

	<b>Title:</b> <b>GLOBAL STANDARDS  OF BUSINESS CONDUCT  POLICY</b>	<b>Number: LGL-1000</b>  <b>Revision: 18</b>  <b>Effective Date: July 29,  2021</b>
<b>Organization:</b> Legal Department	<b>Functional Group:</b> Ethics and Compliance	
<b>Author:</b> Kelley M. Kinney <b>Job Title:</b> Sr. Director, Ethics and Compliance	<b>Process Owner:</b> Nick Bougopoulos <b>Job Title:</b> Vice President, Chief Compliance Officer	
<b>Authorized By:</b> Ava Hahn <b>Job Title:</b> Senior Vice President, Chief Legal Officer		



# Lam Research® Global Standards of Business Conduct

*Living Our Core Values*

# 1. Contents

1	Introduction.....	2	4	Our Relationship with Other Companies and Stakeholders .....	13
1.1	Statement of Policy .....	2	4.1	Antitrust Regulations.....	13
1.2	Affected Parties .....	2	4.2	Trade Controls.....	14
1.3	Administration and Enforcement .....	2	4.3	Preventing Bribery and Corruption .....	15
1.4	Definitions.....	3	4.4	Environmental, Health, and Safety.....	16
1.5	Decision-Making Checklist.....	3	4.5	Insider Trading .....	16
2	Our Relationship with Each Other .....	3	4.6	Charitable Donations, Political Contributions, and Political Activities .....	16
2.1	Fair Employment Practices .....	4	4.7	Public Communications.....	18
2.2	Anti-Harassment .....	4	5	How We Uphold the Policy.....	18
2.3	Combating Trafficking and Forced Labor.....	4	5.1	Ethics and Compliance Team .....	18
2.4	Workplace Health and Safety.....	4	5.2	The Ethics Helpline .....	18
2.5	Protecting Employee Information .....	4	5.3	Compliance.....	19
3	Our Relationship with the Company .....	5	5.4	Investigations, Litigation, and Other Legal Matters.....	19
3.1	Protecting Confidential Information.....	5	5.5	Asking Questions and Reporting Concerns or Violations .....	19
3.2	Protecting Intellectual Property Rights .....	7	5.6	Safe Reporting.....	20
3.3	Ensuring Financial Integrity and Responsibility	8			
3.4	Using Lam’s Assets and Communications Systems Responsibly.....	9			
3.5	Avoiding Conflicts of Interest .....	10			

# 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 by the Chief Executive Officer and the Chief Legal Officer or Chief Compliance Officer. Operations executives of the Company (such as an Operations Director or Vice President) 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).

## 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

### 1.4 Definitions

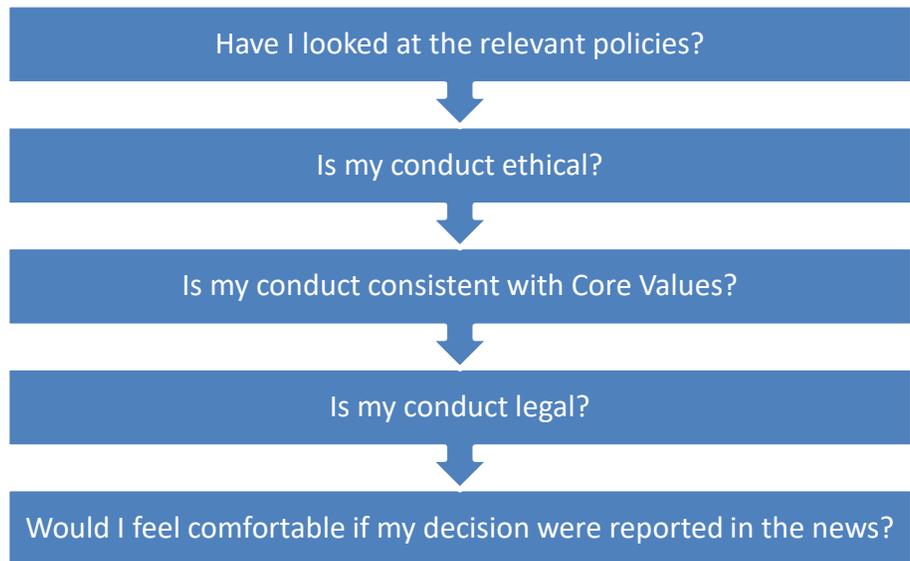
“Lam” or “Company” refers to Lam Research Corporation and each of its subsidiaries.

