

Company Name Lam Research
Industry ICT (Own operations and Supply Chain)
Overall Score 16.1 out of 100

Theme Score	Out of	For Theme
0.3	10	A. Governance and Policies
3.7	25	B. Embedding Respect and Human Rights Due Diligence
6.5	20	C. Remedies and Grievance Mechanisms
2.4	25	D. Performance: Company Human Rights Practices
3.2	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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: The company states that it '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'. Previous assessment was based on evidence from a source that CHRB no longer considers a suitable source for policy statements. [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Company has a commitment to the ILO Core [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: Company has an 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 a commitment to respect the right to collective bargaining and it is not clear the right to freedom of association is granted in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in accordance with applicable laws'. [Global Employment Practices Statement, n/a: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: The Supplier Code of Conduct requires suppliers' compliance with the RBA Code, which establishes labour standards. It indicates that 'the provisions in this Code are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work'. However, it is not clear from this statement that it also expects its suppliers to commit to respecting the human rights that the ILO has declared to be fundamental rights at work, as 'derived from' is not considered a formal statement of commitment according to CHRB wording criteria. [RBA V.7, 2021: responsiblebusiness.org] & [Supplier Code of Conduct, 2021: lamresearch.com] • Not Met: Company explicitly list All four ILO for suppliers: The Company, on its Supplier Code of Conduct, indicates that it requires suppliers' compliance with the RBA Code, which establishes labour standards, including: the rights to freedom of association and collective bargaining and not to be subject to discrimination, child labour, forced labour. However, regarding freedom of association and collective bargaining, it is not clear whether the Company requires suppliers to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases, companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [RBA V.7, 2021: responsiblebusiness.org] & [Supplier Code of Conduct, 2021: lamresearch.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: It indicates that 'We are committed to the sustainable management of Environmental, Health, and Safety (EHS) as a core business principle'. However, it is not clear the Company is committed to respect the health and safety of workers. The previous assessment was partly based upon the Company's CSR Report 2018, dated 2019, which CHRB no longer considers is a suitable source for policy statements. [V.18 - Global Standards of Business Conduct, 29/07/2021: investor.lamresearch.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: It 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'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Global Employment Practices Statement, n/a: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: It indicates that 'Suppliers must ensure that all its employees operate in safe working environments. Suppliers must take measures to detect, avoid and respond to potential risks to the health and safety of its employees'. [Supplier Code of Conduct, 2021: lamresearch.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates, on its Supplier Code of Conduct, that it requires suppliers' compliance with the RBA Code, which establishes labour standards. It 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. All overtime must be voluntary'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [RBA V.7, 2021: responsiblebusiness.org] & [Supplier Code of Conduct, 2021: lamresearch.com]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (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: Responsible mineral sourcing: It indicates that 'Lam takes corporate responsibility seriously, and it is our goal to use in our products only conflict minerals that are sourced responsibly, including any conflict minerals that may be sourced from the Covered Countries'. However, 'a goal' is not considered a formal statement of commitment according to CHRB wording criteria. [Conflict minerals policy statement, N/A: lamresearch.com] • Not Met: Based on OECD Guidance: It indicates that it 'Exercises due diligence with suppliers consistent with the framework provided by the OECD Due Diligence

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			<p>Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas'. However, no evidence of a commitment to follow OECD Guidance could be found, as 'consistent with the framework' is not considered a formal statement of commitment according to CHRB wording criteria. [Conflict minerals policy statement, N/A: lamresearch.com]</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to commit to responsible mineral sourcing: It indicates, on its Supplier Code of Conduct, that 'Suppliers must champion social responsibility and sustainability practices and make reasonable efforts to ensure that the materials and minerals they source are produced in accordance with local, national and international laws'. Moreover, according to it's the RBA Code, which suppliers are also expected to respect: 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. No further evidence found that the Company expects its suppliers to commit to responsible sourcing of minerals or to follow the OECD Guidelines. [Conflict minerals policy statement, N/A: lamresearch.com] & [RBA V.7, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: No evidence found of a responsible sourcing policy statement to follow the OECD Guidance that explicitly covers all minerals. [Conflict minerals policy statement, N/A: lamresearch.com] • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Met: Expects suppliers to respect at least one of these rights: The Supplier code of conduct requires suppliers 'compliance with the RBA Code, which establishes labour standards. It indicates that 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including (...) migrant'. [RBA V.7, 2021: responsiblebusiness.org] & [Supplier Code of Conduct, 2021: lamresearch.com] <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 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: The Company commits to remedy • Not Met: Company expect suppliers to make this commitment: The Supplier Code of Conduct requires suppliers' compliance with the RBA Code, which establishes labour standards. It indicates that 'If child labor is identified, assistance/remediation is provided'. However, it is not clear that the Company expects its suppliers to commit to remedy all adverse impacts on individuals and workers and communities that it has caused or contributed to. [RBA V.7, 2021: responsiblebusiness.org] & [Supplier Code of Conduct, 2021: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	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, 07/2021: investor.lamresearch.com] • Not Met: Company expect suppliers to make this commitment

