

**Company Name** Analog Devices  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score (\*)** 14.7 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
2.3	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
2.2	20	D. Performance: Company Human Rights Practices
2.9	20	E. Performance: Responses to Serious Allegations
3.6	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in its website section 'Integrity and Ethical Behavior 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.' [Integrity and Ethical Behavior, May 2019: <a href="http://analog.com">analog.com</a>]</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 website section Integrity and Ethics Behavior, 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, CHRB could not find a provision with respect collective bargaining. [Code of Business Conduct and Ethics,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a> &amp; Integrity and Ethical Behavior, May 2019: <a href="http://analog.com">analog.com</a>]</p> <ul style="list-style-type: none"> <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 website section 'Integrity and Ethics Behavior, 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'. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a> &amp; Integrity and Ethical Behavior, May 2019: <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 Occupational Safety and Health as reference to set the standards. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: working hours for workers: In its website section 'Integrity and Ethical Behavior, 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. [Integrity and Ethical Behavior, May 2019: <a href="http://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="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul>
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Responsible mineral sourcing in conflict areas: The Company states in its Conflict Minerals Policy Statement: 'Analog Devices is collaborating with other concerned electronics companies in developing methods to track the origin of metals used in electronics products, and we are using our reasonable best efforts to ensure that we do not directly or indirectly support violence and human rights abuses in the DRC region. We are working with the Responsible Minerals Initiative [...] in taking actions to facilitate responsible sourcing in the electronics supply chain.' However, it is not clear whether the commitment is extensive to high risk areas beyond DRC and adjoining countries. [Conflict Minerals Policy Statement, Ap 2018: <a href="http://analog.com">analog.com</a>]</li> <li>• Met: Based on OECD Guidance: In its Conflict Minerals Report 2017, the Company indicates: 'Analog Devices designed our due diligence measures to conform, in all material respects, with the internationally recognized due diligence framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Second Edition (OECD 2013) ("OECD Framework"), including related supplements for each of the conflict minerals.' [Conflict Minerals Report 2017: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Requires responsible mineral sourcing from suppliers: In addition, the Company indicates: 'Our Purchasing Terms and Conditions reinforce this policy with our suppliers. We require our suppliers that use tantalum, tin, tungsten, and gold in their products to verify in writing that they have procedures in place to demonstrate that the metals they procure are sourced in accordance with this policy. We also require them to submit their sourcing information using the RMI Conflict Minerals Reporting Template (CMRT) as a standard.' However, its Policy statement does not makes a reference to high-risk areas, focusing only in DRC and adjoining countries, and CHRB could not find a commitment which includes a reference to high-risk areas. [Conflict Minerals Policy Statement, Ap 2018: <a href="#">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	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: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights: The Company requires its suppliers to conform to the RBA Code of Conduct which contains a commitment to migrant workers rights. However there is no evidence of this commitment in the company's own Code of Conduct. [Code of Business Conduct and Ethics, Dec 2016: <a href="#">investor.analog.com</a>]</li> <li>• Met: Expecting suppliers to respect these rights: The Company indicates that it requires all its suppliers to conform to the RBA Code of Conduct, the RBA code contains the following commitment to migrant workers rights 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including...migrant...and any other type of worker'. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="#">responsiblebusiness.org</a> &amp; Integrity and Ethical Behavior, May 2019: <a href="#">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	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: Commits to stakeholder engagement</li> <li>• Not met: Regular stakeholder engagement: In its website the Company states: 'Stakeholder engagement is a collaborative process that is critical to the success of our company. Stakeholders include employees, customers, investors, communities, governments, suppliers, media, and financial analysts. The ways we engage with these groups are demonstrated throughout our report, and the results we have gathered are used to develop and enhance future policies, programs and sustainability initiatives.' However, CHRB could not find further evidence of the Company's engagement activities with its stakeholders (regular engagement). [Sustainability, May 2019: <a href="#">analog.com</a>]</li> </ul> <p>Score 2</p> <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	<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: Commits to remedy</li> </ul> <p>Score 2</p> <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>
