



**Lam Research Corporation**

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**Lam Research International Sàrl**  
**Slavery and Human Trafficking Statement**  
**for fiscal year ended June 27, 2021**

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 27, 2021 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 Environmental Social Governance 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 Global 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 protection of internationally proclaimed human rights. Through our compliance activities and efforts, we attempt to 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 its business operations and throughout its supply chain.

In the fiscal year ended June 27, 2021, we continued to require certain suppliers to respond to the Slavery and Trafficking Risk Template ("STRT"). To improve due diligence, the survey focused on suppliers with operations in high risk geographical areas. During the 2021 fiscal year, we increased the STRT completion rate to 77% (or 136) of the suppliers in scope from 56% in the prior year. After an analysis of the results, which included further supplier confirmation of their responses, we identified 9 suppliers that were high risk for forced labor and human trafficking. We implemented corrective actions plans for these suppliers which include assigned training on forced labor topics and requests for suppliers to update company employment policies. A supplier's continued failure to complete the corrective actions requested or deficiencies identified by Lam Research may be grounds for Lam to take actions, including ceasing doing business with that supplier.

The steps that Lam Research has taken include the following:

1. Verification. In order to verify prospective direct product suppliers, we require 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 team.
2. Auditing. We periodically audit major direct 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. The audit includes interviews with the supplier's manager or Human Resource personnel and one of the supplier's workers on issues of forced labor and modern slavery. During the 2021 fiscal year, 21 supplier audits were completed. Onsite auditing was impacted during the 2021 fiscal year due to COVID-19 travel restrictions and, as a result, 12 of the audits were conducted via teleconference. These 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 it is doing business. 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 7.0, which was in place during the 2021 fiscal year.
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. As mentioned above, we assigned training courses to the 9 suppliers identified as high risk for human trafficking. These courses were provided by the Responsible Business Alliance and include topics on forced labor and responsible recruitment programs. We continue to require annual training of Lam Research 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. During the 2021 fiscal year, 269 employees completed this training.

Signed on behalf of the managing officers of Lam Research International Sàrl.

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Robert Stecher, Chairman

\*Revision date: December 13, 2021