Lam Research Corporation
Global Supplier Code of Conduct

Introduction

Lam Research is part of a complex, dynamic global Semiconductor industry that propels technology forward while prioritizing a responsible supply chain that monitors and manages risk. We are committed to fostering a supply chain that is ethical, resilient, and diverse. Our focus on critical issues in our supply chain includes human rights, responsible mineral sourcing, and the environmental impact of climate change. As part of our commitment to driving industry collaboration, we are an active participant in several multi-stakeholder organizations such as the Responsible Business Alliance® ("RBA"). As a member of the RBA and in alignment with Lam' s core values, we are committed to complying with the RBA Code of Conduct in our own operations and in driving continuous improvements through our supply chain.

This Global Supplier Code of Conduct (the "Code") is based on the United Nations Guiding Principles on Business and Human Rights, the UN Global Compact, International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the RBA Code of Conduct. The Code encourages suppliers to leverage internationally recognized standards that align with the RBA Code of Conduct to advance social and environmental responsibility and business ethics.

Compliance, Engagement, and Performance

Compliance with Laws & RBA Code of Conduct

We recognize that suppliers operate in different legal and cultural environments globally. A key principle in the Code is the expectation that Suppliers will operate in full compliance with the laws and regulations of the countries in which it operates as well as international standards relating to human rights, environment, health and safety, ethics and management systems. In addition to the provisions of this Code and applicable laws, Lam expects Suppliers to comply with the most current version of the RBA Code of Conduct ("RBA Code"). The current version of the RBA Code (8.0, effective 2024) is available in multiple languages at https://www.responsiblebusiness.org/code-of-conduct/. Where the Code, the RBA Code, or national or local laws have requirements for the same subject matter, Suppliers will be measured against and expected to meet the more stringent requirements.

Engagement and Performance

In support of Lam Research's due diligence and compliance efforts, Suppliers are required to fully adhere to the Code, transparently share information, and commit to continuous improvement in their own operations and their Supply chain. Suppliers must participate in corrective action and risk mitigation activities, respond to data requests, grant access to factories for audits and disclose compliance information promptly.

Failure to comply with the provisions of this Code or implement mutually aligned corrective actions through our formal RBA-validated audit and corrective action process may impact the Supplier scorecard. A Supplier's adherence to the requirements of this Code may also influence Lam's decisions on further business engagements with that Supplier and may result in the Supplier's disqualification.

Labor

Human Rights and Labor Practices

Lam Research expects its Suppliers to conduct their business in compliance with all relevant labor and employment laws and regulations. Child labor is not to be used in any stage of manufacturing. The term “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 higher. In the absence of local law, the wage rate for student workers, interns, and apprentices should be at least the same wage rate as other entry-level workers that perform the same or similar tasks.

Lam Research is committed to protecting and respecting human rights globally in its operations as well as in its supply chain. Suppliers must not use any forced, bonded, indentured, involuntary, or prison labor, engage in slavery or trafficking of people, inhumane treatment, unlawful harassment, physical or verbal abuse, or unlawful discrimination. Suppliers are expected to demonstrate compliance with the requirements under global and local regulations related to human rights, child labor, forced labor and human trafficking, and implement relevant controls and conduct appropriate due diligence to prevent the occurrence of such practices in their own supply chains. All work performed by Suppliers’ workforce must be voluntary, and workers must be able to terminate their employment without penalty with reasonable notice.

Suppliers, and their agents and sub-agents, may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits, except that Suppliers may hold documentation if (i) holding is required by law and (ii) workers have access to their documentation. Suppliers must conduct appropriate due diligence to prevent withholding passports or other identity documentation by their agents and sub-agents. Suppliers, and their agents and sub-agents, must not require workers to pay any recruitment fees or other related fees for their employment. If any such fees are found to have been paid by any of a Supplier’s workers, the Supplier must ensure that such fees are promptly repaid to those workers. We expect our Suppliers to ensure that recruitment agencies used in their supply chains are monitored to assess and address risks of forced labor and human trafficking.

Suppliers must calculate and compensate their employees in compliance with local wage laws and provide legally mandated benefits. Suppliers must ensure that working hours (including overtime) do not exceed the maximums set by local law or the RBA Code. Where required by law, Suppliers must compensate workers for overtime at pay rates greater than regular hourly rates. All overtime worked by Suppliers’ workforce be voluntary and overtime hours should not exceed 60 hours a week except in emergency or unusual situations. Suppliers’ employees should receive at least one day of rest for every seven days worked and must be provided with a timely and understandable wage statement to workers for each pay period worked. Suppliers should not use deductions from hourly wages as a disciplinary measure.

