



ADI CODE OF BUSINESS CONDUCT

ADI'S COMMITMENT TO INTEGRITY

As an independent company, ADI enters its next chapter grounded in integrity, accountability, and trust.

We strive every day to be the indispensable partner of choice for our customers, suppliers, and team members. Earning and keeping that trust depends on how we conduct ourselves, how we treat one another, and how we make decisions. Our Code of Business Conduct sets clear expectations for ethical behavior and guides how we represent ADI in the industry.

The Code of Business Conduct outlines our standards for appropriate behavior, interactions, and communications with customers, team members, suppliers, and other stakeholders. It reinforces our commitment to complying with the law and conducting business with honesty and integrity, at all times. Acting with integrity means treating everyone fairly, professionally, and with respect. ADI does not tolerate discrimination or harassment based on race, gender, national origin, age, disability, sexual orientation, gender identity, or any other protected characteristic.

While the Code cannot address every situation you may encounter, it provides a strong framework to help you understand our expectations and recognize when to seek guidance. I encourage you to review the Code and reach out to our Integrity & Compliance Team with any questions, concerns, or suggestions.

Our reputation and long-term success are built not only on what we achieve, but on how we achieve it. By living our values and holding ourselves to the highest ethical standards, we strengthen our culture, our relationships, and our future as an independent company.

Thank you for the role each of you plays in upholding these principles every day.

Rob Aarnes

CEO

ADI Global Distribution



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INTRODUCTION TO OUR CODE

WHY HAVE A CODE?

Integrity and Compliance are central to everything we do at ADI. Acting with the highest standards of ethical conduct is essential to creating and maintaining trust between the company and its employees, customers, shareholders and suppliers. We recognize that we cannot achieve our business objectives and continue to be invited into customer homes, nor can we show that we are invested in our people, unless we operate from an unwavering foundation of integrity and compliance. We created the Code to provide our employees with an overview of the Company's expectations for acting with the highest ethical standards and in compliance with the law.

WHAT'S EXPECTED

We expect our employees to adhere to both the letter and spirit of this Code. You will learn more as you read through it, but the key takeaways are that when you are acting on ADI's behalf, we expect you to:

- be honest and transparent in all your dealings
- always comply with the law
- ask for help anytime you have a question or a concern about ADI's business practices

ADI operates in many countries around the world and local customs and social standards often differ from place to place. We expect our employees to follow national and local laws and regulations unless these violate U.S. law. When you have questions about which law to follow, aren't sure if a certain law applies to you, or have concerns that a local custom may be inconsistent with ADI's Code, we expect you to seek help from the Integrity & Compliance Team.



A MANAGER'S ROLE

Our managers, supervisors, and leaders should serve as role models for ethical business conduct. The bigger the role an employee occupies, the more we expect of them when it comes to modeling the right behavior and promoting compliance with our values and policies. We expect our managers to drive our culture of integrity, including:

- demonstrating ethical leadership through their words and actions
- ensuring that employees understand our Code and how the principles found in the Code apply to their jobs
- maintaining a work environment that promotes integrity and respect for the individual and that encourages employees to ask questions and raise concerns
- identifying and communicating to the Integrity & Compliance Team any areas where our compliance policies and procedures need to be strengthened
- providing guidance and assisting others in resolving questions concerning the Code and getting appropriate assistance where needed
- promptly escalating suspected violations of our Code so that they can be investigated

WHEN TO SPEAK UP



We encourage you to speak up if you have a question about whether conduct is ethical or if you observe behavior that concerns you, even if you are not certain that a violation has occurred. All employees are encouraged to escalate issues, concerns and questions so we can resolve potential compliance issues early.

Many avenues are available to our employees to raise concerns, including:

- their manager or any member of the management team
- the Legal Team
- the Integrity & Compliance Team
- any member of an Integrity & Compliance regional council
- Human Resources
- our external confidential helpline
 - on the web at: <https://adiglobal.integrityline.com/>
 - by phone at: **1-800-461-9330** (U.S.)¹
 - via an email to integrity@ADIGlobal.com

The helpline provides employees with a resource to seek advice, ask questions or report issues, including those related to fraud, business practices and compliance or suspected violations of our Code. The helpline is available 24 hours a day, 7 days a week.