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects ICT suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: In its website section 'Governance and Ethics', the Company states that one of the Board of Directors main responsibilities is: 'Evaluates and approves significant policies/proposed major commitments of corporate resources'. The Code of Business Conduct is included within these, and includes human rights commitments. [Corporate Governance, May 2019: <a href="http://analog.com">analog.com</a>]</li> <li>• Met: Board level responsibility for HRs: According to the Nominating and Corporate Governance Committee Charter: 'The Nominating and Corporate Governance Committee shall coordinate the Board's oversight of the Company's code of business conduct and ethics.' The Code of Business Conduct include human rights commitments. [Nominating and Corporate Governance Committee Charter, Dec 2018: <a href="http://investor.analog.com">investor.analog.com</a> &amp; Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	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: Incentives for at least one board member: According to its 2019 Proxy Statement: 'For fiscal 2018, we linked a significant portion of our executives' cash compensation to ADI's performance, measured by our OPBT margin and year-over-year revenue growth on a quarterly basis, through our executive performance incentive plan. [...] the Compensation Committee set target percentages of 150% of base salary for our Chief Executive Officer and between 90%-100% of base salary for our remaining NEOs. [...] In setting performance targets for our executive performance incentive plan, multiple factors are considered including our actual past business results, estimates of multi-year performance from our long-term strategic planning, and the performance of market competitors.' However, it is not clear whether human rights aspect are included in the performance evaluation. [2019 Proxy Statement, Jan 2019: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	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: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR</li> </ul> <p>Score 2</p> <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.1.2	Incentives and performance management	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: Senior manager incentives for human rights: According to its 2019 Proxy Statement: 'For fiscal 2018, we linked a significant portion of our executives' cash compensation to ADI's performance, measured by our OPBT margin and year-over-year revenue growth on a quarterly basis, through our executive performance incentive plan. [...] the Compensation Committee set target percentages of 150% of base salary for our Chief Executive Officer and between 90%-100% of base salary for our remaining NEOs [Named Executive Officers]. [...] In setting performance targets for our executive performance incentive plan, multiple factors are considered including our actual past business results, estimates of multi-year performance from our long-term strategic planning, and the performance of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>market competitors.' However, it is not clear whether human rights aspect are included in the performance evaluation. [2019 Proxy Statement, Jan 2019: <a href="http://investor.analog.com">investor.analog.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The Company discloses its identified risks in its Annual Report 2018, however none of them includes a reference to human rights risks. [Annual Report 2018, Mar 2019: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company indicates in its Modern Slavery Act Statement 2018: 'We require our employees to take training on the Analog Devices Code of Business Conduct and Ethics, which prohibits forced labor and child labor. In addition, all employees must take a training course on Corporate Social Responsibility. This course educates Analog Devices employees on the RBA Code. The course specifically addresses the principles of freely chosen employment, child labor avoidance, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association. Employees must certify that they have read, understand and will comply with the RBA Code.' [Modern Slavery Act Statement 2019, 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: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<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>• Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Requiring ICT suppliers to communicate policy down the chain: The Company indicates in its Modern Slavery Act Statement 2018, that: 'We also ask our key suppliers to sign agreements that represent that they comply with the RBA Code and that they will notify us if they fall out of compliance. Our standard terms of purchase and our standard service agreements also contain clauses that pass down the RBA Code to our vendors and service providers and require notification in the event of noncompliance.' The RBA Code of Conduct requires: '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> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: See above [Modern Slavery Act Statement 2019, Jul 2018: <a href="http://analog.com">analog.com</a>]</li> <li>• Not met: Including on ICT suppliers</li> </ul>
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2: See indicator A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: The Company indicates in its Modern Slavery Act Statement: 'We require our employees to take training on the Analog Devices Code of Business Conduct and Ethics, which prohibits forced labor and child labor. In addition, all employees must take a training course on Corporate Social Responsibility. This course educates Analog Devices employees on the RBA Code. The course specifically addresses the principles of freely chosen employment, child labor avoidance, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association. Employees must certify that they have read, understand and will comply with the RBA Code.' [Modern Slavery Act Statement 2019, Jul 2018: <a href="http://analog.com">analog.com</a>]</li> <li>• Met: Trains relevant ICT managers including procurement: See above. It also adds: 'Employees in our purchasing and quality departments, as well as resident engineers, involved with suppliers are trained in the RBA Code and instructed to report any observed violations.' [Modern Slavery Act Statement 2019, 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: Score of 2 on A.1.2: See indicator A.1.2</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: See above</li> </ul>