“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

## 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.

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 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 [Environmental Health and Safety 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

## 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

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.

## 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 [Global Information 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.

## Protecting Confidential Information

Confidential information must be stored in a way that it is not seen or accessible by those persons who do not need access to that information.

When you are away from your desk, put documents that contain confidential information in locked drawers or cabinets. Do not store such information in electronic format on servers that are accessible to personnel who do not need to know such information.

For other measures to protect confidential information, please review Company policies including our [Global Information Security Policy](#) and [Data Security Procedure](#).

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.

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 [Global Information 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

## Intellectual Property

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

legally and ethically by:

- Using information from publicly available sources such as published articles, press releases, advertising and public records;
- Never misrepresenting yourself or using improper means;
- Never seeking confidential information about other companies from job applicants;
- Never bringing confidential information belonging to prior employers onto Lam premises or systems, or using confidential information from prior employers;
- When communicating with competitors, 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, communicate that through the Competitive Information process (where it can be vetted by Lam's legal department) or contact Legal immediately. The information should not be shared, distributed or analyzed, except as instructed by your Competitive Information or Legal contact.

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 [Global Information Security Policy](#), [Data Security Procedure](#), [Technology Control Plan](#), [Competitive Intelligence Policy](#) and [Competitive Intelligence Procedure](#).

### 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.

## Financial Integrity

You may not enter into an NDA or any other contract on behalf of Lam without following the Signature Authorization Policy, which provides that most contracts require Legal review.

You must ensure our financial records are accurate and complete.

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.

### 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 [Global Approval and 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

## 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.

including our [Global Approval and 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](#), [Global Records Management Procedure](#) 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

## Conflicts of Interest

If you are in a situation in which there might be an actual, potential or perceived Conflict, or there is a question whether there is a Conflict, you must [disclose it](#).

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](#), [Global Information Security Policy](#), and [Mobile Device Use Procedure](#).

### 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 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, potential or perceived conflict of interest, you must disclose it and obtain approval in accordance with our [Conflict of Interest Procedure \(LGL 41207\)](#). You may not exercise your own judgment in these areas. Potential responses include: (i) that Lam has no present objection, subject to conditions and future review; (ii) the steps you must take to resolve the conflict to Lam's satisfaction; or (iii) that the activity is not permitted.

It is important to make timely disclosures to avoid any actual, potential and perceived conflicts of interests. Disclose all conflicts using this [Employee Conflict of Interest, Gift and Entertainment Disclosure form](#). For more information, consult our [Conflict of Interest Procedure](#).

#### 3.5.1 Giving or Receiving Gifts, Meals, Travel and Entertainment (GMTE)

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

- For a legitimate business purpose – i.e., to promote Lam equipment and services and build business relationships;
- Appropriate in timing;

## Gifts, Meals, Travel and Entertainment

- You are expected to know what situations require pre-approvals. All pre-approval requests must be submitted using this [Gifts, Meals, Travel and Entertainment Disclosure form](#).
- 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.

- Proportionate to the level of seniority;
- Moderate in value and infrequent (not extravagant or excessive);
- Compliant with laws, regulations, and ethical standards; and
- Consistent with Lam's Core Values and not negatively reflect on Lam's image should it become public.

