

Company Name Lam Research
Industry ICT (Own operations and Supply Chain)
Overall Score (*) 15.2 out of 100

Theme Score	Out of	For Theme
0.5	10	A. Governance and Policies
3.1	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
1.6	20	D. Performance: Company Human Rights Practices
3.0	20	E. Performance: Responses to Serious Allegations
3.3	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: General HRs commitment Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core: The Company declares that 'Lam Research Corporation is committed to fair and humane employment practices as a core business principle to ensure compliance with all applicable government standards and regulations and to provide a productive and fair workplace'. It then goes on stating a list to principles remarking that it 'supports' them. In the CSR Report 2018, it indicates that 'in 2018 Lam participated in a new customer pilot program to ensure the human rights of contract, migrant, and temporary workers of our suppliers that are located in high risk geographies. This new program requires a comprehensive policy that prohibits forced and bonded labor; it includes such topics as freedom of movement, fees, voluntary separation, and humane work conditions'. However, no evidence found of a formal commitment to the ILO Declaration, all ILO core areas, or the UN Global Compact. [Global Employment Practices Statement, n/a: lamresearch.com & CRS Report 2018, 2019: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: UNGC principles 3-6: See above. • Not met: Explicitly list ALL four ILO for ICT suppliers: The Company points out that it requires from suppliers, compliance with the RBA Code, which contains all of discrimination, child labour, forced labour, freedom of association and right to collective bargaining. However, in relation to freedom of association and collective bargaining, the RBA code states the following: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. It is not clear whether it is committed to respect these rights in all contexts, as it is committed to respect them 'in conformance with local laws' (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights). [Global Supplier Code of Conduct, 1/08/19: lamresearch.com & RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company commits to some labour standards, including child labour, forced labour, discrimination and freedom of association. No evidence found, however, of commitment to respect the right to collective bargaining. [Global Employment Practices Statement, n/a: lamresearch.com] • Met: Respect H&S of workers: It indicates that it is 'committed to the sustainable management of Environmental, Health and Safety (EHS) as a core business principle'. Moreover, 'we are committed to providing our employees a safe and healthy workplace, whether they work in an office, a manufacturing or R&D facility, or in the field. [EHSS Commitment Policy, 07/2013: lamresearch.com & CRS Report 2018, 2019: lamresearch.com] • Met: H&S applies to ICT suppliers: The company states that 'we commit to complying with all applicable laws and regulations and protecting the health and safety of our employees, contractors, and customers'. In addition, the RBA code of conduct covers health and safety. [CRS Report 2018, 2019: lamresearch.com & RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: working hours for workers: The Company 'supports' that 'workweeks do not exceed the maximum set by applicable laws. Generally, work weeks are not to be more than 60 hours in a work week for non-exempt employees, including overtime, except in emergency or unusual situations. Workers shall also be allowed at least one day off per seven-day week or as set by applicable laws. However, no evidence found of references to regular working week hours or the Company explicitly committing to respect ILO conventions on working hours. In addition, it is not clear what exceptional or unusual situations would be. [Global Employment Practices Statement, n/a: lamresearch.com] • Not met: Working hours for ICT suppliers: The RBA, which is required for suppliers, indicates that 'working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days'. However, no evidence found of references to standard working week hours or the Company explicitly committing to respect ILO conventions on working hours. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org]
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing in conflict areas: The company indicates that it "fully supports the intent of Section 1502 of the Act" which "requires certain public companies whose products contain these 'conflict minerals' to make annual disclosures and conduct reasonable due diligence on their supply chains to determine the sources of such conflict minerals". However, no commitment to the responsible sourcing of minerals from conflict affected and high-risk areas was found. [Supply Chain Diversity, 18/04/19: lamresearch.com] • Not met: Based on OECD Guidance: The company points out that it "exercises due diligence with suppliers consistent with the framework provided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas". However, no evidence of a commitment based on OECD guidance to the responsible sourcing of minerals from conflict affected and high-risk areas was found. [Supply Chain Diversity, 18/04/19: lamresearch.com] • Not met: Requires responsible mineral sourcing from suppliers: The company indicates that it communicates its "expectations for conflict free materials sourcing to suppliers". However, it is not clear that its suppliers have to make a commitments to the responsible sourcing of minerals from conflict affected and high-risk areas. [Supply Chain Diversity, 18/04/19: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: Only mention to "tin, tantalum, tungsten, and gold (and their derivatives)" was found. [Supply Chain Diversity, 18/04/19: lamresearch.com] • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company indicates that it 'regularly communicates with policy makers and community leaders. We interact to ensure a positive impact in the communities where we operate'. Also, it 'encourages employees to provide feedback and input through managers, HR, the Ethics & Compliance team, including an Ethics and Compliance Helpline, and formal surveys'. Finally, 'Lam works with suppliers to meet emerging customer needs and collaborate as we develop more stringent social and environmental requirements, including screening and auditing requirements regarding human trafficking, child and forced labor, human rights, and workplace safety'. [CRS Report 2018, 2019: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company indicates that it 'works with suppliers to meet emerging customer needs and collaborate as we develop more stringent social and environmental requirements, including screening and auditing requirements regarding human trafficking, child and forced labor, human rights, and workplace safety. As a supplier, we participate in several work groups and organizations to review best practices regarding contractors/migrant workers, human rights, cyber security, supplier diversity, and workplace inclusion and diversity'. However, no evidence found that the Company regularly engages with affected stakeholders and their legitimate representatives in the development or monitoring of its human rights approach. By engagement with potentially and actually affected stakeholders CHRB means engaging in a dialogue with the stakeholders who might be, or are, impacted by the company's activities and/or with their legitimate representatives. Depending on the nature of the company's operations, this can include (but is not limited to) workers, their families, local communities and any other person or group of people whose life and environment might be impacted. [CRS Report 2018, 2019: lamresearch.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): The company indicates that "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". However, no clear policy committing to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders in relation to its operations was found. [Global Standards of Business Conduct, 03/2017: investor.lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: CEO or Board approves policy Not met: Board level responsibility for HRs: The Company indicates that its CSR Report 2018 'has been reviewed by the Compensation and Nominating and Governance Committees of our Board of Directors and has been reviewed and approved by our President and CEO'. However, no human rights policy was found in the report. [CRS Report 2018, 2019: lamresearch.com] Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key ICT HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to ILO core conventions Not met: Senior responsibility for HR Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key ICT HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR risks is integrated as part of enterprise risk system: Although the company mentions "compliance with specific environmental, social, and corporate governance standards", it is not clear how it is integrated as part of a broader enterprise risk system and whether it includes human rights. [Form 10-K, 24/06/2018: investor.lamresearch.com] Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to ILO core conventions: See indicator A.1.2 Met: Communicates its policy to all workers in own operations: The company indicates that "because of the importance of the topics covered in this Policy, you (employee) must sign a document at the time of hire and periodically thereafter certifying your understanding of and compliance with this Policy". Moreover, employees "are required to read and understand this Policy". [Global Standards of Business Conduct, 03/2017: investor.lamresearch.com] Score 2 <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
	of policy commitment(s) to business relationships		<ul style="list-style-type: none"> • Not met: Communicating policy down the whole ICT supply chain • Not met: Requiring ICT suppliers to communicate policy down the chain Score 2 <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: The company indicates that "focusing on our Core Values – including Innovation and Continuous Improvement, Achievement, Teamwork, Ownership and Accountability, Mutual Trust and Respect, and Honesty and Integrity – allows us to continue building on our successes. These values are part of new employee training and are regularly communicated to employees to reinforce our commitment. They also extend to our Code of Ethics and our Global Standards of Business Conduct". However, it is not clear that all employees receive training in human rights. No further evidence found in the CSR Report 2018. [CSR Report 2017, 2017: lamresearch.com & CRS Report 2018, 2019: lamresearch.com] • Not met: Trains relevant ICT managers including procurement: The Company indicates that 'Web-based human trafficking and anti-slavery training' is also mandatory for all global operations and supply chain management'. However, no details found on whether procurement managers are receiving this training. [CRS Report 2018, 2019: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Met: Monitoring ICT suppliers: The Company states that it periodically audits 'major direct product supplier operations, including to address the risks of human trafficking and slavery in our supply chain'. The audit is conducted by Lam employees, directly or in conjunction with third parties. [Slavery and Human Trafficking Statement, 24/06/18: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company indicates that 'auditing and mitigation processes include verification, training, auditing of compliance, and corrective action, if required'. However, no description found of its corrective action process(es) and numbers of incidence. [CRS Report 2018, 2019: lamresearch.com] • Not met: Example of corrective action • Not met: Discloses % of ICT supply chain monitored
