



**Lam Research®**  
**Global Standards of Business Conduct**

*Living Our Core Values*

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# 1 Introduction

## 1.1 Statement of Policy

The Global Standards of Business Conduct Policy (“Policy” or “Global Standards”) supports Lam’s Core Values and specifies the standards of business conduct that we expect of each member of our workforce at Lam and its subsidiaries (“Lam” or “Company”). This Policy supplements, and does not replace, other Lam policies and procedures, which also govern your behavior. You are required to read and understand this Policy, to act ethically at all times, and to exercise high standards and judgment. Because of the importance of the topics covered in this Policy, you must sign a document at the time of hire and periodically thereafter certifying your understanding of and compliance with this Policy.

This Policy is based on various laws as well as Company policies. Violations of those laws may result in civil or criminal penalties and punishment of the Company and its employees.

You are expected to seek guidance when you have questions or concerns about the topics covered by this Policy, and to promptly notify Lam’s Legal Department (“Legal”) or the Ethics and Compliance team of any disclosures required by this Policy. You can contact our Ethics and Compliance team confidentially by emailing [ethics@lamresearch.com](mailto:ethics@lamresearch.com). You can also contact our Ethics Helpline online at [www.lamhelpline.ethicspoint.com](http://www.lamhelpline.ethicspoint.com), or by phone at 1-855-208-8578 if you are in the U.S. Additional phone numbers for other countries are online at [www.lamhelpline.ethicspoint.com](http://www.lamhelpline.ethicspoint.com).

The topics in the Policy are organized under major headings for ease of reference. These headings represent our relationships with each other, our Company, and other companies and stakeholders. Some topics may apply to more than one group.

Lam may modify or rescind any provisions in this Policy at any time without prior notice.

## 1.2 Affected Parties

This Policy applies globally to all Lam employees, temporary workers, contractors, and consultants. Each individual is responsible for compliance with the Policy. Legal is responsible for interpretation of the Policy.

## 1.3 Administration and Enforcement

A delegate of the Chief Legal Officer is the administrator of this policy and may amend this policy as needed. Exceptions to this policy require approval of the Chief Executive Officer or Chief Operating Officer and the Chief Legal Officer or Vice President of Legal for Ethics and Compliance. Operations executives of the Company (such as an Operations Director or Vice President, up to and including the Chief Operating Officer) are expected to establish appropriate procedures and guidelines under this policy. These are expected to be published separately and stored appropriately in a location available to all who need access (e.g. SharePoint).

## 1.4 Definitions

“Lam” or “Company” refers to Lam Research Corporation and each of its subsidiaries.

## Our Core Values

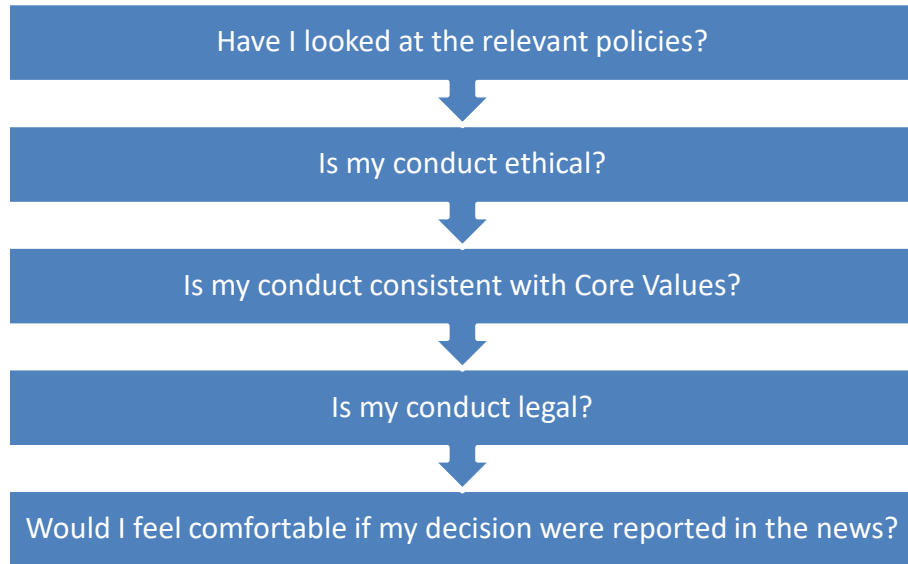
- Achievement
- Honesty and Integrity
- Innovation and Continuous Improvement
- Mutual Trust and Respect
- Open Communication
- Ownership and Accountability
- Teamwork
- Think: Customer, Company, Individual

“Policy” refers to these Global Standards of Business Conduct including any other Company policy referenced in these Global Standards of Business Conduct.