Employees who choose to use the helpline — administered by a well-regarded independent vendor — have the option to remain anonymous (as permitted under applicable law). The helpline is available in English and in local languages where ADI has operations. If you choose to identify yourself when contacting the helpline, your identity and the information you provide will be treated confidentially to the greatest extent possible and will only be shared on a “need-to-know” basis. For additional information, please review the policy on [Raising or Reporting an Integrity or Compliance Concern](#).

WHAT DOES ADI DO WITH REPORTS?

ADI takes all reports of possible misconduct seriously and will investigate them. We ask that you report concerns as promptly as possible to ensure a thorough investigation and timely resolution.

During the investigation process, ADI will:

- form an investigation plan, including identifying appropriate and objective investigators
- determine the facts through interviews and review of documents
- determine corrective action, if necessary

Employees who become involved in an integrity investigation, should cooperate fully and answer all questions completely and honestly. Interference with an integrity investigation is itself an integrity violation.



WILL ADI PROTECT ME IF I SPEAK UP?

Yes. ADI strictly prohibits retaliation against anyone who raises a good faith concern about ADI's business practices. Our Integrity & Compliance program will not succeed unless employees trust they can raise concerns and ask questions without fear of retaliation. ADI will act swiftly against retaliatory behavior. Any individual who feels that they have been the victim of actual or threatened retaliation should immediately notify Human Resources or the Integrity & Compliance Team for help.

DIGNITY AND RESPECT, ALWAYS

We believe our diverse, talented global workforce is the key to our success. ADI does not discriminate against employees, applicants or anyone else with whom it does business. We also want all our employees to feel comfortable coming to work each day and believe that harassment is toxic to a productive and pleasant work environment.

Our prohibition of discrimination and harassment applies to all the characteristics protected by law, including but not limited to, discrimination or harassment based on the employee's race, color, gender, religion, national origin, age, marital status, citizenship status, political belief, disability, pregnancy, military service, veteran status, sexual orientation, gender identity, genetic information or medical condition.



HOW WE
TREAT ONE
ANOTHER

Some examples of prohibited conduct are:

- verbal: repeated unwanted requests for dates, sexual innuendoes, racial or sexual epithets, derogatory slurs, foul or obscene language, off-color jokes, questions about another's sexual experiences, or suggestive or insulting remarks or sounds
- visual/non-verbal: inappropriate written materials (including email and online content), racially or sexually derogatory posters, cartoons or drawings, suggestive objects or pictures, leering, or obscene gestures
- physical: interference or assault ranging from intentionally blocking someone's way to unwanted physical contact (for example, touching or rubbing someone)
- other: making or threatening reprisals because of a negative response to harassment

We encourage our employees to speak up whenever they witness or suspect discrimination or harassment. Additional guidance can be found in [ADI's Global Workplace Harassment Policy](#).

PROTECTING PERSONAL DATA

All Personally Identifiable Information ("PII") that ADI maintains about its employees, customers, prospects, vendors, or partners will be collected and used only for its intended and lawful purpose and with the appropriate notice to and consent of the individual, as required by local law. PII will be kept up-to-date, accurate and secure, and will not be kept for longer than is necessary. PII maintained by ADI will not be transferred to other employees unless they have a legitimate business need for that information and transfers to third parties will comply with our policies. We maintain detailed policies which govern how PII should be used and secured. See [Employee Privacy Notice \(Data Practices\)](#). Any misuse or security breach involving PII must be reported immediately via the established incident management process, the helpline or directly to ADI's Privacy Team at ADIPrivacy@ADIGlobal.com.

Special care will be taken with respect to sensitive personal or financial information maintained by the company, including social security or tax ID numbers, bank account numbers, credit/debit card numbers, driver's license information, maiden names, racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union memberships, sexual life, criminal activity, physical and mental health-related information or any information that can be used to access a person's financial resources. Employees must consult with ADI's Privacy Team if they wish to use or collect sensitive information in the course of their job in a way that has not been previously reviewed and approved by the Privacy Team.



KEEP FACILITIES FREE OF SUBSTANCE ABUSE

ADI wants to provide a safe workplace for all its employees. Substance abuse, in all forms, increases the risk of injury, illness and even death occurring in the workplace. For this reason, ADI strictly prohibits employees from working under the influence of alcohol or illegal drugs as well as misused legal drugs and over-the-counter medications. Alcohol may be used in moderation at an authorized company event. If you suspect a co-worker is under the influence while at work, please report the issue.