Employees must comply with Lam's [Gifts, Meals, Travel and Entertainment \(GMTE\) Policy](#) and [Procedure](#), which contain specific requirements (e.g., spending and aggregate limits) and prohibitions related to giving and receiving GMTE. Lam strictly complies with all applicable laws and regulations relating to anti-bribery and corruption. Employees may not give, offer, promise or authorize GMTE to public officials or state-owned entities without complying with our policies and applicable laws. There is increased risk when dealing with state-owned entities and public officials and excessive meals or entertainment offered can be viewed as an improper advantage. Lam's [GMTE Policy](#) and [Procedure](#) guides employees on what is permissible and when further approvals and guidance is required. You also must comply with our Company's expense reimbursement [policy](#) and [procedures](#) and properly document all expenses.

Our business partners' (including public officials and state-owned entities) policies or their contracts with Lam may contain different requirements regarding GMTE and other business courtesies. You are expected to know and to comply with the applicable requirements. If our business partners' requirements differ from those of Lam, you must comply with whichever requirement is most restrictive. This is especially important when dealing with public officials or employees of state-owned entities.

*Giving and Receiving Gifts.* Advertising novelties or gifts of moderate value (nominally U.S. \$150 or less) are generally appropriate. In rare circumstances where local custom may call for an exchange of gifts having greater value than US\$150, pre-approval is required from the CEO Staff Member in your management chain along with your manager and Ethics & Compliance before a gift may be offered or accepted. Lower limits apply to gifts to public officials and employees of state-owned entities, and requests to exceed those limits must be pre-approved by your CEO Staff Member in your management chain, your manager and Ethics and Compliance. Cash or cash equivalents such as gift cards, payments, or loans may never be offered. You may not give gifts from Lam funds or

## Outside Employment

Avoid taking a part-time job where you may be tempted to work on that job during your normal Lam working hours, or to use our Company's assets.

## Outside Directorship

Obtain approvals as required by these guidelines before you accept positions on the board of directors of other companies.

## Personal Investments

Determining whether there is a divided loyalty depends on many factors, such as:

- Personal interests that might affect the decisions we make at Lam;
- The size of our investment relative to our finances; and
- The nature of the relationship between Lam and the other Company.

personal funds in violation of this policy.

*Travel.* Employees must comply with the Gifts, Meals, Travel, and Entertainment Policy and Procedure when deciding whether it might be appropriate to offer or accept travel. Travel should never be offered in conjunction with a business deal to improperly influence a third party, and any offer of travel to business partners or public officials requires pre-approval from Ethics & Compliance. All travel must be related to the promotion, demonstration and explanation of Lam's products and services. 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 agreement and documentation to substantiate the charges. Employees may not accept payment for travel from a third party. If a third party offers to pay for your travel expenses, contact Ethics and Compliance.

Submit all GMTE pre-approval requests using this [Gift, Meals, Travel and Entertainment Pre-approval form](#).

### 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 Ethics and Compliance.

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 and Ethics and 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

## Relatives and Friends

Disclose situations where there is a potential for a relationship between employees to result in an actual or perceived conflict of interest.

## 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.

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 Related Parties: Family, Romantic and Other Personal Relationships

Conflicts of Interest can arise in situations where you may be conducting Lam business with a Related Person. See Appendix B of our [Conflict of Interest Procedure](#) for required disclosures and approvals.

A conflict of interest can also arise when an employee’s employment or position may be directly or indirectly influenced by a family member or other employee with whom there is a personal relationship. For guidance regarding situations involving family, romantic or other personal relationships, please refer to Lam’s [Conflicts of Interest Created by Relationships](#).

## 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 Antitrust Regulations

We are committed to competing vigorously, but fairly and honestly and in compliance with all applicable antitrust laws and regulations. In relation to our competitors and the market in which we operate, do not discuss, or reach agreements about, any of the following topics without prior Legal approval:

## 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).

- 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.

### 4.2 Trade Controls

There are many regulations that govern the movement of Lam's products, software, and technology across international borders. These include laws dealing with importing and exporting tangible and intangible items, prohibiting illegal trade boycotts, and administering trade or economic sanctions. We are committed to complying with all applicable laws and regulations governing these activities in all countries in which we do business.