Discrimination and Harassment

Suppliers must not permit discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, and other characteristics covered by the applicable laws. Appropriate measures, including disciplinary policies and procedures, should be established, and appropriately communicated internally to prevent discriminatory behavior in hiring and employment practices, including but not limited to the payment of wages, award of promotions, rewards, and access to training. Suppliers must ensure that workers are provided with reasonable accommodation for religious practices and disability. Suppliers must not require workers to undergo medical procedures that are harmful, coercive, or medically unnecessary or can be used in a discriminatory way, including genetic and other invasive tests.

Freedom of Association

Except as otherwise prohibited by local law, suppliers must respect the right of workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, or to refrain from such activities. Where collective bargaining is restricted by applicable legal requirements, Suppliers should permit workers to participate in other lawful forms of worker representation. Workers and their representatives must be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Health and Safety

Occupational Safety and Emergency Preparedness

Suppliers must ensure that all employees operate in safe working environments. Suppliers must take appropriate measures aligned to the RBA Code of Conduct or ISO 14001/45001, to detect, avoid, and respond to potential risks to the health and safety of employees, which includes eliminating or reducing hazards to the extent practicable, substituting processes or materials, and controlling hazards through proper design, implementing engineering and administrative controls, preventative maintenance, and safe work procedures. Where hazards cannot be adequately controlled by these measures, workers must be provided with appropriate, well- maintained, personal protective equipment (at no cost to the worker). Training on risks associated with the hazards must also be provided to employees. Reasonable steps must be taken to remove or reduce workplace health and safety risks for pregnant women and nursing mothers, including risks related to their work assignments. Suppliers must provide reasonable accommodation for nursing mothers.

Potential emergency situations and events must be identified and assessed by Suppliers, and their impact minimized by implementing emergency plans. Plans should provide for the mitigation of harms to life, the environment, and property, and should also include contact information for emergency responders and recovery plans. Suppliers must ensure that manufacturing, dormitories, production and warehousing areas are equipped with fire alarms, appropriate fire suppression equipment, adequate and unobstructed fire exit routes, and smoke detectors to ensure workers can escape in the event of a fire. Emergency drills should be regularly conducted.

Suppliers must ensure that procedures and systems are in place to identify, prevent, manage, track, and report occupational injury and illness. This should include provisions to encourage reporting, classification and recording of employee injury and illness cases, provision of necessary medical treatment, investigation of cases, and implementation of corrective actions to eliminate their causes to the extent practicable.

Physically Demanding Work and Machine Safeguarding

Worker exposure to physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks must be identified, evaluated, and controlled. Physical guards, interlocks, and barriers must be provided and properly maintained by Suppliers where machinery presents a risk of injury.

Sanitation, Food, and Housing

Suppliers must provide workers with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories must be maintained to be clean and safe and accessible to workers. Suppliers must ensure that dormitories have appropriate emergency exits, hot water for bathing and showering, adequate lighting, adequately conditioned ventilation, individually secured accommodations for storing personal items, and reasonable personal space.

Health and Safety Communication

Suppliers must provide workers with appropriate workplace health and safety information and training (in a language workers can understand) for all identified workplace hazards that they encounter, including mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information such as Material Data sheets, or other hazard information must be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training must include content on specific risks to relevant demographics, such as gender and age, if applicable. Training must be provided to all workers prior to the beginning of work and regularly thereafter. Suppliers must encourage workers to raise any health and safety concerns and must not engage in subsequent retaliation.

Environment

Suppliers must demonstrate effort to reduce impact on the environment including air, land, and water by meeting all environmental standards established by applicable environmental laws and regulations. Suppliers are encouraged to adopt appropriate energy, water, and waste efficiency measures and work toward improving factory environmental performance. All required environmental permits (e.g., discharge monitoring), approvals, and registrations must be obtained, maintained, and kept current, and their operational and reporting requirements must be followed.

Energy Consumption and Greenhouse Gas (GHG) Emissions

Lam Research has set a goal to achieve net zero greenhouse gas emissions by 2050. As part of our roadmap, we expect Suppliers to set science-based targets by 2030. Suppliers are responsible for providing requested environmental and emissions data to Lam Research on an annual basis, taking appropriate steps to set their own science-based targets.

Suppliers must report on their annual energy and water consumption and associated greenhouse gas production (i.e., scope 1, 2 and 3 emissions) must be identified, tracked and mitigated by Suppliers.

Suppliers should develop plans to reduce their greenhouse gas emissions including a corporate-wide greenhouse gas (GHG) emissions reduction goal. Suppliers must consider and implement appropriate methods to reduce energy consumption that can include, but not limited to: (1) Purchase of renewable energy; (2) improve factory energy efficiency to minimize their energy consumption; and (3) explore innovative technology to reduce energy consumption and GHG emissions.