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Work with HRD to create safe and enabling environment

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 • Not Met: Board level responsibility for HRs: The Company indicates that its CSR Report 2019 '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 evidence found of a specific board committee or member being tasked with human rights oversight. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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 • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making: The Company indicates that the 'Executive-level responsibility for economic, environmental, and social topics' is the 'Vice President of Corporate Communications and Investor Relations'. However, it is not clear that it covers human rights accountability. [CSR Report 2019, 2020: lamresearch.com] Score 2 • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com] • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HR risks is integrated as part of enterprise risk system: Among its risk factors, the Company points out: 'large customers may be able to negotiate

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			<p>requirements that result in (...) compliance with specific environmental, social, and corporate governance standards'. Moreover, 'as a public company with global operations, we are subject to the laws of multiple jurisdictions and the rules and regulations of various governing bodies, including (...) local laws prohibiting (...) conflict minerals or other social responsibility legislation, immigration or travel regulations(...). Each of these laws, rules, and regulations imposes costs on our business, including financial costs and potential diversion of our management's attention associated with compliance, and may present risks to our business, including potential fines, restrictions on our actions, and reputational damage if we are unable to fully comply'. However, although issues related with social compliance and regulation is reflected in the Company's risk factors, it is not clear how attention to human rights risks are integrated as part of its broader enterprise risk management systems. [2019 Annual Report, 06/09/2019: investor.lamresearch.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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: Score of 1 on A.1.2.a • Met: Communicates its policy to all workers in own operations: Regarding its Global Standards of Business Conduct, the Company indicates that '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'. Moreover, employees 'are required to read and understand this Policy'. The document makes reference to labour standards. [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The company states: "Lam Research Corporation's ("Lam Research") Supplier Code of Conduct sets out the minimum standards of conduct that Lam Research expects all Suppliers to meet while conducting business with or on behalf of Lam Research. Lam Research is committed to conducting business with the highest integrity and in a responsible manner and we expect these shared values from all our Suppliers. Failure by a Supplier to comply with the provisions of the Code may result in the termination of Lam Research's business relationship with that Supplier." However, not clear how the company communicate policy to stakeholders. [Supplier Code of Conduct, 2021: lamresearch.com] • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Company indicates that 'We hold our supply chain accountable to Lam's Global Supplier Code of Conduct, which incorporates by reference and requires suppliers' adherence to both the RBA Code of Conduct and ISM Guiding Principles. As of June 2019, acknowledgment and consent to adhere to our supplier code of conduct is a mandatory requirement of our new supplier onboarding process'. Moreover, the Company indicates that 'suppliers are contractually obligated to comply' with the Global Employment Practices Statement. The RBA Code has a set of labour standards and requires suppliers to have a 'process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code'. [CSR Report 2019, 2020: lamresearch.com] & [RBA V.7, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, 'As of June 2019, acknowledgment and consent to adhere to our supplier code of conduct is a mandatory requirement of our new supplier onboarding process'. Moreover, the Company indicates that 'suppliers are contractually obligated to comply' with the Global Employment Practices Statement. The Statement covers labor standards. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates: 'We require that all our employees take an annual online training course that reinforces their understanding of selected topics covered by the GSBC (Global

