



# Innovation with *integrity*

CODE OF CONDUCT



# A message from Tim Archer

Lam Research was built on a foundation of innovation with integrity, a principle that has successfully guided us for more than 40 years. We are a values-led organization that conducts itself with the utmost respect for our employees, customers, suppliers, and shareholders, and in compliance with the law.

As we work to drive semiconductor breakthroughs that will define the next generation of technology, our decisions are guided by our Core Values. These are not just words on a page, but are ingrained in our company culture — trust, accountability, and teamwork are the principles that allow us to deliver best-in-class solutions for our customers.

Our Code of Conduct is the underpinning of that culture, and we expect all our employees to become familiar with our policies, procedures, and principles. These are standards that are applicable to every person at Lam, no matter their job or their location. Each of us has a mandate to do their job with honesty, open communication, inclusiveness, and mutual respect with the people with whom we work.

At Lam, we know that true innovation never happens in a silo. The achievements we make happen through collaboration, precision, and a commitment to doing business the right way. Through our [Ethics Helpline](#) and other reporting options, we encourage our employees to ask questions or seek clarification on any of our policies and procedures, and we provide them with confidential avenues to speak up when they see something that might not adhere to our principles.

We are committed to ensuring employees at Lam operate with a deep sense of purpose, ethics, and individual accountability. This is how we build trust with all our stakeholders. We know that how we conduct ourselves is just as important as the products we create. To achieve our ambitious goals for the future, we must always execute with agility, transparency, and above all, honesty.

Thank you for everything you do for Lam.

A handwritten signature in black ink, appearing to read 'Tim M. Archer', written in a cursive style.

Tim Archer  
President & CEO

# Contents

## Our standards 5

- Innovation with integrity
- Our responsibilities
- Meeting our obligations
- Making ethical decisions

## Open communication 10

- Asking questions and reporting concerns
- What happens when I report a concern?

## Our people 13

- Fostering inclusion and diversity
- Preventing harassment and discrimination
- Keeping workplaces safe and healthy
- Keeping our people secure

## Our customers and third parties 19

- Preventing bribery and corruption
- Giving and receiving gifts, meals, travel and entertainment

- Conducting global trade with integrity
- Competing honestly and fairly
- Gathering competitive intelligence
- Working with customers, suppliers, and business partners

## Our Company 28

- Avoiding conflicts of interest
- Preventing fraud and asset abuse
- Securing our physical assets
- Responding to external inquiries
- Using social media responsibly

## Our information 35

- Maintaining accurate records and accounts
- Prohibiting insider trading
- Securing information technology
- Protecting sensitive and proprietary information
- Safeguarding intellectual property
- Protecting personal data

## Our communities 44

- Meeting our ESG commitments
- Promoting environmental protection and sustainability
- Respecting human rights
- Contributing to our communities
- Participating in the political process responsibly

## Ethics and Compliance 51

- A message from Ava Hahn, Chief Legal Officer
- We're here to help
- Ethics Helpline reminder

### *Disclaimer*

Separate from this Code of Conduct, Lam Research has enacted a [Code of Ethics](#) in accordance with United States Securities and Exchange Commission requirements and the NASDAQ Stock Market Listing Rules.

# Our Mission and Values

## Our Mission

Drive semiconductor breakthroughs that define the next generation.

## Our Guiding Principles

- Think customer, company, and individual
- Be number one in customer trust
- Attract, retain, and develop the best talent
- Deliver best-in-class solutions
- Achieve financial goals to deliver shareholder value
- Act with purpose for a better world

## Our Core Values

- **Achievement**  
Sets aggressive goals and delivers results
- **Agility**  
Executes with speed, flexibility, quality, and purpose
- **Honesty & integrity**  
Is truthful, and exhibits the highest level of moral and ethical principles, always doing the right thing
- **Inclusion & diversity**  
Creates an environment where different backgrounds and perspectives are welcome, heard, and valued

- **Innovation & continuous improvement**  
Generates ideas and embraces change that make us better as individuals and as a company
- **Mutual trust & respect**  
Fosters genuine interactions with mindful consideration for others
- **Open communication**  
Speaks candidly, listens respectfully, and solicits feedback
- **Ownership & accountability**  
Takes responsibility, initiates problem solving, and delivers on commitments
- **Teamwork**  
Collaborates and cooperates to achieve common goals







# Our standards

# Innovation with integrity

The theme “innovation with integrity” describes how we should pursue our mission while staying true to our Core Values. The Code of Conduct (“the Code”) outlines how to do that, laying out the steps we should take in a variety of areas to help us innovate with integrity.

The Code is divided into nine sections. The first three sections discuss our mission and values, standards, and responsibilities, as well as how we navigate ethical decisions and report concerns. The next five sections focus on ethics and compliance risk topics as they relate to different stakeholder groups:

- Our people
- Our customers and third parties
- Our Company
- Our information
- Our communities

Each risk topic is divided into three subsections:

## What we do

A statement of our approach to the risk topic, which sets the expectation for how we should act with integrity.

## Why we do it

An explanation of why taking this approach exemplifies our values, while helping us achieve our purpose and mission.

## How we do it

How we should behave to meet our expectations.

The last section of the Code discusses the roles of our Ethics and Compliance (E&C) and Employee Relations (ER) teams and lists resources we can contact for guidance or to report a concern.



# Our responsibilities

Our Code applies to all Lam:

- Employees
- Temporary workers
- Contractors
- Consultants
- Interns

References to “Lam” or “Company” throughout the Code refer to Lam Research Corporation and each of its subsidiaries. Mentions of “our” throughout the Code refer to every Lam and Lam subsidiary employee and every individual listed above.

We are each responsible for following the Code. Each of us also must complete an annual online training course to review and reinforce the standards in the Code.

## Manager responsibilities

As leaders, managers are responsible for building a community around our Code and Core Values. They must:

- Be role models and reflect our Guiding Principles.
- Ensure their teams and employees act with integrity and respect.
- Encourage employees to come forward with questions and concerns.
- Enforce our Code, policies, and procedures each day.



# Meeting our obligations

---

We meet our obligations to our customers, business partners, communities, and each other by following the Code. We also must comply with Lam policies and procedures that are applicable to our jobs so that we conduct business in a legal and ethical manner.

The consequences of misconduct may be severe depending on the situation, up to and including termination. The consequences for misconduct might also include substantial fines and even prison time.





# Making ethical decisions

Our Code cannot cover all situations that may arise, but it does give us a framework to help us make ethical decisions. It also helps raise awareness of the ethics and compliance-related risks we may face on the job. We may encounter gray areas where it is hard to discern the best action to take. Ask yourself the following questions to help you navigate difficult situations.



## CAN we do it?

Does it comply with applicable laws, policies, and procedures?

## SHOULD we do it?

Is it ethical and does it uphold our Code and Core Values?

## Is it a GOOD idea?

Will it enhance our culture and business without compromise to our reputation?