B.1.7	Engaging business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR affects ICT selection of suppliers: The company indicates that "in order to verify prospective direct product suppliers, we require all new direct materials suppliers, as part of the supplier screening process, to provide a completed written certification that addresses risks of human trafficking and slavery". [Slavery and Human Trafficking Statement, 24/06/18: lamresearch.com] • Met: HR affects on-going ICT supplier relationships: The company indicates that "we request a written certification from major direct product suppliers that the materials incorporated into their products comply with applicable laws and regulations, including laws regarding slavery and human trafficking of the country or countries in which they are doing business". Moreover, "direct suppliers, employees and contractors who fail to comply with Lam's policies are subject to corrective action up to and including termination". [Slavery and Human Trafficking Statement, 24/06/18: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above. • Not met: Working with ICT suppliers to improve performance: The company indicates that it implements "collaborative approach to working with our supply chain and strive to actively share best practices in order to mitigate our collective challenges". However, it is not clear how it works, and no evidence found of particular examples. [Slavery and Human Trafficking Statement, 24/06/18: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company indicates how it requires feedback from each stakeholder. It 'encourages employees to provide feedback and input through managers, HR, the Ethics & Compliance team, including an Ethics and Compliance Helpline, and formal surveys'. Also, 'Lam works with suppliers to meet emerging customer needs and collaborate as we develop more stringent social and environmental requirements, including screening and auditing requirements regarding human trafficking, child and forced labor, human rights, and workplace safety'. Finally, 'Lam regularly communicates with policy makers and community leaders. We interact to ensure a positive impact in the communities where we operate'. However, no evidence on how it has identified the affected stakeholder with whom interact, and engaged in human rights issues. [CRS Report 2018, 2019: lamresearch.com] • Not met: Frequency and triggers for engagement: No evidence of engagement with these groups including frequency. No further information about what triggered engagements was found. [CRS Report 2018, 2019: lamresearch.com] • Not met: Workers in ICT SC engaged • Not met: Communities in the ICT SC engaged: The Company indicates that 'policy makers and community leaders are proactively contacted by our team to keep them informed about our current operations and future plans. We interact with them to determine how Lam can continue to positively contribute to the communities where we operate our business'. However, no evidence found of engagement with communities on human rights (requirements of the system indicated above applying to local communities). [CRS Report 2017, 2017: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company indicates that 'in 2018, we conducted a new materiality assessment. Using a third-party firm, we reviewed important topics and risks published in our 2018 Proxy and Annual Report, consulted with senior management, and catalogued feedback from stakeholders, including investors. The results of this materiality assessment will inform 2019 CSR activities and the 2019 CSR Report. The CSR team also benchmarked our CSR program in part based on scores and rankings by third-party ratings organizations'. However, although it covers community engagement and employee wellness, no process with specific focus on human rights issues was found to identify its human rights risks and impacts. [CRS Report 2018, 2019: lamresearch.com] • Not met: Identifying risks in ICT suppliers: The company indicates that 'in 2017, we expanded our due diligence on suppliers to 90% of Lam's direct material spend'. However, no description of the process(es) to identify its human rights risks and impacts was found. No further evidence found in the CSR Report 2018. [CRS Report 2017, 2017: lamresearch.com & CRS Report 2018, 2019: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders: The Company indicates that 'In 2018, we conducted a new materiality assessment. Using a third-party firm, we reviewed important topics and risks published in our 2018 Proxy and Annual Report, consulted with senior management, and catalogued feedback from stakeholders, including investors'. However, no evidence found of whether this consultation with stakeholders involved human rights issues. [CRS Report 2018, 2019: lamresearch.com] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and key industry risks)		
