local governmental office and registered and regulated under the election laws of the federal, state, or local government.

Covered Federal Official: This term includes (i) Members and staff of Congress and (ii) the following high-level officials and employees of the Federal Executive Branch: the President and Vice President, officials and employees of the Executive Office of the President, officials in positions at Executive Levels I-V, Schedule C employees, and members of the uniformed services at pay grade O-7 and above.

Gift: This term means anything of value that personally benefits an individual (such as meals, entertainment, tickets to sporting or theatrical events, golf, travel, lodging, and payment for services). This does not include Political Contributions.

Government Contract: This term means any contract (for goods or services) or other business or financial arrangement with a federal, state, or local government agency, commission, board, authority, public fund, or any other governmental or quasi-governmental entity.

Lobbying: This term includes any of the following activities:

- Grassroots Lobbying: Any communication with the public or a segment of the public encouraging them to contact their government representative on a federal, state, or local legislation or other government decision.

- Legislative Lobbying: Any oral or written communication with a government official or employees to influence federal, state, or local legislation (for example, contacting a state legislator or staff member in an attempt to pass or introduce new or revised tax legislation, legislation to appropriate funds for, or implement, a state project, or any other legislation or resolution by the legislature).
- Procurement and Other Official Decision Lobbying: Any oral or written communication with a government official or employee to influence (1) a decision on the award or terms of a federal, state, or local Government Contract or (2) any other official decision of a governmental body. This term does not include adjudicatory proceedings or other efforts to convince the government that ADI complies with the law. This also does not cover seeking interpretations of a law or rule from a governmental entity.
- Regulatory Lobbying: Any oral or written communication with a government official or employee to influence a formal rulemaking or rate-making by a federal, state, or local executive branch agency (for example, contact the state tax commission to change a tax rule or the insurance commission to influence an insurance rate making).

Political Committee: This term refers to any committee established independent of a political party (and not a Candidate Campaign committee) and registered and regulated under the election laws of the federal, state, or local government (for example, a political action committee or “PAC”).

Political Contribution: This term means anything of value provided to benefit a Candidate Campaign, Political Party, Political Committee, any other 527 Political Organization, or Ballot Measure Committee. Political Contributions can be monetary (for example, corporate contribution checks, purchase of tickets for a campaign reception or dinner, or a loan) as well as “in-kind” (for example, the use of corporate facilities or personnel for a fundraiser, campaigning, or payment for services, and/or purchasing of materials or services). Contributions are covered whether made to directly benefit one of the entities above or to some other person or entity to ultimately benefit such entity, for the payment or retirement of debt incurred by a Candidate Campaign, or for transition or inaugural expenses incurred by a successful candidate.

Political Party: This term means any committee established by a political party (for example, the Democratic Party or the Republican Party) at the national level (for example, the DNC or RNC) or the state or local level and registered and regulated under the election laws of the federal, state, or local government.

Public Official: This term means an elected or appointed official or any other official or employee of any foreign, federal, state, or local legislature, executive branch agency, or other government agency, commission, board, authority, public fund, or other governmental or quasi-governmental entity.