If you answered yes to every question, you can proceed with confidence! If you answered no to any question, or are unsure, consult with your manager, [E&C](#), or the [Legal Department](#) (Legal) before proceeding.

A woman with long brown hair, wearing a black top, is smiling and gesturing with her hands as if in a meeting. A man is seen from the back, looking towards her. The background is a dark, blurred office setting.

# Open communication

# Asking questions and reporting concerns

We are not expected to memorize all expectations of us. But we are responsible for asking questions when we are unsure about something and reporting concerns about potential or actual violations of our Code, policies, procedures, or the law. We can ask questions or submit reports by:

- Using the [Ethics Helpline](#).
  - Website: [www.lamhelpline.ethicspoint.com](http://www.lamhelpline.ethicspoint.com).
  - By phone: 1-855-208-8578 in the U.S. ([numbers for other locations available on the website](#)). The [Ethics Helpline](#) is accessible through our external and internal websites. Interpreters covering over 75 foreign languages are available for phone submissions. Concerns may be reported anonymously, where allowed by law. All reports are treated confidentially.
- Contacting [E&C](#), [Legal](#), [HR](#), or [ER](#).
- Sending an email to the E&C inbox: [ethics@lamresearch.com](mailto:ethics@lamresearch.com).
- Sending an email to the ER inbox: [employee.relations@lamresearch.com](mailto:employee.relations@lamresearch.com).
- Contacting the Audit Committee:
  - Attention Board Audit Committee, P.O. Box 5010, Fremont, CA 94537-5010



# What happens when I report a concern?

Lam takes allegations of misconduct seriously. The appropriate team will conduct the investigation. You must cooperate fully with investigations. You should not discuss investigations with anyone unless instructed to do so by an investigator.

Lam encourages you to identify yourself when making a report. It helps with communication and follow-up. However, you have the option of remaining anonymous, where allowed by law. In any case, your identity will be kept confidential. The Company will share information only on a business need-to-know basis, and even then will share only the minimum information possible in order to still be effective.

## Zero tolerance for retaliation

Lam is committed to a safe reporting environment and encourages you to speak up if you suspect a possible violation of our policies, procedures, or laws. Lam does not tolerate retaliation against anyone who makes a report in good faith or participates in an investigation. Retaliation is a violation of our Code and will be treated as such.

## Waivers

Exceptions to the Code are rare. Waivers require approval of the Chief Executive Officer and the Chief Legal Officer or Chief Compliance Officer.

### LEARN MORE

[Reporting Concerns Policy](#)







# Our people

# Fostering inclusion and diversity

## What we do

We foster a diverse and equitable culture where every person feels valued, included, and empowered to achieve their full potential.

## Why we do it

Inclusion and diversity (I&D) are embedded in our Core Values because they are central to our Company. We know that people work together best when everyone feels included. We also know that innovation is fueled by different ideas and points of view, which emerge in teams that have diverse backgrounds and experiences. That's why I&D enable us to achieve our purpose — to unleash the power of innovation together for a better world.

## How we do it

We foster inclusion and diversity when we:

- Seek insight from every team member and value all perspectives.
- Listen to others with curiosity, mutual trust, and respect.
- Build our teams seeking diversity and inviting underrepresented groups to the table.
- Fully participate in I&D trainings and ask questions when we have them.

- Make reasonable accommodations to address the individual needs of every coworker to enable them to perform their job. This is inclusive of adjusting the workspace for mobility.
- Speak up for one another when we feel our views or the views of others are being disrespected.

### Think about it

Q

**My manager is annoyed at a pregnant coworker for requesting three months of paid parental leave. He complains about it frequently, and I can tell my coworker feels embarrassed. Is there anything I can do?**

A

*Yes! Speak up for your coworker so this gets addressed. Your manager's behavior is not acceptable or inclusive. Lam's Global Parental Leave Program generally provides up to six months of paid leave for birth mothers (this includes bonding leave), and up to four months of paid leave for other parents. Your manager should accommodate your coworker's needs and uphold her rights. If you don't feel comfortable speaking to your manager, report it to [ER](#).*

### LEARN MORE

[Global Employment Policy](#)  
[Our Workplace | Lam Research 2021 ESG Report](#)

# Preventing harassment and discrimination

## What we do

We foster a work environment that is built on mutual trust and respect, and free from harassment and discrimination.

## Why we do it

People are our most important resource. We work hard to cultivate a safe and professional workplace where everyone has equal opportunities to thrive. We do not tolerate any form of harassment or discrimination.



## What is harassment?

Harassment is any kind (verbal, physical, visual, or written) of unwanted conduct that humiliates, offends, or degrades another person based on their protected characteristic(s). These characteristics include, but are not limited to:

- Race
- Color
- National origin
- Religion
- Creed
- Sex (including sexual orientation, gender identity, or pregnancy)
- Age
- Disability (including physical and mental)
- Medical condition
- Ancestry
- Genetic information (including family medical history)
- Marital status

Harassment is prohibited by our [Global Anti-Harassment Policy](#) and, in some cases, may be illegal when it creates a hostile work environment or interferes with a person's ability to work. Regardless of whether the behavior rises to the level of illegal conduct, this kind of treatment goes against everything we stand for at Lam.

# Preventing harassment and discrimination (continued)



## What is discrimination?

Discrimination is treating someone unfavorably and unfairly based on their protected characteristic(s). Discrimination in the workplace can negatively and seriously impact someone's employment and is never acceptable at Lam.

## How we do it

We prevent harassment and discrimination when we:

- Respect our coworkers and treat one another with mindful consideration.
- Consider the impact our words and actions could have on others *before* we speak or act.
- Base employment decisions, including recruiting, hiring, promotion, work assignments, and compensation, solely on merit.
- Act consistently to address or report issues.
- Speak up when we see something wrong and report harassing or discriminatory conduct to ER at [employee.relations@lamresearch.com](mailto:employee.relations@lamresearch.com) or [online](#).

### LEARN MORE

[Global Employment Policy](#)

[Global Anti-Harassment Policy](#)





# Keeping workplaces safe and healthy

## What we do

We put health and safety first. We take steps to protect and promote every employee's well-being.

## Why we do it

Before we can tackle our goals, we need to feel safe, healthy, and ready to work. That's why at Lam, our physical, mental, and emotional well-being is a top priority. Each day, we take steps to ensure we work in safe conditions by following safety procedures, participating in trainings, and using risk controls.

## How we do it

We keep our workplaces safe and healthy when we:

- Follow applicable safety laws, regulations, policies, and procedures.
- Actively participate in safety trainings and ask questions when we are unsure about something.
- Communicate often and openly about safety procedures and precautions.
- Never tolerate threats, threatening behavior, or acts of violence.

- Screen contractor safety performance to ensure contractors meet our safety standards.
- Report violent or threatening behavior to a manager and [Security](#) immediately. In case of imminent danger, we should call [Security](#).