“You” or “your” refers to each person to whom this Policy applies.

### 1.5 Decision-Making Checklist

Because it is not possible to anticipate all situations that may arise, this checklist may help you navigate the difficult situations.



If you have not looked at the relevant policies, please review them before you proceed.

If you answered NO to any of these questions, do not engage in the conduct. If you are not sure about the answers to these questions, please ask the appropriate person (such as your manager, Legal, or Ethics and Compliance) for guidance.

If you answered YES to all the questions, you may proceed.

## 2 Our Relationship with Each Other

Our Company’s most important resource is our people. We are committed to fostering a work environment that is safe, professional, and where employees have the opportunity to reach their full potential.

### 2.1 Fair Employment Practices

We are an equal opportunity employer. Our Company is committed to equal opportunity in employment and non-discrimination in employment

## Safety Example

**Q.** I have a safety concern, but I am worried that if I mention it, it could slow down the production and we can miss our customer's deadline. What should I do?

**A.** Although deadlines are important, health and safety come first. Please raise concerns immediately, even if it means slowing down production or missing a deadline.

## Personally Identifiable Information

Examples include social security number, date of birth, citizenship, gender, ethnicity, passport number, residential address and phone number, driver's license information, educational information, family circumstance, employee ID number, and photograph.

policies, practices and procedures on the basis of any category protected by applicable laws. As members of our workforce, you are responsible for upholding these standards and complying with these Company policies. For more information, please refer to our Global Employment Policy.

### 2.2 Anti-Harassment

We are committed to providing a work environment that is free from harassment, whether verbal, physical or environmental. As members of our workforce, you are responsible for upholding these standards and complying with our anti-harassment policies.

### 2.3 Combating Trafficking and Forced Labor

We are committed to fair and humane employment practices, and do not tolerate forced, bonded, or indentured labor. We do not use workers under the age legally permitted. As members of our workforce, you are responsible for upholding these standards and complying with our Global Employment Policy.

### 2.4 Workplace Health and Safety

We work to ensure a safe work environment for our employees and others by complying with applicable laws and regulations relating to safety and health in the workplace. In day-to-day operations, we integrate safety and health into design, manufacturing, installation, use, maintenance and service of products; and we make safety a top priority.

We do not tolerate threats, threatening behavior, or acts of violence against employees, contractors, or visitors.

As members of our workforce, you are responsible for upholding these standards and complying with our EHS Sustainability and Commitment Policy and Global Security Work Place Violence Policy.

### 2.5 Protecting Employee Information

We respect the privacy and confidentiality of our colleagues' personally identifiable information. Personally identifiable information generally refers to information maintained by Lam that is identifiable to a specific employee. We maintain only those employee records required for business, legal or contractual reasons, and limit access to and knowledge of those records to people who need the information for legitimate purposes.

As members of our workforce, you have a responsibility to secure and maintain the confidentiality of any personally identifiable information that you access. For more information, please consult your Human Resources representative.

## Examples of Confidential Information

- Non-public technical data, trade secrets, and other non-public intellectual property
- Tool performance data
- Unannounced products or marketing plans
- Recipes, formulas, drawings, or software developments
- Non-public financial information, including shipment, revenue, margin, product and other cost information, and forecasts
- Employee information such as organization charts and salaries
- Customer and supplier confidential information

## 3 Our Relationship with the Company

Safeguarding Lam’s assets is critical to our Company’s success. As members of our workforce, you have a duty to use the Company’s assets only for legitimate business purposes, to protect them from unauthorized use or loss, to keep them confidential as appropriate, and to never use Lam assets for any unlawful or improper purpose.

### 3.1 Protecting Confidential Information

Each year, Lam invests a substantial portion of its revenues in research and development. One way Lam protects that investment is to maintain the confidentiality of its information. Technological information is not the only information that should be kept confidential, however. Disclosure of ANY non-public information, including Lam’s financial performance, business plans, and customer or supplier information can cause Lam substantial damage.

