

POLITICAL CONTRIBUTIONS AND EXPENDITURES

Last Updated: February 13, 2024

Analog Devices (ADI or the Company) engages in the political process to the extent such engagement advances the long-term interests of the company and shareholders. ADI Government Affairs is responsible for managing ADI's public policy issues and government affairs activities worldwide. When participating in particular public policy discussions, ADI Government Affairs pursues objectives that are beneficial to the semiconductor industry as a whole, as well as ADI's growth and business operations, such as supply chain resiliency, global trade, advanced research technology and innovation, intellectual property rights and protection, workforce development, and environmental and other sustainability initiatives. Additionally, ADI Government Affairs is focused on issues impacting the locations and communities in which it operates, and its employees reside.

ADI is committed to strong management, oversight and transparency when reporting the Company's engagement with government officials at all levels, and we consistently seek to provide our shareholders with relevant information regarding public policy engagement.

Political Contributions

ADI does not make contributions of any kind, whether monetary or "in-kind" (e.g., employee time, the provision of goods or services), to political parties or candidates, including any direct contributions by ADI through any intermediary organizations, such as political action committees (PACs) or lobbyists, campaign funds, or trade or industry associations and super PACs. This policy applies in all countries and across all levels of government, even where such contributions are permitted by law. In the future, if ADI makes any such contributions, we would disclose them on this website and as required by applicable campaign finance disclosure requirements. ADI does not make contributions to 501(c)(4) organizations, except in limited circumstances, in which case the recipient organizations are restricted from using ADI's funds to make any political contributions or to otherwise influence any federal, state or local candidate election.

Public Policy Expenditures and Advocacy

ADI engages in advocacy on issues of importance to the semiconductor industry, as well as to its business, customers, shareholders and employees. Through its advocacy activities, ADI only seeks to inform and influence government action on issues that affect the semiconductor industry and our business, customers, shareholders or employees and only through specifically authorized and legally compliant activities. All ADI advocacy activities require the prior approval of ADI Government Affairs with oversight by ADI's Chief Legal Officer. Where required by law, ADI files lobbying disclosure reports with federal, state and local governments with respect to its advocacy activities.

In fiscal 2023, ADI made no contributions or other expenditures meant to influence the outcome of ballot measures. As of September 30, 2023, we had an aggregate of \$370,000 in reportable federal lobbying expenditures during the 2023 calendar year. Due to a decrease in federal lobbying activities, ADI is no longer required to maintain a registration or file reports under the federal Lobbying Disclosure Act.

Trade Associations and Industry Coalitions

ADI belongs to a number of trade associations and industry coalitions worldwide, representing the interests of the technology industry, of industries in which ADI operates and of the broader business community. These organizations work to bring about industry consensus and advocacy on major public policy issues. ADI's participation in trade associations, including membership on a trade association board, does not mean that the Company agrees with every position a trade association takes on an issue. Indeed, from time-to-time ADI's public policy positions may differ from those of the trade associations of which we are members.

For fiscal 2023, in the United States, the principal trade associations and industry coalitions in which ADI held membership were as follows:

- Semiconductor Industry Association
- Open RAN Policy Coalition
- Semiconductor Research Corporation
- SEMI

Employee Public Service and Political Activity

ADI's employees have the right and are encouraged to pursue personal interests, including active participation in the political process in their communities. If ADI employees choose to participate in political activity, they do so as individuals and not company representatives. ADI employees who voluntarily participate in campaign activities must do so on their own time, or by taking paid time off or an unpaid leave of absence.

Compliance and Oversight

ADI's Nominating and Corporate Governance Committee (NCGC) has oversight over policies and practices in connection with government affairs, public policy and related activities and expenditures. ADI's management provides quarterly reports to the NCGC on such policies, practices, and activities.