### Think about it

Q

**One of the safety valves in the lab where I work is leaking. The leak is very small and doesn't seem to be a problem. Should I do anything?**

A

*Yes. You should report the leak immediately so it can be stopped. Use the phone number on the [Lam emergency reporting page](#). It is vital to act fast. Chemicals and other hazardous substances can be highly dangerous to people and the environment.*

### LEARN MORE

[EHS Policy](#)

[Global Security Work Place Violence Policy](#)

# Keeping our people secure

## What we do

We protect our people by securing our facilities and preventing violence.

## Why we do it

Each of us should feel safe and secure in our buildings and facilities. We need to work together to keep our workspaces secure by following safety procedures and staying vigilant. We should be on alert for dangerous situations and know what to do in case of emergency.

## How we do it

We keep our people secure when we:

- Allow only authorized people in Lam facilities.
- Are familiar with people who work in our areas.
- Escort visitors at all times and do not allow them to enter restricted areas.
- Report unsafe conditions, unusual behavior, and hazards immediately.

### Think about it

Q

I overheard one of my coworkers boasting at lunch about how he brings his handgun with him everywhere. Can he bring it into the building?

A

No. Weapons are not allowed on Lam property. Report this to [Security](#) immediately.

### LEARN MORE

[Global Security Work Place Violence Policy](#)





# Our customers and third parties

# Preventing bribery and corruption

## What we do

Our customers can count on us to act with honesty and integrity. We uphold our Core Values by not engaging in bribery and corruption.

## Why we do it

At Lam, our business strength comes from our commitment to honesty and integrity. Customers value our integrity and trust our products because of our actions. Corruption puts our Company at risk and can result in substantial fines and penalties. This is why we fight corruption.



### Working with government officials

Government officials are employees of local or national governments. They include employees of state-controlled or state-owned entities (SOEs). Employees of many of our customers in China are employees of SOEs and are considered government officials. We must take extra care when working with government officials. Countries have different rules that limit our ability to give gifts to these officials. Before we give business courtesies to government officials, we should refer to our [Gifts, Meals, Travel and Entertainment Procedure](#) and seek pre-approval from [E&C](#) and your manager when required.

## How we do it

We prevent bribery and corruption when we:

- Comply with corruption laws around the world, including the U.S. Foreign Corrupt Practices Act (FCPA) and U.K. Bribery Act 2010 and all applicable global laws and regulations.
- Never offer or accept bribes or anything of value in exchange for a business advantage or to improperly influence a decision.
- Never use, or permit others to exchange, improper payments or anything of value on our behalf.
- Do business with suppliers and business partners who commit to operating with integrity at all times and who comply with Lam's [Global Supplier Code of Conduct](#).
- Never offer or make payments to a government official with Lam or personal funds. This includes facilitating payments, but does not include regulatory fees and other legally required charges. If we believe local custom dictates a nominal payment, we must consult with [E&C](#).
- Never engage in money laundering or other illegal activity. Money laundering is when companies try to hide criminal money through legitimate business transactions. We monitor our suppliers and third parties to ensure they operate with integrity and stay vigilant to signs of illegal activity.



# Preventing bribery and corruption (continued)

- Follow Lam guidelines on giving and receiving gifts, meals, entertainment, and other business courtesies.
- Record all expenses accurately and completely.
- Contact [E&C](#) if someone tries to solicit a bribe from us or offers a kickback.



## Red flags

There are warning signs to watch for when working with third parties, which may indicate illegal activity such as bribery, money laundering, or terrorist financing. Examples of warning signs are:

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



## What counts as an improper payment?

**Bribe:** Anything of value offered to gain an unfair and improper business advantage. If the bribe is offered but not actually paid, it still counts as a bribe.

**Kickback:** A form of bribe paid to someone for facilitating a transaction or in return for favorable treatment.

**Facilitation payments:** Also known as “grease” payments, these are payments to government officials to expedite routine government actions, such as clearing customs or securing permits.

## Think about it



**A government official in another country is helping me get a permit for building a new facility. The official told me he could speed up the process if I gave him a little extra incentive. I think he’s asking for a facilitation payment. What should I do?**



*Facilitation payments are illegal in many countries, and we do not tolerate them anywhere we operate. Report this to [E&C](#) right away.*

## LEARN MORE

[Global Anti-Bribery and Corruption Policy](#)

[Gifts, Meals, Travel and Entertainment Policy](#)

[Gifts, Meals, Travel and Entertainment Procedure](#)



# Giving and receiving gifts, meals, travel and entertainment

## What we do

At Lam, we strive to be number one in customer trust. Professional relationships sometimes involve exchanging modest gifts, meals, travel, and entertainment (GMTE) to build goodwill.

## Why we do it

In the normal course of business, we may have opportunities to offer or accept GMTE from customers or suppliers. We must never exchange GMTE that could be viewed as affecting our ability to use fair judgment. If we accept or give extravagant GMTE, it could influence, or appear to influence, judgment. We act with integrity by avoiding even the appearance of unobjective decision-making.

To uphold our reputation, we follow our policies and procedures, customer and other third-party policies, and the law when it comes to exchanging business courtesies.

## How we do it

We give and receive GMTE responsibly when it is:

- **Moderate:** It follows the limits and requirements outlined in our GMTE procedure.
- **Reasonable:** It is infrequent, not excessive, and for a business purpose.

- **Compliant:** It complies with our GMTE Policy and Procedure.
- **Legal:** It complies with all applicable laws. It cannot create the appearance of attempting to influence decision-making or the need to return a favor.

We must also:

- Never give or accept cash or cash equivalents, such as gift cards, payments, vouchers, or loans.
- Not exchange GMTE during active contract negotiations.
- Not pay for third-party travel expenses or accept payment for travel from a third party without pre-approval from [E&C](#). We must follow the [Global Travel Policy](#) and [Global Corporate Charge Card and Expense Reimbursement Policy](#).
- Exercise sound judgment when choosing a venue or accepting an invitation for GMTE. Locations which offer adult entertainment or inappropriate services are never acceptable.
- Document business expenses fully and accurately, including submitting accurate expense reports.
- Follow our business partners' requirements regarding GMTE.
- Ask our manager and E&C for [pre-approval for GMTE](#) that has a higher value than our limits, such as for meals with customers.

# Giving and receiving gifts, meals, travel and entertainment (continued)



## Employees of governments and SOEs

Special rules apply to giving business courtesies to government officials and employees of SOEs. An acceptable gift for a commercial business partner might be problematic for a government official. We must contact E&C in advance of GMTE if we have questions about an exchange with government officials or SOE employees, or if we are unsure if we are working with government officials or SOE employees, as it may not be obvious. We must also seek pre-approval from E&C when required.



## Giving GMTE

Ask yourself:

- Am I giving the GMTE to influence them (making them feel they need to return the favor)?
- Would the GMTE appear to influence their objectivity or my own?
- Does the GMTE appear to be more than moderate?
- Would I be embarrassed if the GMTE were made public?
- Would giving the GMTE violate our Company's or our business partners' policies or procedures?