Take appropriate security measures to protect confidential information in the following ways:

- Carefully review and comply with our policies regarding confidential information, including our Data Security Policy and Data Security Procedure;
- Consider your audience whenever communicating anything relative to Lam, your customer, or other third parties;
- Review messages and attachments prior to sending them to prevent unintended dissemination of confidential information; and
- Hold all confidential or proprietary information in strictest confidence at all times during the term of your employment or services to Lam and thereafter.

#### 3.1.1 Lam’s Confidential Information

We safeguard our Company’s confidential information. Before sharing any confidential information with an outside party, in writing or orally, make sure an appropriate Non-Disclosure Agreement (NDA), approved by Legal, has been executed.

An NDA is a legal agreement that describes how a person, group or company, must handle information disclosed to them by another person, group or company. NDAs usually have a narrow scope of coverage. The NDA should cover the disclosure you wish to make, and have the proper restrictions on the other party’s use of the confidential information.

## Intellectual Property

Intellectual property includes many things, such as trademarks, copyrights, trade secrets, know-how, inventions, ideas, and patents.

If an existing NDA does not appropriately cover the information, refrain from disclosing such information until an appropriate NDA is put in place. In addition, any marking and notification requirements set forth in the NDA should be understood and followed to afford our Company the full protection of the NDA.

### 3.1.2 Confidential Information of Others

Just as we safeguard Lam's confidential information, we must also safeguard the confidential information of third parties. You must treat the confidential information of third parties in accordance with the law, contractual agreements with such third parties, and the highest business standards.

Make sure a signed NDA approved by Legal is executed before exchanging confidential information with third parties. If you obtain third party confidential information pursuant to an NDA, be sure to comply with the terms of that NDA.

Customer Information. In relation to our customers, information that belongs to our customers which is not intended for public distribution is generally considered customer confidential information. This information may or may not have been disclosed under an NDA. In addition, our customers' contracts may specifically preclude us from mentioning that they are our customers. You must follow the confidentiality requirements specified by our customers.

Follow the procedures for classification and handling of customer information in our Data Security Policy and Data Security Procedure.

Competitor Information. In relation to our competitors, we want to compete with them fairly, and do not want their confidential information. Be very careful when you are having conversations with people who work for competitors, to avoid receiving *any* confidential information.

If you obtain information regarding our competitors, you must do it legally and ethically by:

- Only using information from publicly available sources such as published articles and public records;
- Never misrepresenting yourself or using improper means;
- Never seeking confidential information about other companies from peers or job applicants;
- Never bringing confidential information belonging to prior employers onto Lam premises or systems, or using confidential information from prior employers;

- Clearly indicating that you do not want competitors' confidential or proprietary information, and that they should share information only if they are authorized to make the disclosure; and
- Never accepting or using any information that may have been improperly obtained.

If you come into possession of a competitor's confidential information, contact Legal immediately. The information should be returned or destroyed, and should not be distributed or analyzed.

Please be alert to the risk of receiving confidential information from customers or suppliers about our competitors.

Unauthorized use or disclosure of someone else's confidential information or trade secrets can result in civil and criminal penalties. Consult with Legal if you have any questions regarding the use or disclosure of confidential information.

For more information, please refer to our Data Security Policy, Data Security Procedure, Trade Restricted Individual (TRI) Access to Technical Data Policy.

### 3.2 Protecting Intellectual Property Rights

Lam's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among our most valuable assets. The intellectual property that we generate at Lam contributes to Lam's success, and each of us has a duty to protect these assets from unauthorized disclosure or misuse. Be careful to ensure that Lam's name is not used to endorse third party products and services without authorization, and obtain approval from our Corporate Communications Department prior to any use of our trademarks and logos.

We also honor the intellectual property rights of third parties, and protect their confidential information from unauthorized use and disclosure. Inappropriate use of intellectual property of others may expose Lam and members of our workforce to civil and criminal penalties.

In addition, we comply with the copyrights for software on our computers and on network computer storage areas under our control. Do not copy, install, or otherwise use software in a manner that violates either the license agreement for that software or copyright laws. Obtain the Chief Information Officer's approval before installing software that has not been pre-approved by our Information Technology Department.