In support of our commitment to trade compliance, we obtain all appropriate import, export and re-export authorizations for our global business. We screen our business partners against the sanctioned parties list, establish protocols related to the export of controlled technology and work with our internal business partner to implement processes which support

## 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

our compliance objectives. For more information about Lam's trade compliance program please refer to the [Trade Compliance Management Policy](#).

Each of us, in our day-to-day activities, is responsible for complying with trade regulations. Should you have any questions about trade regulations and your role or questions about Lam's trade compliance activities, please contact [Foreign\\_Trade@lamresearch.com](mailto:Foreign_Trade@lamresearch.com)

### 4.3 Preventing Bribery and Corruption

Lam requires all employees to comply with all relevant laws and regulations that prohibit bribery and corruption including, but not limited to, the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the Malaysian Anti-Corruption Commission Act. We do not engage in any form of bribery or corruption, whether it is commercial or governmental bribery. Lam has zero tolerance towards bribery and corruption and facilitation payments—these are strictly prohibited. Employees must comply with Lam's [Global Anti-Bribery and Corruption Policy \(ABC Policy\)](#). This policy outlines the expectations of our employees to ensure that Lam business is conducted ethically and in compliance with anti-corruption laws and regulations. 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;
- Be aware of heightened bribery and corruption risks when dealing with public officials and employees of state-owned entities;
- 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, meals, travel, entertainment, and other business courtesies;
- Accurately and completely record all expenses;
- Never make or authorize charitable donations to improperly influence the recipient or Lam business partner, or in exchange of any business or other commercial advantage; and
- Obtain pre-approval from Ethics & Compliance and the Lam Research Foundation for charitable donations.

With the exception of documented regulatory fees and other legally required charges, you may not offer or make any payments to any government official from Lam or personal funds in violation of this policy.

*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

## 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.

## 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.

pay such compensation or personal benefits to individual employees, family members or associates of suppliers.

### 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 Standard](#) 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 Approval and Signature Authorization Policy](#) and the corresponding [Procedure](#) apply to business and marketing related expenditures as well as donations made from corporate funds.

#### *Charitable Donations*

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

## 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.

scholarships through the Lam Research Foundation must follow the process set forth in the [Lam Foundation Guiding Principles](#). In addition, donations made from corporate funds must follow 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 and Lobbying*

Any contact with government officials intended to influence legislation, policies, or government action not otherwise part of a competitive bidding process may be considered lobbying. Lobbying activities and political engagement are regulated by laws in many countries, and failure to comply with these laws could result in legal violations and cause reputational risk to Lam. At Lam, only Global Government Affairs (and their authorized representatives) may engage in lobbying activities on Lam's behalf. You must obtain prior written approval from Global Government Affairs to lobby, or to authorize anyone else to lobby on Lam's behalf.

You are free to participate in political activities or contribute to political parties and candidates in your personal capacity and with your own resources, money, and time, but you must avoid communicating or acting in a manner that could lead others to believe your personal views are those of the Company. You may not use Lam funds, resources, or assets for political contributions unless there is an identifiable business need for such use, and such use is approved in advance by Global Government Affairs. 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.

For more information and guidance on these topics, please reference our [Political Activity and Government Affairs Procedure](#).

## 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)

## 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.

For more information, please refer to our [Fair Disclosure of Material Nonpublic Information Procedure](#) 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 and procedures, or laws and regulations. Please raise your concerns or

## 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.

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.

### 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 and from the CLO or CCO.

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.

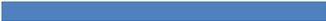
### 5.5 Asking Questions and Reporting Concerns or Violations

Each of us has an obligation to report potential or actual violations of the law, this Policy, and other Company policies and procedures. If you observe or otherwise become aware of a violation, you must immediately notify your manager, Human Resources, 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.



### 5.6 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.