If the answer to any of these questions is yes, consult with E&C before proceeding.

## Think about it

**Q**

**A former supplier offers me lunch every few weeks to build our business relationship. They prefer to eat at a very expensive restaurant. I recently learned that I will be selecting a supplier for a new project and that this supplier is bidding on it. What should I do?**

**A**

*Report this to [E&C](#) immediately. Infrequent and moderate meals are usually fine, but frequent and extravagant meals could be seen as an attempt to influence your judgment and you should not have accepted them. You should not be involved in the bidding process for this new project. The next time a supplier offers you a meal, consult the [Gifts, Meals, Travel and Entertainment Procedure](#) to ensure you comply with the limits on accepting entertainment.*

## LEARN MORE

[Gifts, Meals, Travel and Entertainment Policy](#)

[Gifts, Meals, Travel and Entertainment Procedure](#)

[Global Anti-Bribery and Corruption Policy](#)

[Global Corporate Charge Card and Expense Reimbursement Policy](#)

[Conflict of Interest Procedure](#)

[Global Travel Policy](#)



# Conducting global trade with integrity

## What we do

Our approach to business everywhere is the same — we act with integrity and follow the law.

## Why we do it

As a company, we have a significant global impact. Virtually every leading-edge device has been made using our equipment. Because we operate globally, we must follow the laws in every jurisdiction where we conduct business, including import and export laws and regulations, as well as Lam's policies and procedures covering these trade laws.

These laws govern access to and end use of our products, services, information, software, and technology by other countries or foreign nationals. Exports include tangible transactions (i.e., physical shipments of Lam systems and spare parts and tools) and intangible transactions (i.e., physical or electronic transmissions of software or technology, access to information, or similar disclosures).

## How we do it

We conduct business with integrity when we:

- Follow applicable import and export laws, including applicable U.S. laws and the laws of local countries into or out of which we import and export goods.

These laws typically require us to:

- Obtain appropriate export and re-export authorizations wherever we do business.
- Accurately describe, classify, and value imported and exported goods, and declare their country of origin.
- Maintain adequate visibility into the source of materials, inputs, and uses of our products when crossing international borders.
- Consult with [Global Trade](#) if we are unsure about the requirements for importing or exporting/re-exporting our products, parts, technology, and software.

### LEARN MORE

[Trade Compliance Management Policy](#)



# Competing honestly and fairly

## What we do

We win business through our innovative ideas, products, and fair dealings.

## Why we do it

At Lam, we welcome fair competition and the challenge it brings us. More competition means generating better ideas and creating breakthrough products for our customers. We are committed to competing vigorously, but fairly and honestly.

## How we do it

We compete honestly and fairly when we:

- Follow applicable antitrust and competition laws wherever we do business.
- Never discuss sensitive information about pricing, bidding processes, supply, or production with competitors without prior [Legal](#) approval.
- Never make illegal agreements with competitors to divide markets or boycott certain entities.
- Avoid using our market strength in any way that might unfairly harm competition.
- Never discuss sensitive topics among multiple suppliers or customers who may be in competition with one another without prior [Legal](#) approval.

- Never reach agreements with suppliers or customers about these topics:
  - Refusing to buy from a supplier unless the supplier agrees to buy from Lam.
  - Requiring customers to buy other Lam products or services as a condition of delivering their desired products or services.
  - Selling a product with the condition that the purchaser will not purchase a competitor's products.
  - Prohibiting a supplier from engaging with Lam's competitors or customers.
- Ensure our product claims are accurate.
- Demonstrate mutual respect for our competitors by not making negative or false claims about their products or services.
- Ask [Legal](#) if we have questions about antitrust and competition laws, which can be complex.

### Think about it

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, do not participate. Stop the discussion or leave the meeting immediately. Report the issue to [E&C](#) or [Legal](#).*

# Gathering competitive intelligence

## What we do

We compete fairly by respecting our competitors' sensitive information and gathering competitive intelligence appropriately.

## Why we do it

Competitive intelligence is information we could use to develop our business strategies. It could relate to our industry or competitors and their products. We do business ethically by collecting competitive intelligence through legal methods. We respect our competitors and support fair competition.

## How we do it

We gather competitive intelligence properly when we:

- Obtain competitive intelligence legally through publicly available sources, such as published articles and public records.
- Never gather competitive intelligence through illegal means, such as:
  - Misrepresenting ourselves to a competitor.
  - Seeking sensitive information about competitors from peers, job applicants, suppliers, customers, or other means.

- Sharing sensitive information about prior employers with Lam.
- Are careful when speaking to employees from other companies to avoid accidentally sharing sensitive information.
- Send any competitor sensitive information we may inadvertently gain to the [Lam Competitive Intelligence mailbox](#). We must not discuss this information with anyone unless [Legal](#) confirms we may.

### Think about it

Q

I met someone at a conference who works for a competitor. She mentioned a new product they are developing that hasn't gone public yet. Can I share this with my team to inform our strategy?

A

This sounds like it may be competitor sensitive information. Report this to the [Lam Competitive Intelligence mailbox](#) and do not discuss it any further unless [Legal](#) confirms you may.

### LEARN MORE

[Data Security Standard](#)

# Working with customers, suppliers, and business partners

## What we do

Our customers, suppliers, and business partners help us innovate with integrity by upholding the same ethical principles that we do.

## Why we do it

We depend on suppliers and business partners for many aspects of our business. They are central to many of our processes, such as delivering our products to our customers. As a part of our team, they must reflect the principles and values we stand for as a company in their actions and operations.

## How we do it

We uphold our values while working with customers, suppliers, and business partners when we:

- Choose suppliers and business partners who can help us meet our business needs while also sharing our values.
- Hold suppliers and business partners accountable for following our ethical standards and Lam's [Global Supplier Code of Conduct](#).
- Monitor and manage supplier and business partner relationships over time. Their processes can change, and we need to ensure they still meet our standards.

- Treat them fairly and with respect no matter the length of the relationship.
- Watch out for red flags that could indicate a customer, supplier, or business partner is involved in illegal activity, and report any concerns to [E&C](#).

### Think about it

Q

**I am assessing potential suppliers for a business deal. One of the candidates is involved in an ongoing embezzlement lawsuit. Should that influence my decision?**

A

*Possibly. Our suppliers and other business partners must uphold our commitments to integrity and the law. It may be difficult to tell at this stage whether the supplier has engaged in wrongdoing. Consult with [E&C](#) before engaging a supplier accused of violating the law, as this relationship could also put our business and reputation at risk.*

### LEARN MORE

[Global Supplier Code of Conduct](#)



# Our Company

Lam  
RESEARCH



# Avoiding conflicts of interest

## What we do

We all have personal lives outside of Lam, but our decision-making at work should put our customers and Company first. When we avoid conflicts of interest, we can innovate without divided loyalty.