PROMOTING A SAFE AND HEALTHY WORKPLACE

We are committed to providing a safe workplace by integrating safety into our daily business decisions and eliminating hazards in a proactive manner. We have established procedures and processes that are designed to make our workplace healthier and safer. If you believe that an unsafe or unhealthy condition exists in any ADI facility, you should stop working and immediately report your concern to the Health and Safety Team.

KEEP FACILITIES FREE OF VIOLENCE

ADI will not tolerate violence or threats of violence. We are counting on all our employees to promptly report any concerns they have about workplace violence or the threat of such violence to the Health and Safety Team or Human Resources. We expect employees to help keep our facilities secure by ensuring that only authorized individuals have access to our workplace. If you have concerns that an unauthorized person is in a ADI facility, please promptly notify your manager or a member of the Health and Safety Team. If you believe there is immediate danger, you should contact local law enforcement. Please also see our policy on [Safety and Security at Work](#).



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ACT IN THE BEST INTEREST OF ADI

AVOID CONFLICTS OF INTEREST

A conflict of interest arises when an individual has a personal, social or financial interest that can compromise their judgment, actions or decisions in the workplace. Employees are expected to avoid conflicts of interest and, if they learn of a conflict, to promptly disclose it to the Integrity & Compliance Team.

In addition — because even the appearance of wrongdoing can jeopardize the trust that is fundamental to ADI's success — employees must disclose potential conflicts of interest, even if the employee does not believe that an actual conflict exists.

The following are common conflicts of interest — but keep in mind our Code requires you to disclose any actual or potential conflict, even if not specifically listed.

BUSINESS THAT BENEFITS FRIENDS, FAMILY MEMBERS, OR YOU

A conflict of interest arises where an employee benefits personally from a financial transaction that involves ADI. The most common example is sending ADI business to a company where the employee or someone close to that employee stands to profit from winning ADI's business.

An employee may not award ADI business that results in financial gain for the employee, their friend or family member unless the employee has obtained prior written approval from the Integrity & Compliance Team.

IMPROPER REPORTING RELATIONSHIPS

ADI prohibits family members from being in the same reporting chain as one another and the same rule applies to employees involved in any type of romantic relationship. If you are aware of a situation that might violate these rules, you should report it to Human Resources. We rely on our employees to promptly disclose if they become involved in a romantic relationship with someone who works in the same reporting chain, so the company can address and resolve the situation.

GIFTS AND BUSINESS ENTERTAINMENT

While small gifts and offers of business hospitality are a common part of conducting business, we all need to be mindful that when we accept these gifts and offers, we are increasing the likelihood that they may improperly influence our decision-making or give the appearance of doing so.

Employees may not request or demand gifts, hospitality or other hospitality favors from vendors or others seeking to do business with us. If gifts or offers of hospitality are voluntarily extended to our employees, we expect our employees to be transparent, only accept things that are reasonable in both value and frequency ("token" gifts), and notify their manager if they have any questions or concerns about whether they may accept the gift or offer of hospitality. Employees should only attend vendor events that are professional and compliant with our values and workplace harassment policy. Accepting cash is never permitted.

Employees can learn more by accessing the [ADI Gifts & Hospitality Policy](#). Employees should seek guidance from the Integrity & Compliance Team if they have questions about whether a business courtesy is appropriate.

OUTSIDE EMPLOYMENT

We are mindful that some ADI employees choose to have second jobs, but they must always ensure that any outside employment, including consulting work, does not conflict or appear to conflict with their duty of loyalty to ADI (such as working or performing services for a ADI competitor, vendor, supplier or customer).

Employees must also ensure they are not using ADI working time, relationships or resources — including confidential information — to engage in non-ADI work. Employees must avoid outside work that would require the employee to provide confidential company information, even if requested under the guise of collecting market or industry data. If you have questions about whether a second job or consulting engagement would be a problem under our Code, please contact Human Resources for guidance.

OPPORTUNITIES

All ADI employees owe a duty of loyalty to the company and may never take for themselves any business or investment opportunities that they learn about as part of their job and which therefore belong to ADI. Employees must also not refer such opportunities to friends or family members.

Employees can learn more about conflicts of interest by accessing the [ADI Conflicts of Interest Policy](#).

