



## **Lam Research International Sàrl**

### **Slavery and Human Trafficking Statement**

**for the fiscal year ended June 30, 2019**

This statement is made pursuant to section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps that Lam Research International Sàrl has taken during the fiscal year ended June 30, 2019 to ensure that slavery and human trafficking are not taking place in our supply chain or any part of our own business.

#### **Our Business**

We are a global supplier of innovative wafer fabrication equipment and services to the semiconductor industry. We have built a strong global presence with core competencies in areas like nanoscale applications enablement, chemistry, plasma and fluidics, advanced systems engineering and a broad range of operational disciplines. Our products and services are designed to help our customers build smaller, faster, and better performing devices that are used in a variety of electronic products, including mobile phones, personal computers, servers, wearables, automotive devices, storage devices, and networking equipment.

#### **Our Supply Chain**

Sourcing the specialized components and products needed for our process equipment and services requires our supply chain to stretch around the globe. As a result, we focus our supplier management efforts on our top tiers of direct suppliers that support our manufacturing operations. Our Global Supply Chain Management Operations Contracts and Compliance Manager is responsible for implementing and managing a collaborative approach to working with our supply chain and strive to actively share best practices in order to mitigate our collective challenges with regard to human trafficking. Our supply chain is held to the same Core Values to which we hold ourselves, and we are committed to rewarding integrity and continuous improvement. Our supply chain is also held to Lam Research's Supplier Code of Conduct, which incorporates by reference and requires supplier adherence to the Responsible Business Alliance Code of Conduct as well.

#### **Policies and Practices**

Fair and humane employment practices are a core business principle to ensure compliance with applicable laws and provide a productive and unbiased workplace. Lam Research supports the Ten Principles of the UN Global Compact and the ILO Declaration on Fundamental Principles and Rights at Work, as outlined in our [Global Employment Practices Statement](#), including the protection of internationally proclaimed human rights. Through our compliance activities and efforts, we ensure that we are not complicit in human rights abuses, and support the abolition of child labor. In addition, Lam Research encourages freely chosen employment (elimination of all forms of forced or compulsory labor), compliance with applicable wage and benefits laws, humane treatment of employees, non-discrimination in respect of employment and occupation, and freedom of association and the right to collective bargaining. Our [Global California Transparency in Supply Chains Act of 2010 \(SB 657\) Compliance Statement](#) and our [Global Supplier Code of Conduct](#) also establish and confirm Lam Research's commitment to compliance with applicable laws and regulations, including the prevention of slavery and human trafficking, in its business operations and throughout its supply chain.

Since the 2018 fiscal year when Lam Research published its Global Supplier Code of Conduct, Lam Research has required its major direct product suppliers and new product suppliers to acknowledge its [Global Supplier](#)

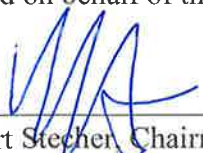
Code of Conduct to ensure supplier commitment to applicable laws and regulations, including but not limited to the prevention of slavery and human trafficking, requiring freely chosen employment, avoidance of child labor, compliance with applicable wage and benefits laws, humane treatment of employees, non-discrimination, and freedom of association in their business operations and throughout their supply chain.

During the 2019 fiscal year, Lam Research completed an 18 month long pilot program to help raise awareness in our supply chain, and understand how to support our suppliers to prevent and eliminate forced and bonded labor of foreign migrant workers (“FMWs”) in our supply chain. The pilot program was comprised of certain major direct material suppliers with factories in Malaysia and Singapore, and involved 1) Requiring pilot program participants to update their company policies for more comprehensive policies prohibiting forced labor/bonded labor in any form; 2) Communicating expectations to prevent forced and bonded labor to all agents and subagents in the home and destination countries; 3) Mapping the journeys of existing FMWs from their home country or province to their facility, and noting all agents and steps involved; 4) Assessing the journeys of their FMWs, and identifying risk points and any controls in place; and 5) Creating a corrective action plan for their FMWs to address the identified risks, and if there were any fees charged to foreign migrant workers, the pilot program participants will repay any fees to such migrant workers associated by the end of the 2019 calendar year.

The steps that Lam Research International Sàrl has taken include the following:

1. Verification. In order to verify prospective direct product suppliers, we require all new direct materials suppliers, as part of the supplier screening process, to provide a completed written certification that addresses risks of human trafficking and slavery (described in paragraph 3 below). The verification is conducted by Lam Research’s Global Supply Chain Management Contracts and Compliance Manager.
2. Auditing. We periodically audit major direct product supplier operations to address the risks of human trafficking and slavery in our supply chain. The audit is conducted by Lam Research employees, directly or in conjunction with third parties. During the last fiscal year, audits were announced, but we reserve the right to conduct unannounced audits.
3. Certification. We request a written certification from major direct product suppliers that the materials incorporated into their products comply with applicable laws and regulations, including laws regarding slavery and human trafficking of the country or countries in which they are doing business. During the 2019 fiscal year, 55% (or 190) of our major direct product suppliers responded to the certification. Additionally, suppliers are contractually required to comply with all applicable laws, regulations and policies, including but not limited to compliance with the Responsible Business Alliance Code of Conduct v 6.0, as updated during the term.
4. Internal Accountability. Lam direct product suppliers, employees, and contractors who fail to comply with Lam’s policies are subject to corrective action up to and including termination.
5. Training. During the last fiscal year, we continued required annual training of front-line employees and managers with direct responsibility for supply chain management and onsite audits on how to identify and mitigate risks of human trafficking and slavery.

This statement has been approved by the Board of Managing Officers for Lam Research International Sàrl. Signed on behalf of the Managing Officers of Lam Research International Sàrl.

  
Robert Stecher, Chairman