## Why we do it

A conflict of interest arises when our personal interests interfere with the best interests of the Company. Though we are generally free to engage in personal financial transactions, that freedom is not unlimited. We must avoid situations that could lead to a conflict between our interests and Lam's interests. We act with integrity and protect our reputation by avoiding even the appearance of a conflict of interest.



## How we do it

We avoid conflicts of interest when we:

- Are mindful of situations where our personal activities or relationships could impact our objectivity.
- Avoid outside work or activities that would conflict with our duties at Lam. This includes outside activities that could lead to divided loyalties, influence our judgment, cause us to misuse Lam information, or interfere with our work performance. For example, working for an expert network is strictly prohibited because of the increased risk of making an unauthorized disclosure of Lam's sensitive information. We must disclose any outside employment to our manager and [E&C](#).
- Disclose any intention to join another company's board of directors, and seek approval where required. If we encounter a situation that conflicts with Lam's interest while serving on an outside board, we must withdraw from the situation or board.
- Avoid substantial investments in Lam's customers, suppliers, business partners, and competitors. This also applies to our family members. This type of investment could impact our judgment on behalf of Lam, create the appearance of divided loyalty, or lead to a personal benefit.

## Avoiding conflicts of interest (continued)

- Do not use our position at Lam for personal gain. For instance, if a business opportunity arises through our work at Lam, we must disclose it first. Then we may be able to engage in the opportunity if Lam is not interested in it and with approval from [E&C](#).
- Disclose situations where we may work with or be in a position to hire someone with whom we are in a close relationship, whether it is a family, romantic, or other personal relationship.
- Promptly disclose actual or potential conflicts of interest to the [Ethics Helpline](#), [E&C](#), or [ER](#).

### Think about it

Q

Before I started working for Lam, I bought stock in Company A. They recently started working as a supplier for Lam. Is this a conflict of interest?

A

Possibly. Substantial investments in a Lam supplier are strongly discouraged and always require disclosure and approval by [E&C](#). Contact [E&C](#) for guidance on substantial investments in customers, suppliers, business partners, or competitors.

### LEARN MORE

[Conflict of Interest Procedure](#)

[Conflicts of Interest Created by Relationship Policy](#)



# Preventing fraud and asset abuse

## What we do

We follow our policies, procedures, and internal controls to prevent fraud and the abuse of Lam assets and resources.

## Why we do it

Each of us is responsible for ensuring that Lam assets are properly utilized and that our funds are accounted for and appropriately spent. This includes all aspects of our finances, from how we spend our money to our accounting practices and our dealings with third parties. We achieve financial goals to deliver shareholder value while upholding our financial integrity.

## How we do it

We protect our financial assets when we:

- Take steps to prevent their abuse, loss, or theft.
- Use Lam funds honestly, responsibly, only for legitimate business purposes, and in accordance with all finance policies and procedures, including our [Global Corporate Charge Card and Expense Reimbursement Policy](#) and [Global Approval and Signature Authorization Policy](#).

- Require adequate supporting documentation when we make any payments on Lam's behalf.
- Obtain the necessary reviews and approvals before signing contracts, approving transactions, or accessing, writing off, or reserving Lam funds or assets.
- Report any abuse or misuse of Company assets to [Internal Audit](#) or [E&C](#), and report theft to [Security](#).



### What are Lam's financial assets?

Our financial assets include among others:

- Cash and cash equivalents
- Investments
- Anything that can be converted to money

### LEARN MORE

[Global Corporate Charge Card and Expense Reimbursement Policy](#)  
[Global Approval and Signature Authorization Policy](#)

# Securing our physical assets

## What we do

We prepare for the next big breakthrough by taking care of our physical assets.

## Why we do it

Each day, we use physical assets to do our work. These assets include tools and pieces of equipment, from copiers to computers to our buildings and labs. We rely on these assets to do our work effectively and deliver results. We must protect our assets and use them with good judgment.

## How we do it

We secure our physical assets when we:

- Take reasonable steps to protect our assets from damage, abuse, waste, loss, or theft. For example, this includes locking up buildings, making sure visitors are properly checked in and escorted, and not leaving work laptops in cars or packing them in checked baggage.
- Keep our personal use of assets to a minimum.
- Take our assets off Lam property only when needed and approved.

- Wear our Lam badge at all times when we're in the office and make sure it is visible.
- Never allow unauthorized individuals to use Lam assets. This includes family members and friends.



### What are Lam's physical assets?

Our physical assets include:

- Inventory
- Property and equipment
- Raw materials
- Lab equipment and tools
- Copiers, printers, and telephones
- Office furniture
- Company-issued computers, laptops, and mobile devices
- Business documents and files

### LEARN MORE

[Use of Lam Identification Procedure](#)



# Responding to external inquiries

## What we do

We uphold our reputation and values by responding to external inquiries in a responsible and unified way.

## Why we do it

Customers trust that we act consistently and with integrity. We must do this in every interaction we have with the public regarding the Company. To uphold our reputation and act according to our values consistently, we must communicate to the public with one unified, truthful voice. That means we should direct all external inquiries to those employees authorized to speak on behalf of Lam.

## How we do it

We respond to external inquiries responsibly when we:

- Direct investor inquiries to [Investor Relations](#). We must not discuss material nonpublic information with brokers, analysts, expert networks, or other members of the investment community. Only [Investor Relations](#) can communicate with investors on behalf of Lam.
- Direct all inquiries from the media (including print, broadcast, social, or other media representatives)

to [Corporate Communications](#). Only [Corporate Communications](#) can communicate with members of the media on behalf of Lam.

- Do not disclose or discuss sensitive information on social media, at conferences, on customer sites, or in any public forum.
- Are careful not to create the impression we are speaking on behalf of Lam in personal communications (social media, blogs, etc.).

### LEARN MORE

[Fair Disclosure of Material Nonpublic Information Policy](#)  
[Social Media Use Policy](#)



# Using social media responsibly

## What we do

We harness the power of social media to connect and express ourselves while taking care to uphold Lam's reputation.

## Why we do it

Social media is an incredible tool for making connections around the world. It is a powerful, global innovation that helps us generate ideas, learn from others, and connect in seconds. While using social media, we must be careful to express our own thoughts without harming the Company. We cannot reveal sensitive information.

## How we do it

We use social media responsibly when we:

- Use social media minimally at work so it doesn't interfere with our responsibilities.
- Uphold our values while using social media, always remembering to treat others with respect and consideration.
- Never reveal sensitive information about Lam, customers, suppliers, or business partners on social media.
- Are cautious about posting on social media pictures or video taken at Lam sites. Some Lam sites, such as

Silfex, prohibit taking pictures or video with personal devices. Sensitive information, such as images of nonpublic items, may be inadvertently disclosed in these pictures.

- Clearly distinguish between our posts and those officially authorized by Lam. When we express personal opinions or make personal posts, we must not represent them as belonging to the Company.
- Identify ourselves as employees if endorsing Lam or its products. We may only make endorsements if we are authorized to do so.



