

Corporate Human Rights Benchmark 2022 Company Scoresheet



Company Name Analog Devices

Industry ICT (Own operations and Supply Chain)

Overall Score 4.1 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
0.2	25	B. Embedding Respect and Human Rights Due Diligence
0.0	20	C. Remedies and Grievance Mechanisms
2.3	25	D. Performance: Company Human Rights Practices
0.8	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: General HRs commitment: The Company indicates in its Code of Corporate Social Responsibility: 'ADI is committed to ensuring that its employees are treated with respect and dignity and that its manufacturing processes are environmentally responsible'. This document includes a Labor and Human Rights section, where all ILO Core rights are included. However, no explicit statement committing to respect human rights was found in this policy. This indicator looks for a statement in a suitable source for policy according to CHRB's revised approach. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com] & [Anti-Slavery and Human Trafficking Statement, 01/2021: investor.analog.com] Not Met: Universal Declaration of Human rights (UDHR) Not Met: International Bill of Human Rights Score 2 Not Met: Commitment to the UNGPs Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Company has a commitment to the ILO Core: Although the Company has rules regarding different ILO core areas, no explicit commitment found from the Company to respect the human rights that the ILO has declared to be Fundamental Principles and Rights at work. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com] • Not Met: Company has a explicit commitment to All four ILO Core: The Code of Corporate Social Responsibility includes the following statements: 'Workers should not be discriminated []. Child labor is not to be used in any stage of