Pollution Prevention

Suppliers must work to ensure that emissions and discharges of pollutants and waste are minimized or eliminated at the source or by practices such as adding pollution control equipment, modifying facility processes, or by other means. Suppliers' use of natural resources, including water, fossil fuels, minerals, and virgin forest products, should be responsible.

Suppliers must work to adopt and implement natural resource conservation measures such as modifying production practices, adjusting maintenance and facility processes, substituting/ re-using/ recycling materials, or other means as applicable.

Hazardous and Solid Waste

Chemicals, waste, and other materials posing a hazard to humans, or the environment must be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Suppliers must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid non-hazardous waste. Suppliers must ensure that hazardous and solid waste data is tracked and accurately documented.

Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations must be characterized, routinely monitored, controlled, and treated as required prior to discharge. Suppliers must conduct routine monitoring of the performance of their air emission control systems.

Materials Restrictions

Suppliers must adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

Water Management

Suppliers must implement a water management program to document, characterize, and monitor water sources, manage water usage and discharge, identify conservation and contamination opportunities. All factory wastewaters must be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers must conduct routine monitoring of the performance of their wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Ethics

Ethical Conduct

Suppliers must conduct their business with the highest standards of integrity and must be honest and transparent in all their business dealings. Suppliers must not mislead or deceive prior to or during any business dealings (contractual or otherwise) with Lam Research.

Suppliers must agree to uphold the highest standards of ethics as outlined below.

Business Integrity

Suppliers must prohibit all forms of bribery, corruption, extortion and embezzlement. Suppliers must ensure they adopt appropriate policies and procedures to prevent unethical business practices and comply with bribery and corruption laws, including the Foreign Corrupt Practices Act, the UK Bribery Act and all applicable anti-corruption laws in relevant jurisdictions.

No Improper Advantage

Suppliers must not offer or accept any money, gifts, or anything of value (including intangible benefits and gratifications such as meals and entertainment, as well as money and tangible goods), directly or indirectly (e.g., authorizing any other person to pay, give, offer or promise to pay or give money or any other thing of value), to improperly influence business decisions or to obtain or retain business or secure some other improper advantage with government officials or individuals in the private sector. Suppliers' employees may not give, offer, promise, or authorize gifts, meals, travel, and entertainment to government officials or state-owned entities without complying with our Code of Conduct, Code of Ethics, and applicable laws. Both our Code of Conduct and Code of Ethics are accessible via Lam's website:

- Lam Code of Conduct: https://www.lamresearch.com/company/ethics-and-compliance/
- Lam Code of Ethics: https://www.lamresearch.com/company/ethics-and- compliance/code-of-ethics/

Conflicts of Interest

Suppliers have an obligation to avoid conflicts of interest which would jeopardize or compromise the Supplier's ability to perform its contractual obligations. Suppliers have a duty to disclose to Lam Research any relationships or affiliations that could give rise to conflicts of interest.

Conflicts of interest can be properly addressed and avoided if promptly disclosed to Lam Research. Disclosures can be made via the online Conflict of Interest Disclosure Form here: https://lamresearchcorp.ethicspointvp.com/custom/lamresearchcorp/forms/coi/form_data.asp?la ng=en.

Intellectual Property

Intellectual property rights must be respected; transfer of technology and knowledge must be done in a manner that protects intellectual property rights and safeguards Lam Research's information. Lam Research's intellectual property rights (trademarks, logos, copyrights, trade secrets, "know-how," and patents) are its assets. Suppliers must protect assets from unauthorized disclosure or misuse.

Fair Business, Advertising, and Competition

Suppliers must uphold standards of fair business and advertising. We expect our suppliers to comply with competition and anti-trust laws which apply to their business and to ours.

Privacy and Protection of Identity

Suppliers must comply with all applicable privacy, personal data protection and cybersecurity laws and regulations.

Suppliers must have organizational measures in place to secure and protect any personal data they collect, store, process, transmit, share and erase.

Responsible Artificial Intelligence (AI)

Suppliers must disclose any use of AI technologies in the development, delivery or support of products or services provided to Lam Research. This includes the purpose, scope and nature of AI systems used as well as risks, functionality and limitations.

Suppliers shall have industry-aligned processes and procedures to govern their AI use, and ensure compliance with applicable laws and regulations, including but not limited to data protection, privacy, intellectual property and emerging AI-specific laws. Suppliers are expected to maintain governance structures to identify and mitigate risks such that AI is used ethically, fairly and without discrimination to individuals or groups, ensure explainability and maintain human oversight where appropriate.

