Analog Devices, Inc. Conflict Minerals Policy Statement

Analog Devices is committed to sound ethical practices and full compliance with all applicable laws and regulations. We are disturbed by the report of atrocities committed in the Democratic Republic of the Congo (DRC) and that groups committing these horrible acts are financed through the mining and trading of certain minerals. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Wall Street Reform Act) enacted in July 2010 requires publicly traded companies in the United States to conduct due diligence on their supply chains regarding the use of "conflict minerals" that benefit armed groups committing human rights violations in the DRC region. These conflict minerals are columbite-tantalite (coltan) refined into tantalum, cassiterite refined into tin, wolframite refined into tungsten, and gold.

The U.S. Securities and Exchange Commission (SEC) established and will enforce the implementing rules for Section 1502 of the Wall Street Reform Act. Beginning in 2014, all U.S. publicly traded companies are required to disclose annually whether they use tantalum, tin, tungsten, and gold that originated in the DRC and adjoining countries. In such an event, companies are required to submit a report that includes due diligence measures on the source and chain of custody of such metals, and the description of products that are not determined to be conflict free.

Analog Devices is collaborating with other concerned electronic companies in developing methods to track the origin of metals used in electronic 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 have been working with the Electronics Industry Citizenship Coalition (EICC) and the Global eSustainability Initiative (GeSI) extractives work group in taking actions to facilitate responsible sourcing in the electronics supply chain. We also support the Conflict Free Smelter (CFS) program to validate responsible sourcing.

As we do not source directly from smelters or mines, we are working closely with our own suppliers to understand the sources of the metals contained in their products, to assure conflict free metals in our supply chain. 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 EICC – GeSI Conflict Minerals Reporting Template as a standard.

For any questions or feedback, please send to conflictminerals@analog.com.