### What counts as social media?

*Social media* refers to any type of online site or application that allows social networking and shared content.

Examples include:

- Social networking sites (Facebook, Twitter, LinkedIn, WeChat, TikTok, KakaoTalk, etc.)
- Corporate blogs
- Employee blogs
- Chat boards

### LEARN MORE

[Social Media Use Policy](#)

[Social Media Guidelines Procedure](#)

A man in a white shirt is looking at a tablet. Behind him is a wall with a grid of sticky notes. The image is dark and semi-transparent.

# Our information

# Maintaining accurate records and accounts

## What we do

We keep our records and accounts accurate, clear, and complete.

## Why we do it

Complete and accurate financial statements and business records enable us to make informed decisions and plans. They help build shareholder, customer, and business partner confidence in our Company. We live our Core Values of honesty and integrity by maintaining accurate records and accounts. Not only is it right for our business — it is simply the right thing to do.

## How we do it

We maintain the integrity of our books and records when we:

- Follow the internal controls and procedures that apply to our job as well as accepted accounting principles and applicable laws.
- Never skip an internal control, even if it saves time. Bypassing an internal control may seem harmless, but it could present big problems in the future.
- Prepare reports (including expense reports, time

cards, purchase requisitions, financial transactions, and sales and manufacturing reports) that are accurate, complete, and truthful.

- Accurately record all assets, liabilities, revenues, expenses, and transactions.
- Never set up or maintain secret cash funds or other off-the-record assets or liabilities.
- Maintain and destroy records in accordance with our records retention policy and schedule.
- Comply with “Legal Hold” notices and preserve all electronic and hard-copy records described in the Legal Hold, including emails, drafts, and duplicates, until we receive further instructions from [Legal](#).
- Retain records related to government or internal investigations. If we become aware of any investigation or litigation involving Lam, we must retain related records and contact [Legal](#) immediately.
- Do not engage in transactions that do not allow us to follow our policies and procedures. If a customer, supplier, or business partner ever asks us to engage in a transaction that requires us to dispose of a record without following our retention policy, that is a major warning sign. We must contact [Legal](#) if we receive such a request.



## Maintaining accurate records and accounts (continued)

### Think about it

**Q** My coworkers often lose files or throw them out before they're supposed to. I don't feel comfortable speaking up. What should I do?

**A** We encourage open communication at Lam, especially when an issue needs to be addressed, but you can make an anonymous report through the [Ethics Helpline](#) if you prefer. It is very important that we follow our records retention policy and schedule, so this is an urgent problem that should be reported.

### LEARN MORE

[Global Approval and Signature Authorization Policy](#)

[Global Records Management Policy](#)

[Global Records Retention Schedule](#)



# Prohibiting insider trading

## What we do

We support a fair and open securities market by prohibiting insider trading.

## Why we do it

In our work, we may learn information that is not known to the public and that an investor would consider important when deciding whether to buy or sell securities. This is known as “inside information.” Insider trading is when an individual uses this information for personal gain or to avoid a loss in the stock market, or tips another person to trade based on the information. This is a serious crime and is prohibited.

## How we do it

We prevent insider trading when we:

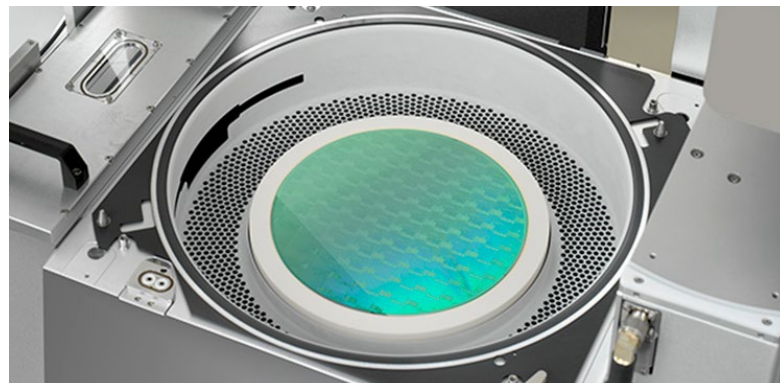
- Never trade in the securities of Lam or any other company with which Lam has a relationship of trust and confidence when we possess inside information about Lam or the company in question. We may trade on the second trading day following the day the information has been publicly disclosed.
- Do not disclose inside information to anyone outside Lam, including family members and friends.

- Share inside information within the Company only on a “need-to-know” basis.
- Do not engage in “tipping,” whether directly or indirectly. *Tipping* means passing inside information to someone who may use it to trade securities.
- Do not engage in short sales, hedging, pledging, or option trading involving Lam stock. In addition, we do not hold Lam stock in a margin account.
- Do not recommend that anyone buy or sell Lam securities.
- Do not discuss Lam’s business or prospects with research firms, brokers, analysts, investors, or expert networks.

### LEARN MORE

[Insider Trading Policy](#)

[Insider Trading Procedure](#)



# Securing information technology

## What we do

We are accountable for keeping our information technology safe and secure.

## Why we do it

Our information technology assets include all data created, transmitted, received, or stored on Lam communication systems. This information is critical to our everyday operations. We are accountable for the information technology we have access to. We must keep it secure so we can continue developing our ideas and business for years to come.

Our [Sensitive Information Protection Program \(SIPP\)](#) outlines how we should handle different types of information. We must know and follow SIPP to ensure we handle information properly.



Our data is classified in one of four ways:

- **No Label:** Information that does not need to be kept confidential to protect the interests of Lam or our business partners. Examples include charitable event communications and investor day presentations.
- **Confidential:** Information where public disclosure could harm Lam or a third party. It may be subject to a non-disclosure agreement (NDA). Examples include organizational structure and/or changes and third-party sensitive information.
- **Restricted — Internal:** Information that is restricted to Lam employees and authorized (NDA in place) contractors. Examples include drawings, build plans, pricing agreements, and the identities of our customers or suppliers.
- **Restricted — Specified Persons Only:** Information that has restrictions on use as stated in an NDA or other communications. Examples include merger and acquisition (M&A) activities and lab data.

The default label is *Confidential*. If we are unsure, we should keep the default *Confidential* label. More examples of each of these data types can be found in the [Data Security Standard](#).

# Securing information technology (continued)

## How we do it

We secure our information technology when we:

- Follow our [Information Security and Acceptable Use Policy](#) while using Lam's communications systems onsite or offsite.
- Do not use Lam systems in ways that are unlawful or unethical.
- Follow SIPP and other relevant policies and procedures to protect sensitive information from unlawful disclosure or abuse.
- Watch out for cyber threats when opening emails, links, and attachments.
- Do not store Lam data on personal mobile devices except within approved corporate data repositories and applications. Remember that Lam may need access to mobile devices for legitimate business purposes.
- Report suspected cyberattacks immediately to the [Global Service Desk](#).



### Think about it

Q

I received an email with a link asking me to reset my email password before it expires. I did not know my password expired, and I do not recognize this email address. What should I do?