KEEP CONFIDENTIAL AND PROPRIETARY INFORMATION SAFE

ADI regularly creates or obtains valuable, non-public ideas and information of many types, which the law allows us to protect from use by outsiders.

Examples of company confidential information include new products, product functions or services; sales or marketing databases, strategies, pricing plans and proposals including non-public information about existing or potential customers or business partners; non-public information about an acquisition target or a planned or pending acquisition or divestiture; non-public financial targets or projections; and trade secrets of any sort, including information relating to ADI's vendors, customers or partners.

We all play a part in protecting the confidentiality of ADI's proprietary information. If you suspect any misuse, unauthorized use, or improper requests for access to confidential information, you should promptly notify your manager or any member of the Legal Team. You should also notify them if you become aware of any need for further improving our procedures regarding confidential information. If you have a business need to share the company's confidential information with people outside of ADI, please work with the Legal Team to ensure that appropriate agreements are in place to protect ADI's interests.



**PROTECTING
COMPANY
INFORMATION
AND
PROPERTY**



PROTECT COMPANY RESOURCES

Appropriate use of ADI resources is critical to our success. Among other things, employees must:

- safeguard ADI property against loss, theft, or misuse, including unauthorized use.
- ensure that business expenditures comply with ADI policies and procedures including the ADI Delegation of Authority Flowdown.

PROTECT AND RESPECT IP RIGHTS

We protect ADI's Intellectual Property ("IP"), and do not use or disclose it for non-ADI business purposes. We respect and protect the IP rights of others, and do not knowingly use another's IP, including any previous employer's IP, without written authorization from the Legal Team. IP may include patents, copyrights, trade secrets, trademarks, trade dress, designs, models, know-how, and other confidential information. We timely disclose inventions we make to the Legal Team.

We encourage our employees to use Generative Artificial Intelligence (AI) technology to work smarter, faster and

more creatively. However, sensitive ADI information (such as source code, names or other personally identifying information) and proprietary ADI data should never be input into any publicly available Generative AI. Data output by Generative AI should be reviewed by a human and is subject to the same ADI policies as human created data such as Intellectual Property clearance, open-source review and communication policies.

Additional information can be found in our policy on [Licensing ADI Intellectual Property](#).

USE ADI IT SYSTEMS RESPONSIBLY

We trust our employees and expect that they will use our IT systems and resources responsibly and in accordance with ADI's IT Policies, [Information Security](#) and [Acceptable Use of Information Resources](#). Generally, ADI IT systems and assets should be used to help further ADI's business and business interests.

ADI does allow employees to use company electronic equipment, such as the internet, for personal reasons provided such use is limited, does not interfere with the successful performance of ADI work, and is otherwise consistent with the Code and ADI Policy.

USE SOCIAL MEDIA AND NETWORKS RESPONSIBLY

Social networks can be a great enabler of ADI's business, but their use can raise various issues under our Code. All employees should take the time to pause and think before posting something on social media to consider whether their postings are consistent with Company policy and this Code. Here are a few pointers about using social media that will help:

- when posting on behalf of the company, always communicate in a respectful and professional manner
- do not fail to disclose your employment with ADI when commenting on social media about issues related to your work or ADI's business

When in doubt, please review the [ADI External Communications Policy](#) and [ADI Social Media Policy](#), or contact someone from the Communications Team for guidance.



NO INSIDER TRADING AND TIPPING

Under securities laws designed to protect investors, you and your immediate family members may not, either directly or through other persons or entities, buy, sell or otherwise trade in ADI securities while you are aware of material non-public information relating to the company, even if the decision to trade is based on other factors. Some examples of material non-public information include earnings results, revenue and income data, significant mergers and acquisitions and the gain or loss of a significant supplier or customer.

If you're considering engaging in a transaction in ADI securities, you should first review our [Insider Trading Policy](#) to ensure that the transaction you are considering complies with ADI policy.

If you have questions or concerns about the rules governing the trading of ADI securities, you should contact a member of the Legal Team for guidance.

Through your work at ADI you may receive material non-public information about other companies with whom ADI does business. Trading in the securities of those companies under such circumstances is also prohibited by our Policy and the law.

