

**Company Name** Analog Devices  
**Industry** ICT (Own operations and Supply Chain)  
**UNGP Core Score (\*)** 4.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>4.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in its 2016-2018 Sustainability Report that it is subscribed 'to the RBA Code of Conduct, which provides that 'Participants are committed to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community'. Accordingly, ADI strives to maintain a work environment free of harassment that respects the dignity, safety, and security of our employees. ADI does not use forced, involuntary, or child labor in any of our facilities.' [2016-2018 Sustainability Report, 2018: <a href="http://analog.com">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: ILO Core: In its Code of Business Conduct, the Company states: 'ADI will not discriminate in hiring, promotion, employee compensation, and employment practices [...] ADI does not use forced, involuntary, or child labor in any of our facilities.' In addition, in its 2019 CSR Report, the Company indicates: 'ADI respects the rights of workers to associate freely and seek to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment'. However, no evidence further information found, including formal policy statement with respect to collective bargaining. [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a> &amp; 2019 Corporate Responsibility Report, 05/2020: <a href="http://analog.com">analog.com</a>]</li> <li>Not met: UNGC principles 3-6</li> <li>Not met: Explicitly list ALL four ILO for ICT suppliers: The Company uses RBA Code of Conduct to set out the expectation to its suppliers. In its 2016-2018 Sustainability Report, the Company states: 'we require all of our suppliers to conform to the RBA Code of Conduct'. Although the RBA Code of Conduct contains commitments on discrimination, child labour and forced labour, in relation to freedom of association and collective bargaining, it states the following: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. No further commitment could be found in latest documents. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a> &amp; 2016-2018 Sustainability Report, 2018: <a href="http://analog.com">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Explicit commitment to All four ILO Core: See above [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> <li>Met: Respect H&amp;S of workers: The Company indicates in its Code of Business Conduct: 'ADI conducts its business in compliance with all applicable laws, regulations, and standards regarding workplace safety and environmental protection. We are all responsible for ensuring that ADI policies, procedures, and guidelines regarding workplace safety and environmental protection are fully implemented and observed. ADI will not tolerate unsafe conditions in the workplace or conditions that endanger its employees, other parties, or the environment.' [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> <li>Met: H&amp;S applies to ICT suppliers: The RBA Code of Conduct sets out health and safety standards for suppliers. This Code used OHSAS 18001 and ILO Guidelines on</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Occupational Safety and Health as reference to set the standards. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="https://www.responsiblebusiness.org">responsiblebusiness.org</a> ] <ul style="list-style-type: none"> <li>• Not met: working hours for workers: In its 2016-2018 Sustainability Report, the Company states: 'ADI does not permit working hours to exceed requirements established by applicable local law. A work week should not be more than 60 hours, including overtime, except in emergency or unusual situations. Workers a ADI are allowed at least one day off per seven-day week.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. In addition, it is not clear what 'exceptional or unusual situations would be. Nothing found regarding working hours in the latest documents. [2016-2018 Sustainability Report, 2018: <a href="https://www.analog.com">analog.com</a> &amp; 2019 Corporate Responsibility Report, 05/2020: <a href="https://www.analog.com">analog.com</a>]</li> <li>• Not met: Working hours for ICT suppliers: The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. In addition, it is not clear what 'exceptional or unusual situations would be. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="https://www.responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: In its 2019 CSR Report, the Company states 'We periodically evaluate our sustainability priorities outlined in this report to ensure alignment with our long-term strategy. As part of this process, we regularly engage with key stakeholders to ensure we continue to focus on the most important issues.' These include the workforce, 'Through employee-led Green Teams, our employees focus on improving sustainability at local offices and provide feedback through our quarterly ADI Pulse engagement survey.' [2019 Corporate Responsibility Report, 05/2020: <a href="https://www.analog.com">analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT suppliers to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: In its 2019 CSR Report, the Company explains 'Our sustainability agenda is led and managed by our Chief Executive Officer alongside a senior management team that includes our Chief People Officer, Chief Financial Officer, General Counsel, Senior Vice President of Industrial and Consumer, and newly appointed Director of Social Purpose.' This approach includes 'Empowering People', which includes human rights. However, no further details found about the allocation of responsibilities, including either a specific person different than the CEO or a specify named senior level committee. [2019 Corporate Responsibility Report, 05/2020: <a href="https://www.analog.com">analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for ICT in supply chain</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in ICT suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Salient risk assessment (and context)</li> <li>Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Action Plans to mitigate risks</li> <li>Not met: Including in ICT supply chain</li> <li>Not met: Example of Actions decided</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: System to check if Actions are effective</li> <li>Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Comms plan re identifying risks</li> <li>Not met: Comms plan re assessing risks</li> <li>Not met: Comms plan re action plans for risks</li> <li>Not met: Comms plan re reviewing action plans</li> <li>Not met: Including ICT suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Company indicates in its Modern Slavery Act Statement 2018 and in its Business Code of Conduct that it has established an anonymous toll-free Business Ethics Hotline operated by an independent third party, NAVEX Global. It indicates the following: 'Within the US, Canada and US territories, dial toll-free 1-800-381-6302. Callers outside of the US, Canada, and US territories should dial their country-specific AT&amp;T direct access code, which can be found at this website. Once the caller is connected with AT&amp;T, the caller will be prompted to dial the hotline number, 800-381-6302. Callers in China should dial 4008811475.' [Modern Slavery Act Statement 2018, Jul 2018: <a href="http://analog.com">analog.com</a> &amp; Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved</li> <li>Not met: Channel is available in all appropriate languages: See above. However, it is not clear whether the channel is available in all appropriate languages. [Modern Slavery Act Statement 2018, Jul 2018: <a href="http://analog.com">analog.com</a> &amp; Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> <li>Met: Expect ICT supplier to have equivalent grievance systems: The RBA Code of Conduct requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' In addition, this Code indicates that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Opens own system to ICT supplier workers: See above. The Company discloses information about its grievance mechanisms in its Modern Slavery Act Statement, however it is not clear whether the channel is available for anyone who wants to report a complaint or only for employees. [Modern Slavery Act Statement 2018, Jul 2018: <a href="http://analog.com">analog.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The Company indicates in its Modern Slavery Act Statement 2018 and in its Business Code of Conduct that it has established an anonymous toll-free Business Ethics Hotline operated by an independent third party, NAVEX Global. It indicates the following: 'Within the US, Canada and US territories, dial toll-free 1-800-381-6302. Callers outside of the US, Canada, and US territories should dial their country-specific AT&amp;T direct access code, which can be found at this website. Once the caller is connected with AT&amp;T, the caller will be prompted to dial the hotline number, 800-381-6302. Callers in China should dial 4008811475.' However it is not clear whether the channel is available for anyone who wants to report a complaint or only for employees. [Modern Slavery Act Statement 2018, Jul 2018: <a href="http://analog.com">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: See above. However it is not clear whether the channel is available in all local languages. [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a> &amp; Modern Slavery Act Statement 2018, Jul 2018: <a href="http://analog.com">analog.com</a>]</li> <li>• Not met: Expects ICT supplier to have community grievance systems</li> <li>• Not met: ICT supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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