A

Do not open the link! This could be a phishing attempt. Click the "Report Phishing" button in the email.

### LEARN MORE

[Information Security and Acceptable Use Policy](#)  
[Data Security Standard](#)  
[SIPP Overview](#)

# Protecting sensitive and proprietary information

## What we do

We put our sensitive and proprietary information to work helping us come up with best-in-class solutions. We must protect our information so we can continue delivering results.

## Why we do it

Each year, we invest a substantial portion of our revenues in research and development. One way we protect our investment is to maintain the confidentiality of our information.

Technological information is not the only information we should keep confidential. Disclosure of any nonpublic information (business plans, financial performance, and customer or supplier information) can cause substantial damage.

## How we do it

We protect sensitive and proprietary information when we:

- Review and follow our [Data Security Standard](#) and [Sensitive Information Protection Program \(SIPP\)](#). See the previous section, [Securing information technology](#), for more information.

- Protect others' sensitive information just as we safeguard our own. We follow the law and contractual agreements when handling customer, supplier, or other third-party sensitive information.
- Are careful not to reveal sensitive information when speaking to others about anything related to Lam. We need to think about who we are talking to and what they are authorized to know.
- Review messages, emails, and attachments closely before sending them to prevent accidental disclosure.
- Ensure outside parties sign an appropriate NDA before sharing sensitive information with them. The NDA should cover the disclosure and restrict use of the information. Contact [Legal](#) for additional information.
- Assign emails and attachments the proper sensitivity label. See our SIPP for more details.

### LEARN MORE

[Data Security Standard](#)  
[SIPP Overview](#)



# Safeguarding intellectual property

## What we do

We protect intellectual property, one of our most valuable assets.

## Why we do it

Our intellectual property rights are important assets. They enable us to innovate and deliver results. Each of us has a duty to protect them from unauthorized disclosure or misuse. We also act with integrity by honoring the intellectual property rights of our customers, suppliers, and other business partners, as well as competitors.

## How we do it

We safeguard intellectual property when we:

- Take reasonable steps to protect Lam's and others' intellectual property from unauthorized use and disclosure.
- Comply with copyrights for our computer software. We must not copy or install software in a way that violates copyright laws or the license agreement for that software.
- Use Lam trademarks or logos following brand guidelines and only with approval from [Corporate Communications](#).

- Request an information security review from the Chief Information Officer before installing new software that has not been pre-approved by Global Information Services (GIS).



### Examples of intellectual property

- Trademarks
- Copyrights
- Trade secrets
- Know-how
- Inventions
- Ideas
- Patents

### LEARN MORE

[Intellectual Property Group](#)  
[Information Security Policy Exception Procedure](#)  
[Brand Center](#)

# Protecting personal data

## What we do

Each of us has a critical role to play in preserving information security and protecting personal data.

## Why we do it

In the course of our jobs, we may need to access personally identifiable information (PII). This is information about an individual that reveals their identity, including address, phone number, email, or tax identification number. Safeguarding employee, customer, and supplier PII is a top priority for us. It is essential to maintaining our business and retaining stakeholder trust.

## How we do it

We protect personal data when we:

- Do not share PII outside of the Company or with colleagues inside the Company who do not have a “need to know.”
- Only maintain employee records required for business, legal, or contractual reasons.
- Actively participate in mandatory trainings to recognize and protect ourselves against potential security and cyber threats.

- Properly handle PII we may be in possession of by following the appropriate guidelines, policies, and procedures.
- Stay alert for cyber threats when working online and answering emails. We watch out for signs of phishing, malware, ransomware, and other cyberattacks.

### LEARN MORE

[Communication Systems Use Policy](#)  
[Communication Systems Use Procedure](#)  
[Data Security Standard](#)



A photograph of several wind turbines in a field at dusk or dawn. The sky is a deep, dark blue, and the turbines are silhouetted against it. The foreground is a dark, textured field, possibly a field of flowers or crops.

# Our communities

# Meeting our ESG commitments

## What we do

We build business resilience, customer trust, and long-term value through our ESG program.

## Why we do it

At Lam, we aspire to incorporate environmental, social, and governance (ESG) principles into everything we do. When we consider the environmental and social impacts of our actions, we build business resilience and help raise the bar for our entire industry.

We are each responsible for working to meet our ESG goals. This may involve taking small steps, like recycling, or taking larger actions, like incorporating ESG into our daily work and how we do business. Together, we can make a greener and better world.

## How we do it

We base our ESG strategy, priorities, and goals on the following strategic pillars:

- **Business and governance**
  - Integrate ESG into our business operations.
  - Foster ownership and accountability.
  - Set strategy and goals.

- **Products and customers**
  - Innovate with ESG in mind.
  - Be a partner of choice for supporting our customers' ESG goals.
  - Design for environmental principles.
- **Sustainable operations**
  - Minimize our environmental impact through investments in energy, water, waste, and greenhouse gas emissions reductions.
- **Our workplace**
  - Build an inclusive, diverse, and engaged workplace while achieving top performance in health and safety.
- **Responsible supply chain**
  - Ensure an ethical and responsible business ecosystem focused on human rights and the environment.
- **Our communities**
  - Be a responsible corporate citizen with programs focusing on transformative learning, resilient communities, and inclusive societies.

### LEARN MORE

[2021 Environmental, Social, and Governance Report](#)  
[Environmental, Social, and Governance page](#)

# Promoting environmental protection and sustainability

## What we do

We act with purpose for a better world by protecting the environment in our operations, supply chain, and the products we create.

## Why we do it

Addressing climate change is one of the biggest challenges the world faces today, and we all have a role to play. Our own R&D and manufacturing activities have environmental impacts. So do our products when they are in use by our customers. When we accelerate our own climate action, we help our customers, suppliers, and other business partners do so too.

At Lam, we are working toward sustainability goals to operate on 100 percent renewable electricity by 2030 and become net zero by 2050. We also have goals and initiatives to reduce waste and conserve water and energy. We work as a team with our customers and suppliers to achieve these goals and protect the planet — together.

## How we do it

We promote environmental protection and sustainability when we:

- Follow our Environmental, Social, and Governance (ESG) program, Lam policies and procedures, and all applicable laws to work toward our sustainability goals.
- Hold suppliers accountable for setting and achieving emissions targets and increasing product energy efficiency.
- Identify ways to incorporate environmental principles into the design and manufacturing of our tools.
- Look for ways to reduce, recover, reuse, and recycle materials in our day-to-day work. This might include taking small practical steps each day, such as sorting our waste appropriately, avoiding single-use items, or bringing our own water bottle or coffee mug to work.
- Look for opportunities to incorporate environmental sustainability into our day-to-day job responsibilities and bring new ideas to the company on how to reduce our impact.
- Participate in Lam-sponsored environmental activities such as challenges and community volunteer events.