Indicator Code	Indicator name	Score (out of 2)	Explanation
Indicator Code	Indicator name	Score (out of 2)	manufacturing []. Forced, bonded, indentured, or prison labor should not be used in the workplace. []. The rights of workers to associate freely, form and join workers organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations, should be respected. 'However, the rights to freedom of association and collective bargaining are restricted to local laws, and no alternative measures are considered. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com] Score 2 Not Met: Company expect suppliers to commit to ILO Core: The Company's Code of Corporate Social Responsibility indicates: 'ADI suppliers are expected to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the Responsible Business Alliance (RBA) Code of Conduct and ADI's Code of Business Conduct and Ethics'. In addition, the Anti-Slavery Human Trafficking Statement 2021 states that it expects its 'key suppliers to recognize the RBA Code as well.' The RBA Code reads: 'the provisions in this Code are derived from key international human rights standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.' However, 'to be derived from' is not considered a formal statement of commitment according to CHRB wording criteria. In addition, it is not clear whether the RBA Code applies to all suppliers or only to key suppliers. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com] & [RBA Code of Conduct (version 7.0), 01/2021: responsiblebusiness.org]
			• Not Met: Company explicitly list All four ILO for suppliers: The Code states that 'ADI also expects its suppliers to operate in compliance with the laws, rules, and regulations in the countries in which they operate and to implement the principles of this Code'. In addition, the Company indicates in its Anti-Slavery Human Trafficking Statement 2021 that it expects its 'key suppliers to recognize the RBA Code as well.' This code includes the following statements: 'Workers should not be discriminated []. Child labor is not to be used in any stage of manufacturing []. Forced, bonded, indentured, or prison labor should not be used in the workplace. []. The rights of workers to associate freely, form and join workers organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations, should be respected'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'as permitted by' local laws. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. In addition, it is not clear whether the RBA Code applies to all suppliers or only to key suppliers. [Code of Corporate Social Responsibility,
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The Company indicates in its Workplace Safety Overview Policy: 'ADI regards the safety and health of its employees and the preservation of safe working conditions to be of paramount importance. ADI's safety regulations are written to ensure the well-being of all employees, as well as the preservation of equipment and property'. In addition, its Code of Corporate Social Responsibility includes a Health and Safety section, where it sets up requirements related to Occupational safety, emergency preparedness, Occupational injury and illness, above others'. [Workplace Safety Overview, 07/2019: investor.analog.com] & [Code of Corporate Social Responsibility, 01/2022: investor.analog.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Code of Corporate Social Responsibility states that 'Workweeks should not exceed the maximum set by local law. Except in emergency or unusual situations, a workweek should be restricted to 60 hours, including overtime, and workers should be allowed at least one day off per seven-day week. Under no circumstances may workweeks exceed the maximum permitted under applicable laws and regulations. Suppliers must offer vacation time, leave periods, and holidays consistent with applicable laws and regulations'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Expect suppliers to commit to H&S of their workers: The Code of Corporate Social Responsibility states that: 'ADI suppliers are expected to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the Responsible Business Alliance (RBA) Code of Conduct 7.0 and ADI's Code of Business Conduct and Ethics'. In addition, the Anti-Slavery Human Trafficking Statement 2021 states that it expects its 'key suppliers to recognize the RBA Code as well'. RBA Code reads: 'Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.' However, no requirement to commit to respecting the health and safety of their workers was found. In addition, it is not clear whether the RBA Code applies to all supplier or only to key suppliers. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com] & [RBA Code of Conduct (version 7.0), 01/2021: responsiblebusiness.org] Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its Code of Corporate Social Responsibility: 'ADI suppliers are expected to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the Responsible Business Alliance (RBA) Code of Conduct and ADI's Code of Business Conduct and Ethics.' On the other hand, the Company indicates in its Anti-Slavery Human Trafficking Statement 2021 that it expects its 'key suppliers to recognize the RBA Code as well.' RBA Code (7.0) reads: 'Working hours are not to exceed the maximum set by local law. Further, a wo
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	0.5	7.0), 01/2021: responsiblebusiness.org The individual elements of the assessment are met or not as follows: Score 1 • Met: Responsible mineral sourcing: 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'. • Not Met: Based on OECD Guidance: The Company indicates that '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: Third Edition (OECD 2016) ("OECD Framework"), including related supplements for each of the conflict minerals'. However, these reports are no longer considered a suitable source for policy statements under CHRB's revised approach. No additional evidence found. [Conflict Minerals Report 2020, 2021: investor.analog.com] • Not Met: Requires suppliers to commit to responsible mineral sourcing: In addition, the Company indicates in its Conflict Minerals Report 2020 that its Conflict Minerals Policy 'is communicated to ADI's supply chain with the expectation of compliance with the conflict minerals policy, and for the suppliers to provide sourcing information using the RMI Conflict Minerals Reporting Template (RMI CMRT) as a standard'. However, these reports are no longer consider a suitable source for policy statements according to CHRB's revised approach. No additional evidence found. [Conflict Minerals Report 2020, 2021: investor.analog.com] Score 2 • Not Met: Suppliers expected to make similar requirements of their s

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Women's rights Not Met: Children's rights: Met: Migrant worker's rights: The Company indicates in its Anti-Slavery Human Trafficking Statement 2021: 'We are members of the Responsible Business Alliance (RBA) []. Therefore, we subscribe to the RBA Code of Conduct (RBA Code) and not only use it within our own operations but also expect our key suppliers to recognize the RBA Code as well.' 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 [] migrantand any other type of worker'. [Anti-Slavery and Human Trafficking Statement, 01/2021: investor.analog.com] & [RBA Code of Conduct (version 7.0), 01/2021: responsiblebusiness.org] Not Met: Expects suppliers to respect at least one of these rights: The Company indicates in its Anti-Slavery Human Trafficking Statement 2021 that it expects its 'key suppliers to recognize the RBA Code as well.' The RBA code 7.0 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 includingmigrantand any other type of worker'. However, it is not clear whether the RBA Code applies to all suppliers or only to key suppliers. [RBA Code of Conduct (version 7.0), 01/2021: responsiblebusiness.org] & [Anti-Slavery and Human Trafficking Statement, 01/2021: investor.analog.com] Score 2 Not Met: CEDAW/Women's Empowerment Principles Not Met: Convention on migrant workers Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: The Company commits to remedy: The Company states in its Policy of Corporate Social Responsibility: 'Whistleblower and Remedy Process: [] ADI will promptly investigate allegations and pursue action to correct any adverse labor and human rights, health and safety, environmental, or ethics impacts'. However, no statement committing to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed was found. [Code of Corporate Social Responsibility, 01/2022: investor.analog.com Not Met: Company expect suppliers to make this commitment Score 2 Not Met: Collaborating with other remedy initiatives Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Zero tolerance attacks on HRs Defenders (HRDs) Not Met: Company expect suppliers to make this commitment Score 2 Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • 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 2019 update, 12/2019: investor.analog.com] & [Code of Business Conduct, 01/2022: investor.analog.com] • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board/Committee review HRs strategy Not Met: Examples/trends re HR discussion in the last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Incentives for at least one board member: The Company indicates: 'For fiscal 2019, we linked a significant portion of our executives' cash compensation to ADI's performance, measured by our operating profit before taxes as a percentage of revenue, or 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. [2020 Proxy Statement, 24/01/2020: investor.analog.com] Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board process to review bussiness model and strategy Not Met: Describe frequency and triggers for reviewing Score 2 Not Met: Meets both requirements under score 1 Not Met: Example of actions decided