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2: See indicator A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: In its website the Company indicates: 'We verify our conformance to the RBA Code by engaging third party audit entities accredited by the RBA to conduct Validated Audit Programs (VAP) at our manufacturing facilities.' [Integrity and Ethical Behavior, May 2019: <a href="#">analog.com</a>]</li> <li>• Met: Monitoring ICT suppliers: In its Modern Slavery Act Statement 2018, the Company indicates: '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. [...] Our agreements with our key suppliers also give us rights to audit their compliance with the RBA Code. In addition to random audits, if a supplier's self-assessment questionnaire indicates that they fail to comply with the provisions of the RBA Code, they would be a candidate for audit.' [Modern Slavery Act Statement 2019, Jul 2018: <a href="#">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2: See indicator A.1.2</li> <li>• Not met: Describes corrective action process: In addition, it states: '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.' However, no further details found on the corrective action process nor information about the number of incidents found. [Modern Slavery Act Statement 2019, Jul 2018: <a href="#">analog.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of ICT supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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>• Not met: HR affects ICT selection of suppliers</li> <li>• Met: HR affects on-going ICT supplier relationships: The Company indicates in its Modern Slavery Act Statement 2018: '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.' [Modern Slavery Act Statement 2019, Jul 2018: <a href="#">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with ICT suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: In its website the Company states: 'Stakeholder engagement is a collaborative process that is critical to the success of our company. Stakeholders include employees, customers, investors, communities, governments, suppliers, media, and financial analysts.' However, CHRB could not find further information describing how the Company has identified and engaged with affected or potentially affected stakeholders. [Sustainability, May 2019: <a href="#">analog.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in ICT SC engaged</li> <li>• Not met: Communities in the ICT SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations</li> <li>• Not met: Identifying risks in ICT suppliers</li> </ul> <p>Score 2</p> <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>

### C. Remedies and Grievance Mechanisms (15% of Total)

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 2019, 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 2019, 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 2019, 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 2019, 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 2019, 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.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: ICT suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales</li> <li>• Not met: How complainants will be informed</li> <li>• Not met: Who is handling the complaint: Not included in the methodology</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level: In its Code of Business Conduct, the Company indicates: 'The Chief Legal Officer or another person authorized by ADI's Board of Directors evaluates the available information about the suspected Code violation and determines whether further investigation is required. Notwithstanding the foregoing, in the case of a complaint or concern about questionable accounting or auditing matters or internal financial controls, the Chief Legal Officer, Chief Financial Officer, or ADI's internal auditor will promptly forward the information to the Audit Committee of ADI's Board of Directors, unless the Chief Legal Officer, Chief Financial Officer, or internal auditor believe the report to be without merit, in which case they may delay reporting until the next Audit Committee meeting. The Audit Committee will determine whether further investigation is required and, if necessary, will decide upon and carry out a course of action to address the situation.' However, it seems that the escalation process refers to financial, and accountability and auditing topics, therefore it is not clear if human rights-related are subject to the same escalation process. [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The Company indicates in its Code of Business: 'ADI will not discipline, discriminate against, or retaliate against any employee who reports a complaint or concern in good faith.' However, no evidence found of this commitment being extensive to other stakeholders. [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company indicates that complainants can remain anonymous when contacting the Hotline: 'While we prefer that you identify yourself when reporting, you can also remain anonymous if you wish.' [Code of Business Conduct and Ethics, Dec 2016: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Expects ICT suppliers to prohibit retaliation: The RBA Code of Conduct, required for suppliers, indicates: 'Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.'</li> </ul> However, the non-retaliation requirement does not cover other stakeholders. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="https://www.responsiblebusiness.org/">responsiblebusiness.org</a> ]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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>

#### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage target timeframe</li> <li>• Not met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Achieved payment of living wage</li> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company states in its Code of Business Conduct that it 'does not use forced, involuntary, or child labor in any of our facilities.' In addition, in its website section 'Integrity and Ethical Behavior', the Company indicates: 'We use the RBA Code of Conduct definition of "child": any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported by ADI.' [Code of Business Conduct and Ethics, Dec 2016: <a href="https://www.investor.analog.com/">investor.analog.com</a> &amp; Integrity and Ethical Behavior, May 2019: <a href="https://www.analog.com/">analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Age verification of job applicants and workers</li> <li>• Not met: Remediation if children identified</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Child Labour rules in codes or contracts: The RBA Code of Conduct indicates: 'Child labor is not to be used in any stage of manufacturing.' However, there is no requirement to verify the age of job applicants and workers and to implement remediation programmes. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="https://www.responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>Not met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Pays workers in full and on time</li> <li>Not met: Payslips show any legitimate deductions: In its website section 'Integrity and Ethical Behavior', the Company indicates: 'The basis on which workers are paid is provided in a timely manner via pay stub or similar documentation.' However, it is not clear whether the documentation includes information explaining any legitimate deductions. [Integrity and Ethical Behavior, May 2019: <a href="https://www.analog.com">analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: The RBA Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. [...] Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.' [RBA Code of Conduct (version 6.0), Jan 2018: <a href="https://www.responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Does not retain documents or restrict movement: The Company indicates in its website that its 'workers are not required to hand over government-issued identification, passports, or work permits to our facility representatives as a condition of employment. All work must be voluntary and workers are always free to leave upon reasonable notice.' [Integrity and Ethical Behavior, May 2019: <a href="https://www.analog.com">analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How sure about agencies or brokers</li> </ul>
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Free movement rules in codes or contracts: The RBA Code of Conduct indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.[...] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [RBA Code of Conduct (version 6.0), Jan 2018: <a href="https://www.responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company indicates in its website that it 'regards open communication and direct engagement between workers and management to be the most effective ways to resolve workplace and compensation issues. 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, there is no reference to collective bargaining. [Integrity and Ethical Behavior, May 2019: <a href="http://analog.com">analog.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: The Company discloses the proportion of its workforce covered by collective bargaining agreements: 'Globally, approximately 2% of our employees belong to unions.' [GRI Index 2016-2017: <a href="http://analog.com">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA &amp; CB rules in codes or contracts: The RBA Code of Conduct indicates: '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. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' 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'. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	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>• Met: Injury Rate disclosures: The Company discloses information about its injury rates and Lost workday case rates from 2011-2017 in its website section 'Employee Health and Safety'. [Employee Health and Safety, May 2019: <a href="http://analog.com">analog.com</a>]</li> <li>• Met: Lost days or near miss disclosure: See above. [Employee Health and Safety, May 2019: <a href="http://analog.com">analog.com</a>]</li> <li>• Not met: Fatalities disclosures</li> <li>• Met: Occupational disease rates: It also indicates in its website that its 'workers do not participate in occupational activities with high incidence or high risk of specific diseases, which has resulted in no known or reported incidents in this area.' [Employee Health and Safety, May 2019: <a href="http://analog.com">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance</li> <li>• Not met: Met targets or explains why not</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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>• Met: Sets out clear Health and Safety requirements: The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> <li>• Not met: Occupational disease rates</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.a	Women's rights (in own production or manufacturing operations)	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: Process to stop harassment and violence: In its website, the Company states: 'We do not tolerate sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, or the threat of any such treatment at ADI.' However, CHRB could not find further information describing its processes to prohibit harassment, intimidation and violence against women. [Integrity and Ethical Behavior, May 2019: <a href="http://analog.com">analog.com</a>]</li> <li>• Not met: Working conditions take account of gender</li> <li>• Not met: Equality of opportunity at all levels</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: The RBA Code of Conduct indicates: 'Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.' However, there is no reference to measures to ensure equal opportunities throughout all levels of employment. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (in own production or manufacturing operations)	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: Respects max hours, min breaks and rest periods in its own operations: The Company indicates on its website that it '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 at ADI are allowed at least one day off per seven-day week.' However, no evidence found of references to international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [Integrity and Ethical Behavior, May 2019: <a href="http://analog.com">analog.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How it implements and checks this</li> </ul>