## Using Lam's Assets

Lam's assets include equipment, such as copiers and telephones; computer hardware, software, networks, e-mail and Internet access; other property we store on Company's premises (such as our work files and other documents); and the time and skills of our personnel during work hours.

### 3.3 Ensuring Financial Integrity and Responsibility

Each of us has a role in making sure that the money we spend on behalf of Lam is appropriately spent, and that our records are accurate and complete. This includes all aspects of our financial integrity, from how we spend our money, to our accounting practices, and our dealings with third parties.

#### 3.3.1 Accurate Accounting Practices

We ensure the accuracy and completeness of our records. As members of our workforce, you must:

- Accurately and truthfully prepare any reports required by our Company (examples are expense reports, time cards, and sales and manufacturing reports).
- Execute transactions in accordance with our financial policies.
- Not engage in any transactions or establish any undisclosed accounts to acquire, retain, or dispose of Company assets without proper recording and disclosure in our financial systems.
- Not make any false or misleading entries, or provide information that would lead to such entries being made, in our books and records, for any reason.
- Not make any payment regardless of form on Lam's behalf without adequate supporting documentation, or for any purpose other than what is described in the documents.
- Obtain the necessary reviews and approvals, and ensure you are properly authorized according to our Signature Authorization Policy, before you sign contracts, including NDAs; approve transactions; or access, write off, or reserve Lam funds or assets.

For more information, please refer to our financial policies including our Signature Authorization Policy.

#### 3.3.2 Retaining Records

We maintain and destroy records in accordance with our records retention policies, and you are expected to maintain records as required by our policies. Legal may also ask you to retain certain records for legal or auditing purposes. This may come in the form of a "Legal Hold" notice not to destroy certain records. You must comply and preserve all electronic and hard-copy records described in the Legal Hold, including e-mails, drafts, and duplicates, until you receive further instructions from Legal. If you become aware of a government investigation or litigation involving Lam, do not discard or delete records related to the subject matter. Contact

Legal immediately.

For more information, please refer to our Global Records Management Policy and Global Records Retention Schedule.

### 3.4 Using Lam's Assets and Communications Systems Responsibly

Lam gives us the tools and equipment we need to do our jobs effectively, but counts on us to be responsible and use these resources with good judgment and restraint. Personal use of Company property is secondary and only acceptable when it does not interfere with your job and does not violate Company policies. You must not direct the time or resources of Lam's personnel to your personal use.

You must comply with our Communications Systems Use Policy in utilizing Lam's communications systems whether you are onsite or accessing Lam's systems offsite. Do not use Lam systems in ways that are unlawful, unethical, or contrary to Company policies, such as transmitting threatening, obscene, harassing or discriminatory messages, distributing chain email, gambling, or gaming.

All data created, transmitted, received, or stored using any Lam communication system is and remains Lam property. Use of Company resources, whether in the office or at home, is not private. Lam reserves the right to review the content of all business communication systems, inspect its facilities, business documents, and offices, when it has an interest in doing so, consistent with applicable data privacy laws.

When using Company-issued mobile devices or personal mobile devices with access to Lam's communication systems and data, you must protect the confidential or proprietary information on the devices and use secure data management procedures. You are prohibited from storing any Company information on a personal mobile device, except within approved corporate data repositories and applications. Lam may require physical access to mobile devices for legitimate business purposes, such as to investigate allegations of policy violations or to implement a legal hold.

For more information, please refer to our Communications Systems Use Policy, Data Security Policy and Mobile Device Use Policy.

### 3.5 Avoiding Conflicts of Interest

A conflict of interest arises when our personal interests interfere with the best interests of Lam. Although you are generally free to engage in personal financial and business transactions, this freedom is not unlimited. You must avoid situations where (i) your loyalties may be divided between

**Receiving Gifts,  
Entertainment,  
or Business  
Courtesies**

Lam's interests and your own interests; (ii) your ability to perform your job would be impaired; or (iii) there is any appearance of a conflict of interest.

Conflicts of interest can be avoided or addressed if promptly disclosed. If you are in a situation in which there might be an actual or perceived conflict of interest, you must disclose it to the Chief Legal Officer (CLO) or Head of Ethics & Compliance, your manager (CFO or CLO if the CEO is making the disclosure), and any other persons specified in the LGL-41207 Conflict of Interest Procedure. You may not exercise your own judgment in these areas. Potential responses include: (i) that Lam has no present objection, subject to future review; (ii) the steps you must take to resolve the conflict to Lam's satisfaction; or (iii) that the activity is not permitted.