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	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a Not Met: Senior responsibility for HR implementation and decision making: 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: analog.com] Score 2 Not Met: How it assigns Day-to-day responsibility Not Met: Day-to-day resources and expertise allocation in own ops
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Senior manager incentives for human rights: The Company indicates: 'For fiscal 2019, we linked a significant portion of our executives' cash compensation to ADI's performance, measured by our operating profit before taxes as a percentage of revenue, or 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 market competitors.' However, it is not clear whether human rights aspect are included in the performance evaluation. [2020 Proxy Statement, 24/01/2020: investor.analog.com] Not Met: At least one key HR risk, beyond employee H&S

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 Not Met: Performance criteria made public Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: HR risks is integrated as part of enterprise risk system: The Company discloses its `Risks associated with our international business operations` and others in its Annual Report 2019, however none of them includes a reference to human rights risks. [Annual Report 2019, 21/01/2020: investor.analog.com] Not Met: Provides an example Score 2 Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates its policy to all workers in own operations Score 2 • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Meets ILO requirement for suppliers on A.1.2.a Not Met: Steps to communicate policy commitments to supply chain [Modern Slavery Act Statement 2018, Jul 2018: analog.com] Not Met: Requires suppliers to communicate policy requirements Score 2 Not Met: How HR commitments made binding/contractual Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Scores at least 1 on A.1.2.a Not Met: How workers are trained on HR policy commitments Not Met: Trains relevant managers including procurement Score 2 Not Met: Score of 2 on A.1.2.a Not Met: Meets both requirements under score 1 Not Met: Trains suppliers to meet company's HR commitment Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its 2019 CSR Report, 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'. In addition, 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.' [2019 Corporate Responsibility Report, 05/2020: analog.com] • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process: The Company 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. [Anti-Slavery and Human Trafficking Statement, 01/2021: investor.analog.com] • Not Met: Disclose findings and number of corrective action