Finally, you should never recommend or suggest that anyone else buy or sell the securities of ADI or another company while you are aware of material non-public information. Such "tipping" can be every bit as illegal as engaging in trading that is prohibited by insider trading rules and can be punished harshly, even if the tipper received no economic benefit from the trade.





CONDUCTING BUSINESS GLOBALLY

WIN BUSINESS OPENLY AND HONESTLY

We win business by being open and honest and providing quality products and services. ADI operates in many countries around the world. While the customs and cultures may vary from one place to another, ADI's fundamental approach to winning business is to build strong and lasting relationships with our customers by providing them with high quality products and services and always operating from a strong foundation of honesty and trust. No matter where you are in the world working on ADI's behalf, acting at all times with integrity is the best way to build the types of long-lasting customer relationships that lead to sustained business success.



NO BRIBES OR CORRUPT ACTIVITIES

At ADI, we always want to win business fairly and legally and never because of bribery or corruption. Many laws around the world, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, strictly prohibit paying or offering bribes in an attempt to obtain or retain business or for any other improper purpose. ADI prohibits bribery and corruption in ANY proposed transaction, but employees should understand that the rules regarding business with government customers and other government officials are particularly strict and require the highest levels of rigor and caution.

While our [Anti-Bribery/Anti-Corruption Policy](#) is clear, compliance with global anti-corruption laws requires more than just good intentions. If you do business outside the U.S. or with government agencies anywhere, you must, among other things:

- be familiar with the company's Anti-Bribery/Anti-Corruption Policy, including its definition of government official, which is quite broad (and includes employees of state-owned enterprises)
- be aware of “red flags” for identifying suspicious transactions and avoid indirect, as well as direct, corrupt activities
- contact the Legal Team where a payment to (or other financial transaction with) a governmental official is proposed or requested prior to making or authorizing any such payment
- follow company policy on [Vetting Sales Intermediaries](#) for conducting due diligence before retaining sales intermediaries or other third parties to work with or on behalf of ADI
- ensure that all entries in books and records are entirely transparent, timely, accurate and complete
- promptly report any known or suspected violations of ADI's Anti-Bribery/Anti-Corruption Policy through any of the company's available reporting channels
- reach out for help any time you have questions about what is or is not permitted under the law or ADI's Anti-Bribery/Anti-Corruption Policy

GIFTS AND BUSINESS HOSPITALITY – ALL CUSTOMERS

Giving gifts, offering meals and other entertainment or providing travel to others with whom ADI does or is seeking to do business may, in some instances, violate global anti-corruption laws. All ADI employees must ensure that our gift giving and offers of hospitality are reasonable under the circumstances, lawful and always related to legitimate business opportunities. Employees or anyone acting on ADI's behalf should NEVER offer gifts or hospitality in an attempt to improperly influence a decision maker or where such offer might give rise to the appearance of corruption.

Please review the [ADI Gifts & Hospitality Policy](#) for more information. If you have questions about gifts and hospitality, you can also contact the Integrity & Compliance Team for help.

GIFTS AND HOSPITALITY WHEN GOVERNMENT EMPLOYEES ARE INVOLVED

Different gift rules apply when you are dealing with employees of the government. Such rules vary from location to location and are generally much more restrictive. If you are considering giving a gift or offering hospitality to ANY employee or official of a government entity, you must first consult with and get written approval from a member of the Legal Team.



COMPETE FIERCELY, BUT ALWAYS FAIRLY



Competition laws (known in the United States as antitrust laws), generally prohibit agreements between competitors that unreasonably restrict competition, such as:

- fixing or controlling prices
- dividing or allocating customers, bids, markets or territories
- limiting the sale or production of products and services
- refusing to sell to certain customers or to buy from certain vendors
- entering into "no poach" agreements or directly sharing pay data with other employers in the same labor market
- sharing competitive information

Informal understandings as well as express agreements may be illegal. Employees must ensure that they never — for instance, at trade association meetings — discuss pricing policy, contract terms, sales, costs, profits, product plans, production levels and capacity, or any other confidential information with competitors of ADI.

