



## **California Transparency in Supply Chains Act of 2010**

January 1, 2012

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 went into effect. The law requires companies to make certain website disclosures regarding their efforts to eradicate slavery and human trafficking within their supply chains.

Analog Devices does not use forced, involuntary or child labor. We also subscribe to the Electronic Industry Code of Conduct (EICC) and not only use it within our own operations but also expect our key suppliers to recognize the Code as well.

The EICC contains standards intended to eradicate slavery and human trafficking in the electronics supply chain. These standards promote best practices in a number of areas affecting human rights, including: freely chosen employment, child labor avoidance, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association.

Evaluation of Supply Chain and Certification. We require our key suppliers to complete a self-assessment questionnaire that asks a number of questions about corporate social responsibility, including several questions about our suppliers' compliance with these human rights standards. We also ask our key suppliers to sign agreements that represent that they comply with the EICC and that they will notify us if they fall out of compliance.

Supplier Audits and Accountability. Our agreements with our key suppliers also give us rights to audit their compliance with the EICC. In addition to random audits, if a supplier's self assessment questionnaire indicates that they fail to comply with the provisions of the EICC, they would be a candidate for audit. If an audit revealed a supplier's non-compliance, ADI would require the supplier take corrective actions to resolve the non-compliance. If the non-compliance is not corrected in a satisfactory time frame, we would cease to use them. In addition, ADI employees frequently visit the facilities of our suppliers, putting them in a position to report any observed violations of the EICC.

Training. We require our employees to take training on the Analog Devices Code of Business Conduct and Ethics, which prohibits forced labor and child labor. Employees must certify that they have read, understand and will comply with this Code. Employees in our purchasing and quality departments, as well as resident engineers, involved with suppliers are trained in the EICC and instructed to report any observed violations.