

1.0 Statement of Policy

“We act with intention to uphold and protect human rights in our company, communities, and supply chain. We embed our core values into everything we do so that we make decisions that protect the safety and dignity of our workers” Chief Legal Officer

Lam Research Corporation (“Lam Research”) is committed to respecting human rights and adhering to responsible business practices in accordance with applicable laws and regulations around the world. We commit to treating not only our workers with dignity and respect, but also those with whom we do business globally, including our customers, suppliers, and business partners. Lam Research’s Human Rights Policy (“Policy”) is driven by Lam’s Core Values, with support from the principles found in the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, International Labor Organization Core Labor Standards, Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises and Responsible Business Alliance Code of Conduct.

We also believe we have a responsibility to support the communities in which we live and work which includes upholding human rights principles in our community engagements. Our social impact platform highlights three strategic focus areas meant to empower individuals and communities to make progress at scale. They include transformative learning, resilient communities, and inclusive societies.

2.0 Scope

This Policy applies globally to all Lam owned companies, Lam employees, temporary workers, contractors, and consultants. Lam expects our suppliers and business and community partners globally to adopt similar principles and practices and to comply with Lam’s Global Supplier Code of Conduct. Lam’s supply chain is subject to regular due diligence and review and must continuously ensure to protect and mitigate human rights risks.

3.0 Administration

3.1 Decision Authority

Lam’s Chief Compliance Officer or appointed delegate is the administrator of this policy and is responsible for the overall implementation of this policy.

3.2 Enforcement

Lam’s Ethics & Compliance (E&C) team is responsible for the administration and governance of this Policy. The Environment, Social and Governance (ESG), E&C and other relevant functions within Lam support the implementation of the Policy including the assessments, regular reviews and audits and the ongoing risk management of human rights risks.

3.3 Training and Local Language Translation

The administrator is responsible for providing training to relevant employees. The Ethics & Compliance team shall continue to monitor training requirements and maintain all training records. This Policy is available in local languages including Malay, German, Japanese, Korean, Traditional Chinese, French, Dutch, and Simplified Chinese.

3.4 External Sharing

This Policy is available both internally and externally. No names of approvers are to be shared, and only the title of the authorizer can be shared.

4.0 Definitions/Acronyms

4.1 Human Rights Principles

4.1.1 Human Trafficking, Forced, Illegal and Child Labor

Lam does not tolerate any form of forced, bonded, or indentured labor, involuntary or exploitative prison labor, slavery, human trafficking, child, or any other forms of illegal labor. We do not use child labor, in which “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. All work or service must be free of any threat of penalty and must be offered voluntarily and freely. Those in Lam’s global supply chain may not hold or otherwise destroy, conceal, or confiscate or withhold access to identity or immigration documents, including government-issued identification, passports, or work permits unless required by law. Lam reports its efforts to address modern slavery under the California Transparency in Supply Chains Act, and the UK Modern Slavery Act, and other similar reporting laws as required.

4.1.2 Anti-Harassment and Inclusive Workplace

We value and are committed to ensuring equal opportunity in the workplace and promoting an inclusive culture. We operate based on our Core Values of open communication, mutual trust and respect, inclusion and diversity and strive to create a culture where employees feel valued, included, and empowered. We encourage and promote engagement between our employees, workers, and managers, without fear of discrimination, reprisal, intimidation, or harassment. We do not discriminate based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity, or national origin, citizenship, disability status, veteran status, or any trait or characteristic that is protected under applicable law.

4.1.3 Working Hours and Wages

At Lam, we ensure that our workers are provided with appropriate working conditions, competitive compensation, and reasonable working hours. Working hours are not to exceed the maximum requirements set by local law. Hours of work in a week should not exceed 60 except in emergency or unusual and temporary situations. Lam Research complies with applicable wage laws, including minimum wage, overtime, benefits, and payroll documentation.

4.1.4 Health and Safety

At Lam, we believe that health and safety in the workplace is a fundamental right. Our commitment and practice is set out in the Lam Research’s Environmental Health and Safety Policy. In addition, we comply with relevant health and safety laws and regulations. Our commitment to health and safety applies to anyone who enters any Lam facility whether they be employees, contractors, visitors, or partners. We do not tolerate threats, threatening behavior, or acts of violence against any individuals.

4.1.5 Freedom of Association and Collective Bargaining

Lam Research respects its workers’ rights to choose whether they wish to form or join a trade union and collectively bargain. We also respect workers’ rights to choose not to form or join a trade union and collectively bargain.

4.1.6 Responsible Sourcing and Conflict Minerals

Lam Research is aware of the human rights abuses that can occur through the mining and production of “conflict minerals”. We strive to only use responsibly sourced minerals in our



products. Our commitment and practices are set out in our [Conflict Minerals Policy Statement](#).

4.1.7 Protecting Privacy

We respect the privacy of our workers and employees and seek to only collect and maintain personal information required for business, legal and other permissible purposes. We comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared by Lam Research.

4.1.8 Environmental Responsibility

We aim to integrate environmental considerations into our business, including our operations, the products we design and make, and services we provide. We are committed to reducing the impact our operations make on the environment and the related effects on human rights by implementing strategies to prevent pollution, conserve resources, and reduce waste. Our commitment and practices are set out in our Environmental Health and Safety Policy.

4.2 Guidance and Reporting Concerns

Lam provides several easily accessible and confidential mechanism for anyone to seek guidance, raise concerns, or report potential or actual violations of this Policy, in confidence and without fear of retaliation. Questions or concerns can be directed to the Ethics & Compliance team at ethics@lamresearch.com or to Lam's Research's [Ethics Helpline](#). The Helpline is managed by an independent service which operates 24/7 and available in multiple languages. Lam Research promptly takes action to mitigate and/or remedy any adverse human rights impacts that are reported or request that appropriate remediation is taken by appropriate parties.

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