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in ICT supply chain • Met: Example of Actions decided: The company sets out the steps that it has taken during the fiscal year ended June 24, 2018 to ensure that slavery and human trafficking are not taking place in our supply chain or any part of their own business. It discloses a pilot program to help raise awareness in their supply chain and understand how to support their suppliers into the prevention and elimination of forced and bonded labor of foreign migrant workers ("FMWs") in their supply chain. [Slavery and Human Trafficking Statement, 24/06/18: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including ICT suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The company indicates that through its third-party managed Ethics Point, "anyone may report a concern related to potential misconduct involving Lam including, without limitation, Lam employees". [Ethics point, 18/04/19: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect ICT supplier to have equivalent grievance systems • Met: Opens own system to ICT supplier workers: The company indicates that "anyone may report a concern related to potential misconduct involving Lam including, without limitation, Lam employees, contractors, suppliers and customers". [Ethics point, 18/04/19: secure.ethicspoint.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The company indicates that its Ethics Point is available to anyone may report a concern related to potential misconduct involving Lam including, without limitation, Lam employees, contractors, suppliers and customers". [Ethics point, 18/04/19: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.3	Users are involved in the design and performance of the	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this

Indicator Code	Indicator name	Score (out of 2)	Explanation
	channel(s)/mechanism(s)		Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: ICT suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: The company points out that "after 5-6 business days", the complainant should use their "report key and password to check" their report for feedback or questions. It is not clear, however, the timescales for responding and addressing the complaint. [Ethics point, 18/04/19: secure.ethicspoint.com] • Met: How complainants will be informed: See above. [Ethics point, 18/04/19: secure.ethicspoint.com] • Not met: Who is handling the complaint Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The company indicates that "the audit committee has established procedures to ensure that employee complaints or concerns regarding audit or accounting matters will be received and treated anonymously (if the complaint or concern is submitted anonymously and permitted under applicable law)". However, it is not clear how complaints regarding human rights issues might be escalated to more senior levels or independent parties for resolution. [Annual Report 2018, 7/09/2018: investor.lamresearch.com]
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The company states that they "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". [Global Standards of Business Conduct, 03/2017: investor.lamresearch.com] • Met: Practical measures to prevent retaliation: The company points out that 'concerns about ethics violations can be reported through our Ethics and Compliance email address or sent anonymously through our third-party managed EthicsPoint Helpline'. [CRS Report 2018, 2019: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects ICT suppliers to prohibit retaliation: As indicated in previous indicators, the channel is available to anyone and the statement above includes a commitment against retaliation against anyone. [Global Standards of Business Conduct, 03/2017: investor.lamresearch.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe: The company indicates that it "complies with applicable wage laws, including minimum wage, overtime, legally mandated benefits, and payroll documentation. Lam only deducts from wages as requested by the worker or as required by applicable laws". However, no mention of a living wage, which is sufficient to cover essential needs for workers and their official entitled dependents and provide some discretionary income, was found. [Global Employment Practices Statement, n/a: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The company expects that the "compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits". However, it is not clear if the company is referring to a living wage, which should be sufficient to cover food, water, clothing, transport, education, health care and other essential needs for workers and their officially entitled dependents and provide some discretionary income. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: The Company indicates that it "does not use workers under the age legally permitted or under the age for completing compulsory education (whichever is greater) in its manufacturing". [Global Employment Practices Statement, n/a: lamresearch.com] • Not met: Age verification of job applicants and workers: The company indicates that "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". However, no evidence of age verification for job applicants and workers was found. [Global Standards of Business Conduct, 03/2017: investor.lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The company expects suppliers not to use child labor "in any stage of manufacturing". However, no evidence found of age verification requirement for job applicants and workers or of remediation programmes. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: How working with suppliers on child labour: The company indicates that it 'works with suppliers to meet emerging customer needs and collaborate as we develop more stringent social and environmental requirements, including screening and auditing requirements regarding human trafficking, child and forced labor, human rights, and workplace safety'. It is not clear, however, how it works with suppliers to improve working conditions for young workers where relevant. [CRS Report 2018, 2019: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions: The company indicates that it "complies with applicable wage laws, including (...) payroll documentation". However, it is not clear that these documents explain legitimate deductions. [Global Employment Practices Statement, n/a: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The company indicates in its Code that "Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used". Moreover, "workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker". [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The company indicates that "workers are not required to hand over government-issued identification, passports, or work