Other activities may also raise antitrust/competition law issues. Before doing any of the following, get prior written permission from the Legal Team:

- engage in conduct that could appear to be intended to harm a competitor, rather than serve our customers better
- restrict the territories or customers to whom a distributor may resell ADI products
- agree with resellers of ADI products on resale prices of the products they buy from us
- discuss joint ventures, mergers, acquisitions, joint buying, or other collaborative arrangements with competitors
- establish exclusive arrangements with vendors
- tie or bundle together different products or services (for example, contracts that require a buyer who wants one product to buy a second product)

- treat the company's installers, integrators and other partners in an unequal fashion by offering certain installers, integrators and other partners more favorable terms and conditions or by referring an unequal amount of business to them

Antitrust or competition law is complex and challenging, and the consequences of a violation substantial. If you're not sure how to handle an issue that arises or if you become aware of any possible violation (or attempted violation) of these laws, contact the Legal Team right away.



MARKET TRUTHFULLY AND ACCURATELY

When we tell the world about our products and services, we must ensure that we are truthful and accurate in our advertising, product packaging, marketing, and sales materials and that we do not mislead our consumers. This is also true when we make statements about our competitors or comparisons between our competitors' products and ours.

COMPLIANCE ACROSS BORDERS

ADI sources, manufactures, and distributes products across many jurisdictions, which requires us to comply with import and export regulations. These laws are complex, subject to frequent change and can be punished harshly. All employees that participate in international transactions such as sales, engineering, sourcing, or shipping should be mindful that certain obligations and restrictions may apply.

Here are a few key points to remember:

- always seek guidance from the Trade Compliance Team when contemplating a new international program or partnership

- do not hand-carry commercial materials across borders regardless of value without contacting the Trade Compliance Team
- allow the Trade Compliance Team to manage customs matters (do not contact customs authorities yourself)

Compliance with international trade laws is essential for ADI's continued ability to import and export in all jurisdictions. For additional guidance, please review our policy on [Trade Compliance](#).

COMMITTED TO HELPING COMBAT TRAFFICKING IN PERSONS AND CHILD LABOR

ADI is opposed to and strictly prohibits engaging in trafficking in persons, forced labor, and child labor (defined as those under 16 years of age or under the minimum age allowed by law, whichever is more strict) in any form in all aspects of our business, see [Combatting Human Trafficking, Forced Labor, & Child Labor Policy](#). ADI employees must immediately report any suspected instances of human trafficking, forced labor or child labor in our operations or in those of third parties with whom we do business. The company will promptly investigate and, if necessary, remediate the situation.

WE DON'T PARTICIPATE IN UNSANCTIONED BOYCOTTS

U.S. anti-boycott laws prohibit ADI from participating in any international boycotts that are not sanctioned by the U.S. Government.

Additionally, failing to report boycott requests to the government itself can be illegal. If you become aware of an actual or potential boycott request or action, it is your job to promptly escalate the issue to the Legal Team for guidance.





POLITICAL ACTIVITY AND CONTACT WITH GOVERNMENT OFFICIALS MUST COMPLY WITH ALL LAWS

ADI understands that the political process enriches the communities where we live and work. However, as individuals, when we participate in political activities, we should do so on our own time, at our own expense and ensure that our activities do not conflict with other obligations we may have under this Code. We also need to be sure that we are not using ADI's assets (such as funds, office equipment, facilities, supplies or even our own work time) to support political campaigns or other political activities.

ADI employees are free to make personal contributions to candidates or causes of their choice. However, political

activities by corporations are regulated and must be reported under U.S. law and under the laws of many countries where ADI does business. In some states and countries, political contributions by corporations are prohibited. Any contact with a government official may be considered a form of lobbying, so it's very important that all business-related political and lobbying activities (including as a member of a trade association) are in compliance with our [Government Relations Policy](#) and are discussed and coordinated with the Legal Team, to avoid even inadvertent violations of these laws.

KEEP HONEST, ACCURATE BOOKS AND RECORDS

As a publicly traded U.S. company, ADI must comply with securities laws that require ADI to disclose accurate and complete material information regarding its business, financial condition and results of operations. We must always work to ensure that our financial reporting and disclosures are full, fair, accurate, timely and understandable. This includes complying with all financial internal controls and raising any concerns about the accuracy of our records.

In addition to ensuring the integrity of financial records, we expect employees to make sure that all other company information is recorded and reported accurately. This includes, but is not limited to, information concerning the company's employees, research and development activities, strategic plans, travel and expense claims, and general operations.