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging and terminating business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: HR affects selection of suppliers Not Met: HR affects on-going supplier relationships Score 2 Not Met: Describe positive incentives offered to respect human rights Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: In its 2016-2018 Sustainability Report, 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. No additional information could be found in the latest version of the CSR Report. [2019 Corporate Responsibility Report, 05/2020: analog.com] Not Met: Discloses stakeholders that HRs may be affected Not Met: Provides two examples of engagement with stakeholders Score 2 Not Met: Analysis of stakeholder views on company's HR issues Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Identifying risks in own operations Not Met: Identifying risks through relevant business relationships Score 2 Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts Not Met: Triggered by new circumstances Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describe process for assessment of HR risks and discloses salient HR issues Not Met: How process applies to supply chain Not Met: Public disclosure of the results of HR assessment Score 2 Not Met: Meets all requirements under score 1 Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Action Plans to mitigate risks Not Met: Description of how global system applies to supply chain Not Met: Example of actions decided on at least 1 salient HR issues Score 2 Not Met: Meets all requirements under score 1 Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 Not Met: System for tracking or monitor if actions taken are effective Not Met: Lessons learnt from checking system effectiveness Score 2 Not Met: Meets both requirements under score 1 Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Provides two examples of comms with stakeholders Score 2 Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Channel accessible to all workers Score 2 Not Met: Channel is available in all appropriate languages and workers aware
	complaints or concerns from workers		 Not Met: Describe how workers in the supply chain have access to grievance mechanism Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Grievance mechanism for community Score 2 Not Met: Describes accessibility and local languages and stakeholder awareness Not Met: Communities access mechanism direct or through suppliers Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Engages users to create or assess system Not Met: Examples (at least two) of how they do this Score 2 Not Met: Engages with potential or actual users on the improvement of the mechanism Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/c hannel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Response timescales and how complainants will be informed Not Met: Describe support (technical, financial,etc) available for equal access by complainants Score 2 Not Met: Describe types of outcome to complainant through use of mechanism Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Public statement prohibiting retaliation Not Met: Practical measures to prevent retaliation Score 2 Not Met: Company indicate it will not retaliate against workers/stakeholders Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
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 Not Met: Complainants not asked to waive rights Not Met: Company does not require confidentiality provisions Score 2 Not Met: Will work with state based non judicial mechanisms Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes how remedy has been provided Not Met: Says how it would provide remedy for victims if no adverse impact identified Score 2 Not Met: Changes to systems, processes and practices to stop similar impact Not Met: Describe approach to monitoring implementation of agreed remedy Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Number grievances filed, addressed or resolved and outcome achieved Not Met: How lessons from mechanism improve management system Score 2 Not Met: Evaluation of the channel/mechanism and changes made as result

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating		Not Met: Describes procedures to address delays of outcomes agreed with
	lessons learned		stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or		The individual elements of the assessment are met or not as follows: Score 1 Not Met: Pays living wage or sets target date: The Company is 'committed to
	manufacturing operations)	0	providing fair wages to all workers', however, no mention of a living wage timeframe could be found, or that it is already paying a living wage to all employees. [2019 Corporate Responsibility Report, 05/2020: analog.com] • Not Met: Describes how living wage determined Score 2 • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
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 • Not Met: Discloses living wage requirements in supplier code or contracts • Not Met: Improving living wage practices of suppliers Score 2 • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Avoids business model pressure on HRs (purchasing practices) Not Met: Practices adopted to pay suppliers in line with agreed timeframes Not Met: Review own operations to mitigate negative impact Score 2 Not Met: Meets all requirements under score 1 Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) Score 2 Not Met: Discloses names and locations of significant parts of SP and why Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of 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 • 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 2019 CSR Report, 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, 01/2022: investor.analog.com] & [2019 Corporate Responsibility Report, 05/2020: analog.com] • Not Met: Age verification of workers recruited Score 2 • Not Met: Remediation if children identified
D.4.4.b	Prohibition of 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 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 7.0), 01/2021: responsiblebusiness.org] Not Met: How working with suppliers on child labour Score 2 Not Met: Assessement of number affected by child labour in supply chain Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Job seekers and workers do not pay recruitment fee: In its 2016-2018 Sustainability Report, 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. Nothing further found in latest CSR Report. [2019 Corporate Responsibility Report, 05/2020: analog.com] Not Met: Commits to fully reimbursing if they have paid: In its 2016-2018 Sustainability Report, 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. Nothing further found in latest CSR Report. [2019 Corporate Responsibility Report, 05/2020: analog.com] Score 2 Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • 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 7.0), 01/2021: responsiblebusiness.org] • Not Met: How working with suppliers on debt & fees Score 2 • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Pays workers in full and on time • Not Met: Payslips show any legitimate deductions Score 2 • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts Not Met: How working with supply chain to pay workers regularly and on time Score 2 Not Met: Assessment of the number affected by failure to pay directly Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of 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 • Met: Does not retain documents or restrict movement: The Company indicates in its 2019 CSR Report, 'Analog Devices does not use forced or involuntary labor. All work must be voluntary, and workers are always free to leave upon reasonable notice. Our workers are not required to hand over government-issued identification, passports or work permits to our facility representatives as a condition of employment.' [2019 Corporate Responsibility Report, 05/2020: analog.com] Score 2 • Not Met: How these practices are monitored for agencies, labour brokers or recruiters