## Promoting environmental protection and sustainability (continued)

- Monitor and manage hazardous and non-hazardous waste so we can divert it from landfills and dispose of hazardous waste safely.
- Reduce energy use by turning off computers, monitors, conference room lights, and televisions.
- Follow our chemical information management system (CIMS) to facilitate safe chemical use. We report safety hazards immediately.

### Think about it

**Q** An employee-led Green Team is assessing how my campus could operate more sustainably. I have a few ideas, but I'm not sure if I can take work time to talk to them. What should I do?

**A** *At Lam, we put sustainability first in everything we do. We want to encourage every employee to come forward with ideas. Speak to your manager about how you can balance your workload while collaborating with the Green Team.*

### LEARN MORE

[2021 Environmental, Social, and Governance Report](#)  
[Environmental, Social, and Governance page](#)



# Respecting human rights

## What we do

We act with intention to uphold and protect human rights in our Company, communities, and supply chain.

## Why we do it

Dignified, safe work is a fundamental human right. It is our responsibility to ensure the health and protection of workers in our supply chain. We take action to prevent labor violations and promote better working conditions wherever we do business. We hold our suppliers to these same standards.

## How we do it

We protect human rights at Lam and through our supply chain when we:

- Follow our [Human Rights Policy](#), which includes following laws that protect human rights. For example, these include the U.K. Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010.
- Do not tolerate forced, indentured, bonded, or underage labor in our operations, including human trafficking and slavery.
- Conduct due diligence on conflict minerals. As a member of the Responsible Business Alliance (RBA)

and participant of the Responsible Mineral Initiative (RMI), we assess suppliers and smelters. By performing this due diligence, we aim to avoid human rights issues involving mining conflict minerals.

- Hold suppliers accountable for upholding human rights. We monitor suppliers and facilitate trainings to ensure they follow our [Global Supplier Code of Conduct](#) and the principles of the RBA.
- Never look the other way when we witness something wrong, illegal, or unsafe. We can always make a report using the Lam [Ethics Helpline](#).

### Think about it

Q

I was visiting a supplier location recently and saw that most of the workers appeared to be tired and working very long hours without shift changes. I'm concerned these may be signs of human rights violations. What should I do?

A

Make a report using the [Ethics Helpline](#) immediately. We must ensure that our suppliers respect human rights. If we see any concerning signs of illegal labor or unfair treatment, we must report it.

### LEARN MORE

[Global Employment Policy](#)  
[Global Supplier Code of Conduct](#)  
[Human Rights Policy](#)

# Contributing to our communities

## What we do

We empower employees to invest in our communities through volunteer opportunities, gift matching, and support of philanthropic organizations to build a better world for generations to come.

## Why we do it

Contributing to our communities is an essential part of our purpose to create a better world. We focus on transformative learning, resilient communities, and inclusive societies that share our Core Values to make a positive difference where we live, work, and play — we power breakthroughs together.

## How we do it

We contribute to our communities responsibly when we:

- Look for ways to give back to our communities. Whether it's through volunteering or participating in forums or charitable activities, we can all make a difference.
- Make donations on behalf of the Company primarily through the Lam Research Foundation and encourage charitable organizations to apply directly by visiting

the Lam Research website pages on [ESG](#) and [Our Communities](#). We must follow the process outlined in the [Lam Foundation's Guiding Principles](#).

- Do not use Lam funds to make any kind of payment that is illegal or improper, or that could negatively impact our people or reputation.
- Do not use a Lam corporate card or P-card to make a donation.
- Consult the [Equipment Donation process](#) and [University Collaboration Guidelines](#) when interested in equipment or university research donations.
- Never solicit donations, directly or indirectly, from suppliers, vendors, customers, or other third parties.
- Never pressure others to donate to charitable organizations or other community activities. 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.
- Consult our [Sponsorship and Donations Guidance](#) or ask a manager if we have any questions.

### LEARN MORE

[Lam Foundation's Guiding Principles](#)  
[Lam Foundation Grant Seekers information](#)  
[Sponsorship and Donations Guidance](#)  
[University Collaboration Guidelines](#)  
[Equipment Donation process](#)

# Participating in the political process responsibly

## What we do

We continuously improve our communities through responsible political participation.

## Why we do it

At Lam, we are encouraged to exercise our right as citizens to participate in the political process. It can make a positive difference in our communities. If we participate in politics, it is important to keep our work separate, as we must not create the impression that Lam supports our personal causes.

## How we do it

We participate in the political process responsibly when we:

- Do not use Lam resources (including our time on the job) for political activities.
- Never pressure coworkers to make political donations or participate in political activities. We respect each other's beliefs, preferences, and time.
- Never work for a political party or candidate as part of our duties or as a Lam representative.
- Do not take political positions on the Company's behalf without prior approval from [Global Government Affairs](#). This especially applies to employees

who participate on the Company's behalf in trade associations or other external committees.

- Do not engage in lobbying or other political activities, or share Lam's lobbying activities externally, without prior written approval from [Global Government Affairs](#).
- Seek prior written approval from [Global Government Affairs](#) before interacting with government officials.

### Think about it

Q

**I finished my work early. Can I spend the rest of my time at the office working on a political campaign?**

A

*No. We cannot use Company resources — including work time — for political activities. Speak to your manager if you finish your work early.*

### LEARN MORE

[Political Activity and Government Affairs Procedure](#)  
[Public Policy Engagement and Political Activity statement](#)



# Ethics and Compliance



# A message from Ava Hahn, Chief Legal Officer

Our commitment to building an ethical culture is dependent on you. We could not do it without each of us working together. Remember that you must report illegal, unethical, or inappropriate behavior or concerns.

Thank you for your commitment to ethics and compliance and our Core Values of Honesty and Integrity and Open Communication.

— Ava



# We're here to help

Our E&C team is here to help and is a resource to:

- Provide guidance on how to apply our Code, policies, and procedures to business activities.
- Provide ethics and compliance training and communications.
- Receive reports of, and investigate suspected violations of, our Code, policies, procedures, and the law.

We have a trusted process that allows E&C to conduct fair and thorough investigations, to make factual findings, and to recommend remediation. Investigations conducted by E&C are confidential and often protected by attorney-client privilege.

If you are concerned about a possible violation of our Code, policies, procedures, or the law, contact [E&C](#) or submit a report via the [Ethics Helpline](#).

## LEARN MORE

[Reporting Concerns Policy](#)



# Ethics Helpline reminder

---

Remember that you can use our [Ethics Helpline](#) to report concerns or ask questions:

- 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 can also contact any of the following resources:

- [E&C](#), [Legal](#), [HR](#), or [ER](#)
- E&C inbox: [ethics@lamresearch.com](mailto:ethics@lamresearch.com)
- ER inbox: [employee.relations@lamresearch.com](mailto:employee.relations@lamresearch.com)
- Audit Committee:
  - Attention Board Audit Committee, P.O. Box 5010, Fremont, CA 94537-5010
- Your manager







[www.lamresearch.com](http://www.lamresearch.com)