### 3.5.1 Accepting Gifts, Entertainment, and Other Business Courtesies

Exchanging business gifts, entertainment or meals of appropriate value is a customary business courtesy that can promote cordial working relations. However, you must avoid accepting gifts, entertainment, or other business courtesies that could create conflicts of interest. In all cases, the gift, meal, entertainment, or business courtesy must:

- Be consistent with accepted business practice,
- Comply with laws and ethical standards, and
- Not negatively reflect on Lam's image should it become public.

Our business partners' policies or their contracts with Lam may contain different requirements regarding gifts, entertainment, and other business courtesies. It is your responsibility to know and to comply with the applicable requirements.

See Appendix B of our Conflict of Interest Procedure for details.

### 3.5.2 Outside Employment or Associations

We do not engage in any outside employment that could lead to divided loyalties, or interfere with performance of our duties at Lam. Examples are listed in Appendix B of our Conflict of Interest Procedure. You must disclose all outside employment to your manager and to Legal.

If there is a question as to whether a company or person falls within the categories listed in Appendix B of our Conflict of Interest Procedure, you must also receive prior approval from your manager

## Outside Employment

Avoid taking a part-time job where you may be tempted to work on that job during your normal

and the CLO or Head of Legal for Ethics & Compliance.

### 3.5.3 Outside Directorship

Participating on the board of directors of other organizations may enhance your professional and leadership skills, but may also lead to conflicts of interest. If, as a board member at any organization, you encounter a situation that conflicts with Lam's interests, you should withdraw from participating in the situation or resign from the board. See Appendix B of our Conflict of Interest Procedure for required disclosures and approvals.

### 3.5.4 Personal Investment

While Lam encourages you to engage in financial planning, you and your family must avoid conflicts of interest, including a substantial financial interest, including securities, in Lam's customers, suppliers and competitors. See Appendix B of our Conflict of Interest Procedure for details.

### 3.5.5 Corporate Opportunities

We owe a duty to the Company to advance its legitimate interests. You may not use Lam property or information or your position at the Company for improper personal gain, or to compete with the Company, either directly or indirectly. Officers have additional obligations. See Appendix B of our Conflict of Interest Procedure for disclosure and approval requirements before you may participate in such opportunities, either directly or indirectly.

### 3.5.6 Relatives, Friends, and Related Parties

Conflicts of Interest can arise in situations where you may be conducting Lam business with a Related Person, or where an employee's employment or position may be directly or indirectly influenced by a relative or another employee with whom there is a close personal relationship, such as in a supervisor-subordinate relationship. See Appendix B of our Conflict of Interest Procedure for required disclosures and approvals.

## Fair Competition

**Q:** What should I do if a competitor starts discussing prices or other sensitive topics with me?

**A:** If a competitor begins to discuss product prices, terms of sale, allocation of markets or other prohibited topics, you must not participate. If such discussion is not stopped, you must leave the meeting immediately, and document it by informing Legal.

## 4 Our Relationship with Other Companies and Stakeholders

We operate in a global community with honesty and integrity, and seek business relationships based on trust and fairness. As a global company, we are committed to complying with applicable laws.

### 4.1 Trade Regulations

#### 4.1.1 Promoting Fair Competition

We are committed to competing vigorously, but fairly and honestly. In relation to our competitors, do not discuss, or reach agreements about, any of the following topics without prior Legal approval:

- Pricing (such as costs, discounts, promotions, or other terms and conditions of sales);
- Territories (such as division of territories, markets, or customers);
- Supply or Production (such as restricting or increasing supply, production, or services); and
- Boycotts (such as refusing to sell to or buy from particular individuals or entities).

In relation to our suppliers and customers, do not discuss or reach agreements about any of the following topics without prior Legal approval:

- Refusing to buy a product or service from a supplier unless the supplier agrees to buy a product or service from Lam;
- Requiring customers to take other Lam products or services as a condition of delivering their desired products or services;
- Selling a product upon the condition that the purchaser will not use or purchase a competitor's products; and
- Prohibiting a supplier from engaging in legitimate transactions with Lam's competitors or customers.

Please remember that a supplier in one market may be a competitor in another, which means conversations that are appropriate in the context of a supplier relationship may be inappropriate when discussions shift to areas of competition.

