

Analog Devices Inc.

TICKER
 NAS:ADI

MARKET CAPITALIZATION
 US\$34 billion

HEADQUARTERS
 United States

DISCLOSURES
UK Modern Slavery Act: Yes

TARGETS
 None

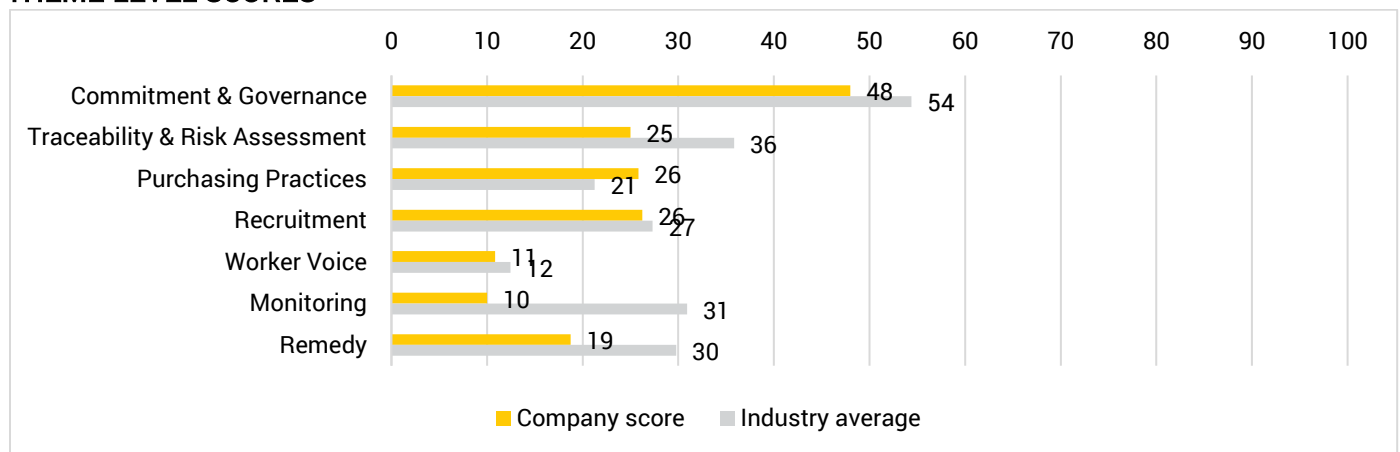
California Transparency in Supply Chains Act: Yes

OVERALL RANKING
27 out of 49

(2018 Rank: 22 out of 40)

OVERALL SCORE
24 out of 100
SUMMARY

Analog Devices Inc. (Analog Devices), a supplier to companies such as Apple and Intel, ranks 27th out of 49 companies and discloses less information on its forced labor policies and practices than its peers. Since 2018, the company has improved by disclosing training for suppliers on its supplier code of conduct, which addresses forced labor, and a grievance mechanism. Compared to 2018, the company's overall score decreased by four points, as it did not improve its performance and disclosure across themes. The company offers some disclosure across themes, yet it also scores lower than average on each theme. The company is encouraged to improve its performance and disclosure on the themes of Commitment & Governance, Traceability & Risk Assessment, and Worker Voice.

THEME-LEVEL SCORES


Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

KEY DATA POINTS**SUPPLIER LIST**

No

NO-FEE POLICY

Yes (Employer Pays Principle)

AVERAGE SUPPLIER SCORE

N/A

REMEDY FOR SUPPLY CHAINS WORKERS

No

HIGH-RISK SOURCING COUNTRIESLikely from Malaysia and/or China¹

LEADING PRACTICES

None.

NOTABLE FINDINGS

Supplier Code of Conduct: Analog Devices discloses that it uses version 6.0 of the Responsible Business Alliance Code of Conduct (which addresses forced labor) as its supplier code. The code requires the standards to be cascaded to the next tier of suppliers.

Training: The company reports that its employees and suppliers receive training on the code of conduct, which includes forced labor and human trafficking. The training is given to staff such as procurement.

Recruitment: The company's supplier code prohibits worker-paid recruitment fees and requires that fees shall be reimbursed to workers where paid. In addition, it prohibits the retention of workers' passports and identification documents.

OPPORTUNITIES FOR IMPROVEMENT

Commitment & Governance: The company is encouraged to establish and disclose a managerial structure with clear responsibilities and accountability for the implementation of its supply chain policies that address forced labor and human trafficking, and provide oversight of such policies at the board level.

Traceability & Risk Assessment: The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. Further, the company may consider disclosing the names and addresses of its first-tier suppliers and several data points on its suppliers' workforce.

Worker Voice: To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in

which workers in its supply chains are able to pursue alternative forms of organizing. Further, the company is encouraged to disclose examples covering different supply chain contexts of how it improved freedom of association and/or collective bargaining for its suppliers' workers, such as migrant workers.

ENGAGED WITH KNOWTHECHAIN

No.

¹ Most electronic devices are produced at least in part in China and/or Malaysia, two countries where electronics may be produced using forced labor. KnowTheChain (June 2020), "[2020 KTC ICT Benchmark Report](#)."