D.4.5.f Prohibition of forced labour: Restrictions on workers (in the supply chain) Profile of the supply chain of the supply	Indicator Code	Indicator name	Score (out of 2)	Explanation
Activation of workers (in the Supply chain)	D.4.5.f	Prohibition of		
workers (in the supply chain) Indicates: There shall be no unreasonable restrictions on workers freedom of movement in the facility in addition to unreasonable restrictions on entering or exting company-provided facilities. [] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment imployers and agents may not hold or otherwise distroy, 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 leave. [PRIA Code of Conduct version 7.0], 01/2012; respondibilitudiness.org] Not Met: How working with suppliers on free movement. Score 2 Not Met: Assessment of the number affected by retaining docs or restricting movement Not Met: Provides analysis of trends demonstrating progress. The individual celements of the assessment are met or not as follows: Score 1. The individual celements of the assessment are met or not as follows: Score 1. The individual celements of the assessment are met or not as follows: Score 2. Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retailation. The Company indicates in its 2019 CSR Report that it regards open comministion and direct engagement between workers and management to be the most effective work to resolve workplace and compensation issues. AD or the most effective work to resolve workplace and compensation issues. AD or the most effective work to resolve workplace and compensation issues. AD or the most effective work to resolve workplace and compensation issues. AD or the most effective work to resolve workplace and compensation issues. AD or the most effective work of resolve workplace and compensation issues. AD or the most effective work of resolve workplace and compensation issues. AD or the most effective work of the compensation issues. AD or the most effective work to resolve workplace and compensation issues. AD or the most effective wo		forced labour:		
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Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.b	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1
	Fatalities, lost		Not Met: Sets out clear Health and Safety requirements
	days, injury,		Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the
	occupational	0	last reporting period • Not Met: Fatalities disclosures for lasting reporting period
	disease rates		Not Met: Tatalines disclosures for lasting reporting period Not Met: Occupational disease rates for the last reporting period
	(in the supply		Score 2
	chain)		Not Met: How working with suppliers on H&S
			Not Met: Assessment of the number affected by H&S issues in the SP
			Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or		Not Met: Process to stop harassment and violence against women: In its 2016- 2018 Sustainability Report, the Company states: 'We do not tolerate sexual
	manufacturing		harassment, sexual abuse, corporal punishment, mental or physical coercion, or
	operations)		verbal abuse of workers, or the threat of any such treatment at ADI'. However, no
			further information found describing its processes to prohibit harassment,
		0	intimidation and violence against women. Nothing further found in latest
			documents. [2019 Corporate Responsibility Report, 05/2020: analog.com]
			Not Met: Working conditions take account of gender
			Not Met: Measures and steps to address gender pay gap at all levels of amplement.
			employment Score 2
			Not Met: Meets all requirements under score 1
			Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.4.8.b	Women's rights		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		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
		0	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 7.0), 01/2021: responsiblebusiness.org]
			Not Met: How working with suppliers on women's rights
			Score 2
			Not Met: Assessment on the number affected by discrimination or unsafe
			working conditions
D 40 -	Marabia a la acces		Not Met: Provide analysis of trends in progress made The individual elements of the assessment are met or not as follows:
D.4.9.a	Working hours		The individual elements of the assessment are met or not as follows: Score 1
	(in own		Not Met: Respects max hours, min breaks and rest periods in its own operations:
	production or		The Company indicates in its 2016-2018 Sustainability Report that it 'does not
	manufacturing		permit working hours to exceed requirements established by applicable local law. A
	operations)		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
		0	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. Nothing regarding working hours could be found in latest documents. [2019 Corporate Responsibility Report, 05/2020: analog.com]
			Not Met: Assesses ability to comply with its commitments when allocating
			work/targets
			Score 2
			Not Met: Meets both requirements under score 1
			Not Met: How it implements and checks this in its operations
D.4.9.b	Working hours		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		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."
			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,
		0	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 7.0),
			01/2021: responsiblebusiness.org]
			Not Met: How working with suppliers on working hours