permits as a condition of employment, although they may be required to show such identification". [Global Employment Practices Statement, n/a: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The company indicates, in the Code that "there shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities". Moreover, "employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law". [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: The company indicates that "in conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment". However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company discloses that it 'ended 2017 with a recordable rate of 0.29'. [CRS Report 2018, 2019: lamresearch.com] • Met: Fatalities disclosures: The Company indicates that, in 2018, 'there were no fatalities'. [CRS Report 2018, 2019: lamresearch.com] • Not met: Occupational disease rates <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company indicates that 'in 2019, Lam will begin preparation at our Osan and Fremont sites to achieve third-party validation to ISO 45001, the new international standard for safety management systems, published in March 2018. The goal of ISO 45001 is to help organizations achieve further reduction of occupational injuries and diseases, and it is based on OHSAS 18001 conventions and guidelines which will be replaced once 45001 certification is achieved in 2020'. However, it is not clear whether there are specific quantitative targets in relation to lost days, injuries and fatalities. [CRS Report 2018, 2019: lamresearch.com] • Not met: Met targets or explains why not: The Company indicates that 'much of our success in sustaining our low recordable rate is due to our proactive prevention and awareness programs. A key element of these programs is our employee- and management-driven Risk Management By Walking Around (RMBWA) inspection process. The RMBWA inspections not only help us identify and track corrective actions for potential health and safety risks, they drive active engagement by our workforce'. However, it is not clear what the targets for health and safety was. [CRS Report 2018, 2019: lamresearch.com]
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its supplier Code of Conduct, the company sets health and safety requirements and guidelines that cover: occupational safety; emergency preparedness; occupational injury and illness; industrial hygiene; physically demanding work; machine safeguarding; sanitation, food, and housing; health and safety communication. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: Occupational disease rates <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S: The company says that it educates its suppliers on the use of its program. However, not further information was found. [EHSS Commitment Policy, 07/2013: lamresearch.com] • Not met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence: The company claims to be "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". However, no clear description of its processes to prohibit harassment, intimidation and violence against women was found. [Global Standards of Business Conduct, 03/2017: investor.lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Working conditions take account of gender: The company indicates that it "will include in our next CSR report enhanced disclosure about our inclusion and diversity programs and demographic information about the ethnic and gender diversity of our workforce". However, it is not clear how it takes into account differential impacts on women and men of working conditions, including to reproductive health. No further information was found. [Annual Report 2018, 7/09/2018: investor.lamresearch.com] • Not met: Equality of opportunity at all levels: The Company indicates that 'we encourage employee-driven initiatives where diverse communities can share, network, learn, and support each other. Employee Resource Groups (ERG) include Women in Leadership at Lam, Women in Global Operations, (...) and Women in Engineering'. However, no description found of how it provides equality of opportunity for women in the workforce that are monitored and maintained throughout all levels of employment. [CRS Report 2018, 2019: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts: The company expects from suppliers that "reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers". However, no further requirement found for pay equal pay for equal work, and to have measures to ensure equal opportunities throughout all levels of employment. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on women's rights • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations: The company indicates that "workweeks do not exceed the maximum set by applicable laws. Generally, work weeks are not to be more than 60 hours in a work week for non-exempt employees, including overtime, except in emergency or unusual situations. Workers shall also be allowed at least one day off per seven-day week or as set by applicable laws". However, no evidence found of references to international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [Global Employment Practices Statement, n/a: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How it implements and checks this