Antitrust laws are complex, and proven violations carry significant penalties and even imprisonment. Please consult with Legal early on if you have any questions.

## Trade Controls

Exports include tangible transactions (i.e., physical shipments) and intangible transactions (i.e., electronic transmissions of software or technology, access to information by a foreign national, or similar disclosures).

## Giving Gifts or Business Courtesies:

Ask yourself:

- Am I giving the business courtesy to influence them?
- Would the business courtesy appear to influence their objectivity?
- Does the business courtesy appear to be more than moderate?
- Would I be embarrassed if the business courtesy were made public?
- Would giving the business courtesy violate our policies?

If the answer to any of these questions is yes, consult with your manager or Legal.

### 4.1.2 Trade Controls

We comply with all applicable export and import control laws and regulations. Trade control laws have global reach and govern access to Lam’s products, services, information, software, and technology by other countries or foreign nationals. We obtain all appropriate export and re-export authorization for our global business.

If you work in a product category that may involve what the government defines as “controlled technology,” you may be restricted from exporting that technology. This means Lam must obtain the appropriate export authorization prior to sharing this “controlled technology.” For more information, please refer to Trade Compliance Management Policy and related policies.

We also comply with the laws of the countries into which we import products. These laws typically require that we accurately describe, classify, and value the imported goods, and declare their country of origin.

For more information, please refer to Trade Compliance Management Policy and related policies, and consult with Foreign Trade.

### 4.2 Giving Gifts, Entertainment, and Other Business Courtesies

In all cases, giving or providing gifts, entertainment, or other business courtesies must be consistent with accepted business practice, comply with law and ethical standards, and not negatively reflect on Lam’s image should it become public.

*Gifts.* Advertising novelties or gifts of moderate value (nominally U.S. \$100 or less) are generally appropriate. In rare circumstances where local custom may call for an exchange of gifts having greater value, approval from the OCEO Staff Member in your management chain is required before such a gift may be offered. Cash or cash equivalents such as gift cards, payments, or loans may never be offered. This restriction includes cash gifts for special occasions such as weddings and funerals. You may not give gifts from Lam funds or personal funds in violation of this policy. Exceptions to this policy require approval by the CEO or COO, and the CLO or Head of Ethics & Compliance.

## Preventing Bribery

Some Warning Signs to Watch for When Working with Third Parties:

- Unusual payment patterns
- Lack of details in the transaction
- Unusually high commissions or contractor fees
- Relationship with government officials
- Lack of knowledge or experience in the service they are providing to the company
- Vague description of fees or expenses
- Unusual or false receipts or invoices

Countries have different rules that limit our ability to give gifts and business courtesies to government officials. Before you give gifts or other business courtesies to government officials (including employees of state-owned or state-controlled entities), consult with Legal.

Meals and Entertainment. You must exercise good business judgment in providing business meals and entertainment. Infrequent and customary business meals for the express purpose of furthering a business relationship are appropriate. If the meal or entertainment is frequent or more than moderate, obtain written approval from the OCEO Staff Member in your management chain prior to extending the invitation.

Travel. Payments of reasonable business travel expenses incurred by third parties require compliance with Lam travel policies including Global Travel Policy and Global Corporate Charge Card and Expense Reimbursement Policy, as well as proper invoicing and appropriate documentation to substantiate the charges.

Personal Benefits, Discounts, or Commissions. Do not pay commissions or other compensation to customers (or their employees, family members or associates) or provide items for their personal use. Similarly, you may not pay such compensation or personal benefits to individual employees, family members or associates of suppliers.

Documentation. You must comply with our Company's expense reimbursement procedures and properly document all expenses.

Government agencies and our customers may have policies or contracts with Lam that contain different requirements regarding gifts, entertainment, and other business courtesies. It is your responsibility to comply with the applicable requirements.

Please refer to the following Preventing Bribery and Corruption section for special rules.