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2
			Not Met: Assessment of number affected by excessive working hours
			Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refine rs in the mineral resource supply chains	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Due diligence in accordance with OECD Guidance 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, no reference found to OECD Guidance. [Conflict Minerals Report 2020, 2021: investor.analog.com] • Not Met: Works with smelters/refiners and suppliers to build capacity: The Company's 'due diligence measures performed with respect to products manufactured during 2019 included: [] Working with our suppliers to strongly encourage SORs in our supply chain to participate in the RMAP or a similar program and to cease sourcing from SORs who decline to participate in a RMAP or similar program'. No specific details found on capacity building activities for both suppliers and smelters & refiners. [Conflict Minerals Report 2019, 2020: investor.analog.com] Score 2 • Met: Contractual requirement to disclosure smelter/refiner information: The Purchasing terms and conditions reinforce policy, including the requirement to 'submit their sourcing information using the RMI Conflict Minerals Reporting
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	Template (CMRT) as a standard'. [Conflict Minerals Report 2020, 2021: investor.analog.com] Not Met: Contractual requirement covers all minerals The individual elements of the assessment are met or not as follows: Score 1 Not Met: Risk identification and disclosure in line with OECD Guidance: As indicated below the Company describes how it identifies smelters and refiners at risk. However, no further details found including risks identified. [Conflict Minerals Report 2019, 2020: investor.analog.com] Met: Identification of smelter/refiners and OECD Guidance: The Company describes its processes to identify the smelters/refiners in its supply chain, which include: 'Comparing the SORs identified by relevant suppliers via the CMRT against the RMI list of SOR facilities that have received a "conformant" designation for conflict minerals by participating in an independent third-party SOR audit. We also validated the SOR's status using RMI's Active Smelters and Refiners List; Gathering more information on 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 2019, 2020: investor.analog.com] Score 2 Met: Discloses smelters/refiners judged in line with OECD Guidance: Its Conflict Minerals Report 2019 include in Annex I the List of Smelter/Refiners evaluated by RMI as conformant smelters (also disclosed smelters with "active" status) [Conflict Minerals Report 2019, 2020: investor.analog.com] Not Met: Risk identification and disclosure covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Indicator name Reporting on responsible sourcing of minerals	Score (out of 2)	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes mineral risk management plan for supply chain: The Company includes in its Conflict Minerals Report 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
		0.5	discontinue 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 SORs who have not yet obtained the "conformant" designation to do so'. The Company also discloses organisational structure to manage conflict minerals risks: 'The Director of Environmental, Health & Safety (EH&S), who reports to the Senior Vice President of Global Operations and Technology, is the assigned team leader and is supported by representatives from different functional groups. The Conflict Minerals Team reports the program's conformance status quarterly to the Senior VP of Global Operations and Technology'. Steps taken to improve include 'strengthen our alternate sourcing strategy to transition out suppliers who fail to comply with our Conflict Minerals requirements'. [Conflict Minerals Report 2019, 2020: investor.analog.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation
			over time Not Met: Disclose better risk prevention/mitigation over time Score 2 Not Met: Suppliers and stakeholders engaged in risk management strategy Not Met: Risk management and response processes cover all minerals

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

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Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious		No allegations meeting the CHRB severity threshold were found, and so the score
	allegation No 1		of 3.30 out of 80 points scored in themes A-D has been applied to produce a score
			of 0.83 out of 20 points for theme E.

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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