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts: The company expects, in its supplier code, that "working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days". However, no evidence found of references to international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on working hours • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing due diligence in supplier contracts: The company indicates that it "exercises due diligence with suppliers consistent with the framework provided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas". However, no evidence found of due diligence following OECD Guidance being included in commercial contracts or agreements with suppliers. [Supply Chain Diversity, 18/04/19: lamresearch.com] • Not met: Builds capacity with smelters/refiners: The Company indicates that suppliers are evaluated by Assent (third party). If they do not meet or exceed Assents criteria "are expected to receive educational material from Assent on how to improve their conflict minerals programs". However, no further details found capacity building measures being implemented with suppliers and smelters/refiners. [Form SD, 2017: investor.lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Disclosure of smelter information in supplier requirements • Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Risk identification and disclosure in line with OECD Guidance: The Company indicates that made surveys to suppliers using the CMRT and the responses were used to identify risks in the supply chain. The risks assessments are then reviewed by members of the Company's supply chain organization. Assent compared data relating to smelters identified, and also evaluated suppliers on the strength of their programs. However, no evidence found of further steps taken to evaluate rights it might be facing, and which are the risks identified. [Form SD, 2017: investor.lamresearch.com] • Met: Identification of smelter/refiners and OECD due diligence: The Company states that survey covered suppliers using the CMRT to identify the source and chain of custody for the subject minerals contained in our in-scope products. "Many Covered Suppliers indicated that they received information regarding their supply chains from fewer than 75% of their suppliers and, therefore, could not provide a comprehensive list of all smelters or refiners in their supply chains. Responses provided by Covered Suppliers using the CMRT included the names of facilities identified by those suppliers as smelters or refiners. Assent compared these facilities with the list of smelters and refiners maintained by the RMI and, if a supplier indicated that the facility was certified as "conflict-free," confirmed that the facility had been given that designation by the RMI. Assent assigns each RMI-recognized smelter or refiner a relative risk designation based on several factors, including geographic proximity to the DRC and Covered Countries, and whether a smelter or refiner has committed to a third-party audit. [Form SD, 2017: investor.lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses smelters/refiners judged in line with OECD due diligence: The Company states that "we have validated as RMI-recognized 321 of the potential smelters or refiners identified by Covered suppliers". 257 have been identified as "compliant" with the RMAPs third-party audit protocol, 11 as "active" (agree to audit or undergoing). The Company provides the list clarifying which are "conformant", "active" and "not enrolled". [Form SD, 2017: investor.lamresearch.com] • Not met: Responsible conflict mineral sourcing covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes mineral risk management plan for supply chain: The company indicates that "our risk management plan to respond to any situations which might arise involving Subject Minerals contained in our in-scope products being identified as sourced from the Covered Countries includes: carrying out the due diligence described in this Report; understanding the products impacted by any supplied materials identified as containing Subject Minerals; understanding the extent of our reliance on such materials; undertaking additional due diligence and risk mitigation to respond to identified risks; and communicating to our suppliers that any Subject Minerals should be sourced responsibly wherever possible. When Assent determined that, according to its criteria, a smelter or refiner reported on a CMRT by one of our Covered Suppliers potentially posed a risk, risk mitigation activities were initiated. Assent responded to CMRT submissions identifying any such smelter or refiner with instructions to the supplier to take risk mitigation actions. As per the OECD Due Diligence Guidance, the appropriate risk mitigation depends on the supplier's specific position in the supply chain. Suppliers are given clear performance objectives within reasonable timeframes with the goal of reducing these potential risks from the supply chain. In addition, Suppliers identifying smelters or refiners deemed by Assent to potentially pose a risk were requested to submit a product-specific CMRT, to allow us to better identify any connection between such a smelter or refiner and the products being supplied to us". [Form SD, 2017: investor.lamresearch.com] • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Supplier and stakeholders engaged in risk management strategy: The company indicates that it "continues to monitor and work with customers, suppliers, and industry groups to collaborate on industry-wide solutions that enable companies to make easier transitions towards sourcing conflict minerals that are "DRC conflict free" (as defined in the Final Rules) in the future". It is not clear how it consults with them to agree in the Company's specific risk management strategy. No further information found. [Supply Chain Diversity, 18/04/19: lamresearch.com] • Not met: Responsible conflict mineral sourcing covers all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 12.18 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.05 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.31 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Lam Research made data public that met one or more elements of the methodology in 17 cases, leading to a disclosure score of 1.31 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company has a GRI Index. [CRS Report 2018, 2019: lamresearch.com]
F.3	Key, High Quality Disclosures	0 out of 4	<p>Lam Research met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p>

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.