### 4.3 Preventing Bribery and Corruption

We do not engage in any form of bribery or corruption, whether it is commercial or governmental bribery. You must follow these guidelines:

- Never offer, promise, or give anything of value to anyone to improperly influence a business decision;
- Never offer or accept bribes;
- Never use or permit others to make or receive improper payments or anything of value that you could not legally or ethically do;
- Comply with Lam's restrictions on giving and accepting gifts, entertainment, and other business courtesies;
- Accurately and completely record all expenses; and
- Avoid making facilitating payments, which are payments to individual government officials to expedite or facilitate routine government action such as processing permits (as opposed to scheduled expedite or similar fees that are paid to the government

## Insider Trading

Material, non-public – or “inside” – information is information not generally known to the public, that a reasonable investor would consider important in deciding whether to trade in that company’s securities.

agency).

With the exception of regulatory fees and other legally required charges, you may not offer or make any payments to any government official from Lam or personal funds. If you believe local custom dictates the payment of a nominal sum to induce an official to perform an act he or she would be required to perform anyway, you must consult with your manager, and only the CLO or Head of Ethics & Compliance may grant exceptions.

### 4.4 Environmental, Health, and Safety

We are committed to the sustainable management of Environmental, Health, and Safety (EHS) as a core business principle. We comply with applicable government standards and regulations, and provide a safe and healthful workplace while reducing our environmental footprint. We integrate good health, safety and environment practices into all aspects of our businesses, including products we design and services we provide.

As members of our workforce, you are responsible for upholding these standards and complying with our EHS Management System Manual and related policies.

### 4.5 Insider Trading

We support a fair and open securities market. Do not trade in the securities of Lam when you have material, non-public (“inside”) information, and do not disclose inside information to anyone outside Lam, including family members and friends. If you have inside information about other companies you learned through your work at Lam, do not trade in those companies’ securities either. You can be found responsible for trades by family members and friends if you provided them with inside information relating to the company in which they traded. In addition, you may not engage in any short sales, hedging, or pledging in Lam’s stock, other than through Lam’s equity incentive plans or employee stock purchase plans.

For more information, please refer to our Insider Trading Policy and Insider Trading Policy Procedure.

### 4.6 Charitable Donations, Political Contributions, and Political Activities

You may not use Lam funds to make any donation or payment that is illegal, is contrary to Lam’s policies or would negatively impact or cause embarrassment to Lam or any of its officers or employees. Note, the *Global Signature Authorization Policy* and the corresponding *Procedure* apply to business and marketing related expenditures and not to



## Donations

The Lam Research Foundation is the principal organization for making charitable donations on behalf of the Company.

Do not solicit charitable donations from suppliers, vendors or other third parties. If you are a manager, do not ask your reports to make donations as this may create a sense of obligation or create undue pressure on them to contribute.

## Public Communications

Do not discuss material non-public information with brokers, analysts, expert networks, other members of the investment community. Please direct all inquiries to Investor Relations.

philanthropic or charitable activities which must follow these Global Standards.

### *Charitable Donations*

Lam Research is committed to positively impacting communities around the world by supporting programs that share our Core Values. Through the Lam Research Foundation, the company contributes to local, national, and international organizations that improve people's lives with an emphasis on education, particularly in math, science, and engineering.

The Lam Research Foundation is the principal organization for making charitable donations on behalf of the Company. All charitable donations, including sponsoring charitable events, university grants, fellowships and scholarships through the Lam Research Foundation must follow the process set forth in the Lam Foundation's Guiding Principles. The donation of Lam equipment is outside of the Lam Research Foundation's scope and is subject to the Equipment Donation process.

University research donations may be made directly from Lam corporate funds and are managed by the Office of the CTO. University research donations through Lam corporate funds are governed by the University Collaboration Guidelines.

### *Charitable Solicitations*

You may not, directly or indirectly, solicit charitable donations from suppliers, vendors or other third parties. If you are a manager, do not ask your reports to make donations as this may create a sense of obligation or create undue pressure on them to contribute.

### *Political Activities*

You may not use Lam funds or assets for political contributions unless there is an identifiable business need for such use, and such use is approved in advance by the CEO and Legal. Working for a political party or candidate as part of your duties or as a Lam representative is prohibited, as is pressuring fellow employees to make donations to political action committees, political parties, candidates, or causes.

## 4.7 Public Communications

As a public company, Lam has certain responsibilities regarding the public distribution of information, particularly to the investment community. Do not discuss material non-public information with brokers, analysts, expert networks, other members of the investment community, unless it is part of your job responsibilities. Please direct all inquiries to Investor Relations. In addition, do not discuss on social media confidential information of Lam and of the parties (such as customers and suppliers) that have shared their confidential information with Lam, including external social networks, corporate blogs, employee blogs, chat boards, Facebook, Twitter, LinkedIn, and other social media applications or websites.