D.4.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: 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 international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: How working with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	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: Responsible mineral sourcing due diligence in supplier contracts: In its Conflict Minerals Policy Statement, the Company indicates: 'Our Purchasing Terms and Conditions reinforce this policy with our suppliers. We require our suppliers that use tantalum, tin, tungsten, and gold in their products to verify in writing that they have procedures in place to demonstrate that the metals they procure are sourced in accordance with this policy. We also require them to submit their sourcing information using the RMI Conflict Minerals Reporting Template (CMRT) as a standard.' However, there is no reference to OECD Guidance. [RBA Code of Conduct (version 6.0), Jan 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a> &amp; Conflict Minerals Policy Statement, Ap 2018: <a href="http://analog.com">analog.com</a>]</li> <li>• Not met: Builds capacity with smelters/refiners</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Met: Disclosure of smelter information in supplier requirements: The Purchasing terms and conditions reinforce policy, including the requirement to 'submit their sourcing information using the RMI Conflict Minerals Reporting Template (CMRT) as a standard'. [Conflict Minerals Policy Statement, Ap 2018: <a href="http://analog.com">analog.com</a>]</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Risk identification and disclosure in line with OECD Guidance</li> <li>Met: Identification of smelter/refiners and OECD due diligence: The Company describes its processes to identify the smelters/refiners in its supply chain, which include: 'Comparing the smelters and refiners identified by relevant suppliers via the CMRT survey against the RMI list of smelter and refinery facilities that have received a "conformant" designation for conflict minerals by participating in an independent third-party smelter audit. We also validated the smelters' status using RMI's Active Smelters and Refiners List; Gathering more information on smelters or refiners (SORs) that are not listed on the references mentioned above by working with the SOR directly, contacting the SOR indirectly through our suppliers, or conducting internet research. [...] ; Reaching out directly to SORs who are no longer certified as conformant by a recognized certification program to gather information regarding their plans of recertification, or lack thereof. [...]'; among others. [Conflict Minerals Report 2017: <a href="http://investor.analog.com">investor.analog.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Discloses smelters/refiners judged in line with OECD due diligence: Its Conflict Minerals Report 2017 include in Annex I the List of Smelter/Refiners evaluated by RMI as conformant smelters (also disclosed smelters with "active" status) [Conflict Minerals Report 2017: <a href="http://investor.analog.com">investor.analog.com</a>]</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Describes mineral risk management plan for supply chain: The Company includes in its Conflict Minerals Report 2017 a section related to its Risk Management Plan, which includes the following actions: 'In the event that a supplier reports on the RMI Conflict Minerals Reporting Template or it is discovered that the SOR has used conflict minerals sourced from mines that support armed conflict in the Covered Countries, then we work with the SOR to obtain its agreement to take steps to rectify the situation, including implementing corrective action to eliminate the use of non-DRC conflict free minerals in products supplied for ADI products, in an agreed upon timeframe. Should the SOR fail to mitigate the issue, ADI will discontinue engagement with the SOR; ADI will continue to work with our suppliers and with RMI to encourage smelters who have not yet obtained the "conformant" designation to do so.' [Conflict Minerals Report 2017: <a href="http://investor.analog.com">investor.analog.com</a>]</li> <li>Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Supplier and stakeholders engaged in risk management strategy</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

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, and so the score of 11.74 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.93 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.62 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Analog Devices made data public that met one or more elements of the methodology in 21 cases, leading to a disclosure score of 1.62 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>Met: Company reports on GRI: The Company discloses a GRI Index document. [GRI Index 2016-2017: <a href="http://analog.com">analog.com</a>]</li> </ul>

Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0 out of 4	<p>Analog Devices met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

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

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As CHRB Ltd, 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.