Responsible Sourcing of Minerals

Suppliers must champion social responsibility and sustainability practices and comply with regulations to ensure that the materials and minerals they source are produced in accordance with local, national and international laws. We expect our Suppliers to conduct due diligence and perform chain of custody related to the sourcing of conflict minerals (tin, tantalum, tungsten, and gold) in alignment with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance. Suppliers must ensure that sourcing of conflict minerals as well as cobalt and mica do not contribute to human rights issues or conflict with the parameters outlined in the Human Rights and Labor Practices section of this document. Suppliers are required to provide information to Lam Research on their sourcing and use of minerals using the updated industry standard reporting templates (Conflict Minerals Reporting Template - CMRT and Extended Minerals Reporting Template - EMRT) from the Responsible Mineral Initiative (RMI) on an annual basis.

Management Systems

Suppliers must maintain a management system appropriate to the size, nature and context of their operations that, at a minimum: (a) includes a commitment to respect human rights and the environment; (b) incorporates a due diligence process; and (c) provides mechanisms for internal and external stakeholders to raise concerns and seek remedy in the event a supplier has caused or contributed to adverse human rights or environmental impacts within the scope of this Code; and (d) facilitates the supplier's compliance with applicable laws and Lam Research's requirements related to the supplier's operations (including this Code and the RBA Code).

Suppliers' management system must include a process identifying and mitigating operational risks related to this Code, processes for facilitating continuous improvement and internal audit mechanisms, as well as the following elements:

Company Commitment and Management Accountability

Suppliers must have corporate social and environmental responsibility policy statements affirming the Supplier's commitment to compliance and continual improvement. These should be endorsed by executive management and posted in the facility in the local language.

Suppliers must identify senior executives and company representatives responsible for ensuring implementation of the management systems and associated programs. Senior management must review the status of the management systems on a regular basis.

Improvement Objectives

Suppliers must establish written performance objectives, targets and implementation plans to improve their social, environmental, and health and safety performance, including periodic assessments of suppliers' performance in achieving those objectives.

Training and Legal Requirements

Suppliers must have programs for training and communicating clear and accurate information to managers and workers to ensure organization-wide understanding of applicable policies, procedures, improvement objectives, legal and regulatory requirements, and this Code of Conduct. Suppliers must also adopt or establish a process to identify and monitor changes in applicable laws, regulations, and Lam requirements, including the requirements of this Code of Conduct.

Risk Assessment and Risk Management

Suppliers must have a process to identify the legal compliance, environmental, health and safety and labor practice and ethical risks associated with their operations. Suppliers should determine the relative significance for each risk and implement appropriate administrative, procedural and physical controls to control these and ensure regulatory compliance.

Audits, Assessments, and Corrective Action Process

Suppliers must conduct annual self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code, and customer contractual requirements related to social and environmental responsibility. Suppliers must have a corrective action process for deficiencies identified by internal or external assessments, inspections, investigations, and reviews. Suppliers must provide access to Lam Research employees (or designated representative) to audit and verify working conditions/processes in place at factories/dormitories. Failure to provide access can be escalated to further review of business relationships.

Documents and Records

Lam Research expects Suppliers to maintain complete and accurate books and records and ensure all transactions are appropriately recorded. Suppliers must, at Lam's request, provide such information as Lam may request about the management systems required by this section and Suppliers' compliance with the provisions outlined in this Code.

Grievance Mechanism

Suppliers may seek guidance and raise concerns via Lam Research's Ethics Helpline. The Ethics Helpline is managed by an independent service where concerns may be reported anonymously. Lam's Ethics Helpline is available here: https://secure.ethicspoint.com/domain/media/en/gui/35911/index.html. All reports to Lam's Ethics Helpline are treated confidentially to provide a safe environment for Suppliers and their workers to share grievances and feedback without fear, reprisal, or retaliation. Suppliers should disseminate information about Lam's Ethics Helpline to relevant workers and stakeholders and must establish and maintain their own internal process for ongoing communication with workers, their representatives, and, where necessary, other relevant stakeholders. The process should be designed to obtain feedback on operational practices and conditions covered by this Code and foster continuous improvement. Suppliers should also have a communicated grievance process for their personnel to raise any concerns. Suppliers must provide a safe environment where workers may participate in the communication process and raise grievances without fear of reprisal or retaliation.

Supplier Acknowledgment & Attestation

We have received Lam Research's Global Supplier Code of Conduct and are committed to ensuring compliance with the Global Supplier Code of Conduct, as it may be modified from time to time, throughout the business relationship with Lam Research.

In addition to the above, the Supplier acknowledges having had the opportunity to review the RBA Code and commits to adhering to applicable provisions of the RBA Code, as it may be modified from time to time, throughout the business relationship with Lam Research.

☐ I acknowledge.

X _____

Authorized Company personnel

Company Name	Click or tap here to enter text.
Name of authorized Company personnel	Click or tap here to enter text.
Title of authorized Company personnel	Click or tap here to enter text.
Date	Click or tap to enter a date.

For further information on the Lam Research Global Supplier Code of Conduct, please contact ethics@lamresearch.com.