

Analog Devices, Inc. Responsible Minerals Policy

Purpose

To establish and communicate Analog Devices' position and requirements for regulatory compliance, and social and ethical responsibility for responsible sourcing of minerals.

Policy

In July 2010, the United States Congress passed legislation (Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) requiring publicly traded companies to disclose whether any conflict minerals "necessary to the functionality or production of their products manufactured or contracted to be manufactured" originated from the Democratic Republic of Congo (DRC) or its adjoining countries. This legislation was driven by concerns of armed conflict and human rights violations in these areas where the specific minerals, Tin, Tantalum, Tungsten, and Gold are abundant and are extracted and mined for export and further refining, globally. These minerals are frequently referred to as "conflict minerals" or "3TG's". Dedicated to responsible sourcing, Analog Devices (ADI) complies with this ruling and works to ensure that the 3TG minerals used in its products do not originate from conflicted mining sources in this region.

ADI's due diligence efforts on mineral traceability within its supply chain are aligned with the Organization for Economic Co-operation and Development (OECD) Guidance. ADI has adopted this 5-step due diligence framework to support investigation and ensure responsible sourcing of 3TG and other identified minerals such as cobalt, including risk assessment and sourcing mitigation. ADI utilizes its membership with industry initiatives and its workgroups, the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI), and its programs, such as the Responsible Minerals Assurance Process (RMAP) to support continuous improvement within its supply chain. ADI collaborates and works with its suppliers with support of these programs and guidance to exercise due diligence on sourcing throughout the mineral supply chain including risk assessments related to environmental or human rights concerns.

ADI complies with these regulatory requirements and guidelines on mineral sourcing and reporting for ethical and responsible sourcing of minerals used in its products. In support of this policy, ADI requires its global supply chain to exercise due diligence on mineral traceability and to provide transparency using industry-standard smelter reporting tools, and to utilize only RMAP conformant smelters within its supply chain. As a socially responsible global company, ADI utilizes responsible business practices for ethical sourcing to further protect human rights and safe working conditions, free from armed conflict, as in the activities of mining, extracting, or refining of mineral ores.

Identified materials or sources that are not aligned with ADI's Responsible Minerals Policy will be escalated for review and assessment to determine future relationships within or removal from the ADI supply chain.

To report actual or suspected non-compliance with ADI's Responsible Minerals Policy, please reach out to the [Responsible Minerals Team](#) or [Ethics Hotline](#).

Policy Contact Information

[Policy Owner: Responsible Minerals Team](#)

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