**PROTECT OUR
SHAREHOLDERS'
INTERESTS**



LET LAWYERS HANDLE LEGAL PROCEEDINGS AND INVESTIGATIONS

ADI strives to cooperate with government inquiries and otherwise respond appropriately to legal proceedings of all kinds. To ensure we are meeting our legal obligations, we ask that you immediately notify the Legal Team if you become aware of any lawsuit, investigation, subpoena or legal proceeding that involves ADI or may impact ADI's business or business interests.

The Legal Team leads all efforts on behalf of the company in responding to legal matters.

We rely upon our employees to cooperate and tell the truth in connection with audits, investigations and

lawsuits. Employees must never, under any circumstances:

- lie or make knowingly misleading statements in connection with any investigation or legal proceeding or encourage or cause another employee to do so
- destroy, alter or conceal any documents (or other materials) in anticipation of or following a request for such documents in connection with any audit, investigation or legal proceeding
- do anything else designed to undermine the integrity of any audit, investigation or legal proceeding

LET THE COMMUNICATIONS TEAM HANDLE MEDIA INQUIRIES

You should never speak on behalf of ADI with the media or investment community unless you have been specifically permitted to do so as part of your job. If you're contacted by a member of the media to speak on behalf of the company, you must refer the contact to the Communications Department. If you're contacted by a member of the investment or analyst community regarding ADI, you must refer the contact to the Investor Relations Department.

Remember, you should never disclose confidential, proprietary or material non-public information to anyone outside of ADI unless expressly authorized to do so.



COMMUNITY SUPPORT

We want ADI to build a strong reputation for improving the communities where we operate and where our employees live. We're committed to making a measurable difference with a positive impact in our own neighborhoods, communities and the world.

We encourage our employees to get involved in helping the communities where we operate. ADI provides employees with opportunities to do local charitable work and promotes charitable contributions and other activities with not-for-profit organizations that are aligned with our business goals and values. Any charitable donations or activities on behalf of ADI or using company resources must be approved in writing in advance by the Integrity & Compliance Team.

ACTIVELY PROTECT THE ENVIRONMENT

We believe that an important part of being a good citizen is to do our part to protect the environment in which we live. We do this by looking for ways to use energy more efficiently, minimize emissions and greenhouse gas generation and minimize waste. We also look to build partnerships with those living in the communities where we operate so we can work together for the good of the environment. Our job in this area is never done – continuous, measurable improvement is always our goal.

BUILD STRONG PARTNERSHIPS WITH SUPPLIERS

We strive to build long-term relationships with our suppliers upon a strong foundation of trust and respect. When we select the suppliers with whom we will partner, we evaluate the quality of their products and services as well as their commitment to acting with integrity and complying with the law. We will not be influenced by gifts, favors or other personal benefits of any kind from our suppliers or potential suppliers.

We treat supplier confidential information with the same care as we treat ADI confidential information.



HELP WITH QUESTIONS OR CONCERNS

DON'T HESITATE TO REACH OUT

We have many avenues available to our employees to raise concerns. Employees are encouraged to reach out to any of the following resources for help:

- their manager or any member of the management team
- the Legal Team
- the Integrity & Compliance Team
- any member of an Integrity & Compliance regional council
- Human Resources
- our external confidential helpline:
 - on the web at: <https://adiglobal.integrityline.com/>
 - by phone at: **1-800-461-9330 (U.S.)**²
- via an email to integrity@ADIGlobal.com
- by U.S. Mail:
 - ADI Global Distribution Inc.
 - Attention: Integrity & Compliance
 - c/o Jeannine Lane
 - 275 Broadhollow Road
 - Suite 400
 - Melville, NY 11747

The ADI Helpline is maintained by a third party and provides employees with a resource to seek advice, ask questions or report issues. The Helpline is available 24 hours a day, 7 days a week.

Employees who choose to use the Integrity Helpline — which is administered by an independent third-party provider — have the option to remain anonymous (as permitted under applicable law).

²The list of Helpline phone numbers for international locations is available in the [Raising or Reporting an Integrity or Compliance Concern Policy](#) and on the Integrity & Compliance page of the ADI intranet.

NO RIGHTS CREATED

The Code does not alter the terms and conditions of your employment with ADI or your legal entity employer, as appropriate. The Code does not constitute an employment contract or an assurance of continued employment. In addition, the Code is not intended to and does not create any obligations to or rights in any employee, customer, supplier, competitor, shareholder or any other person or entity.

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