## Ethics Contacts

You may reach the Helpline online or by phone:

**Website:**  
[www.lamhelpline.ethicspoint.com](http://www.lamhelpline.ethicspoint.com)

**Phone:**  
1-855-208-8578 from the U.S. (other numbers available on the website)

You may reach our Ethics and Compliance team directly by email:

[ethics@lamresearch.com](mailto:ethics@lamresearch.com)

For more information, please refer to our Fair Disclosure of Material Nonpublic Information Policy and Social Media Use Policy.

## 5 How We Uphold the Policy

### 5.1 Ethics and Compliance Team

The Ethics and Compliance team is a resource to:

- Provide guidance on how to apply this Policy or other Company policies to our business activities;
- Provide ethics and compliance training and communications; and
- Receive reports of and investigate actual or suspected violations of our Policy, Company policies, and the law.

The Ethics and Compliance team regularly distributes Ethics and Compliance Bulletins (“Bulletins”). These Bulletins contain examples based on questions or concerns our employees have expressed and represent situations in which you may find yourself. Please feel free to use them in your staff meetings, training sessions, and similar meetings. If you have any questions or suggestions for a future topic, please email Ethics and Compliance at [ethics@lamresearch.com](mailto:ethics@lamresearch.com).

Past Bulletins are located on **SharePoint**. You can also view past bulletins by visiting the Point, selecting the Legal Department, and accessing the Ethics and Compliance page.

### 5.2 The Ethics Helpline

As part of our global Ethics & Compliance program, we have established an Ethics Helpline which you may contact at any time to discuss concerns or seek clarification regarding this Policy, other Company policies, or laws and regulations. Please raise your concerns or questions early. The earlier we know about an issue, the more likely it can be timely resolved.

When you contact the Helpline, it is helpful to identify yourself, because it enables us to follow up. But you may also report anonymously. Our Helpline is operated by an independent third party, and is accessible 24 hours a day, seven days a week. We will maintain confidentiality to the greatest extent possible.

You may also email our Ethics & Compliance team directly. Submissions are treated confidentially, but might not be anonymous.

## Asking Questions

Any time you have a question about whether an action complies with our Policy, please seek advice. Depending on the situation, you may seek advice from your manager, HR, Legal, or Ethics and Compliance.

## Safe Reporting

We strive to promote and foster a Speak Up culture and a safe reporting environment. We encourage you to speak up if you suspect a possible violation of our policies. Retaliation against reports made in good faith is strictly prohibited.

### 5.3 Compliance

We comply with the laws and regulations in each country where we operate. If laws and regulations in the country you are in, or Lam's contracts with third parties, are more restrictive than this Policy, you must comply with the applicable laws or contracts. Because of the complexity of the global laws and regulations that apply to our business, this Policy provides only general guidance. Please review specific Company policies and procedures that may apply and consult with Legal if you have any questions.

Deviations from this Policy require approval from the CEO or COO, and from the CLO or Head of Ethics & Compliance.

Violations of the Policy are subject to discipline, up to and including termination of employment.

### 5.4 Investigations, Litigation, and Other Legal Matters

If you become aware of a dispute, investigation, or litigation, contact Legal promptly. You are required to cooperate fully with all internal investigations and audits, and to work with Legal to respond to litigation or requests from the government and other external agencies. Internal investigations should not be discussed with anyone unless instructed to do so by the investigator.

### 5.5 Asking Questions and Reporting Concerns or Violations

Each of us has an obligation to report potential or actual violations of the law, this Policy, and other Company guidelines. If you observe or otherwise become aware of a violation, you must notify your manager, Human Resources, Legal, or Ethics and Compliance as soon as possible.

### 5.6 Safe Reporting

We are committed to a safe reporting environment, and will not tolerate retaliation against anyone who, in good faith, discloses actual or suspected violations or participates in our investigation. You will also not be liable under any U.S. trade secret law for disclosing a trade secret in confidence: (a) to a government official or an attorney, provided that it is solely for the purpose of reporting, investigating or filing a lawsuit under seal for a suspected violation of law (including retaliation), or (b) in a legal proceeding document, provided it is filed under seal.