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Standards of Business Conduct) and certify that they have read the GSBC. (...) In 2019, 97% of employees completed the training'. Moreover, 'We provide our key safety programs and training in multiple languages'. [CSR Report 2019, 2020: lamresearch.com]</p> <ul style="list-style-type: none"> • Not Met: Trains relevant managers including procurement: The Company indicates that 'We annually train our supply chain management employees on how to carry out inspections and recognize potential signs of human rights abuses'. However, no details found on whether procurement managers are receiving this training. [CSR Report 2019, 2020: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: The company says: "We understand the importance of an ethical and responsible supply chain and are committed to partnering with our suppliers to address critical issues. We hold our suppliers to the same Core Values to which we hold ourselves and have created clear expectations via our Global Supply Chain Code of Conduct and contracts. Sourcing the specialized components needed for our process equipment and services requires our supply chain to have a global presence and a global approach. We are committed to complying with all applicable laws and regulations and request our direct material suppliers to conduct their business in this manner as well. We work closely with our suppliers to address a wide range of issues, including human rights, supplier diversity, environmental impact, and mineral sourcing. Our management approach includes surveys, verifications and certifications, employee training and communications, compliance auditing and inspections, and corrective actions when warranted. Our Global Supply Chain Management Operations has a dedicated contracts and compliance manager who leads a cross-functional team to maintain supply chain compliance and ethical practices." [2019 Annual Report, 06/09/2019: investor.lamresearch.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: According to its 'Global California Transparency in Supply Chains Act' on its webpage Supply Chain': 'We periodically audit 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 Research employees, directly or in conjunction with third parties. During the last fiscal year, audits were announced, but we reserve the right to conduct unannounced audits'. In its 2019 CSR, the Company indicates: 'We hold our suppliers to the same Core Values to which we hold ourselves and have created clear expectations via our Global Supply Chain Code of Conduct and contracts. (...) Our management approach includes surveys, verifications and certifications, employee training and communications, compliance auditing and inspections'. The 'developed a new supplier survey to include CSR-related questions' was one of the Company's 2019 key accomplishments'. [CSR Report 2019, 2020: lamresearch.com] & [Supply Chain, N/A: lamresearch.com] • Not Met: Proportion of supply chain monitored: The Company indicates: 'In 2019, Lam also began monitoring (...) and our top 100 suppliers with operations in high risk regions for human trafficking'. However, it is not clear the proportion of the supply chain monitored, including different human rights topics. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process: The Company indicates, in its webpage Supply Chain, that 'Lam direct product suppliers, employees, and contractors who fail to comply with Lam's policies are subject to corrective action up to and including termination'. Also, according to the 2019 CSR Report, it implements corrective actions related to safety issues. However, no further evidence found of its corrective action process(es) and numbers of incidences. [CSR Report 2019, 2020: lamresearch.com] & [Supply Chain, N/A: lamresearch.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	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: HR affects 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>certification that addresses risks of human trafficking and slavery (...). The verification is conducted by Lam Research's Global Supply Chain Management Contracts and Compliance Manager'. [Supply Chain, N/A: lamresearch.com]</p> <ul style="list-style-type: none"> • Met: HR affects on-going 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 product suppliers, employees, and contractors who fail to comply with Lam's policies are subject to corrective action up to and including termination'. [Supply Chain, N/A: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements: The company indicates that 'We work closely with our suppliers to address a wide range of issues, including human rights, supplier diversity, environmental impact, and mineral sourcing'. However, no details found on how carries out work with suppliers to improve their performance, including evidence of examples. [CSR Report 2019, 2020: lamresearch.com]
B.1.8	Approach to engagement with 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 to identify and engage with workers/communities in the last two years: The Company indicates: 'We regularly engage with our stakeholders, through formal and informal channels, to seek their feedback on CSR issues, and consider their perspectives when developing and managing our CSR objectives'. Among its stakeholders are: employees, suppliers and community. The Company also discloses the ways engagement takes place with each group. Regarding employees: 'Lam solicits employee feedback through in-person and online employee forums, engagement sessions, all-employee meetings, pulse surveys, conversations with managers, and our HR Support and Employee Relations programs'. Also, 'Lam collaborates with suppliers to meet customer needs and create an ethical supply chain by developing social and environmental requirements and processes'. Lastly, 'Lam actively partners with non-profit organizations and community leaders to create positive impact in places where we operate'. However, it is not clear how it has identified and engaged with affected stakeholders in the last two years in human rights. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Identifying risks in own operations: The Company indicates: 'To ensure the salience of our CSR strategy, we conduct a materiality assessment every three to five years, or when notable shifts happen in our business. In 2018, we conducted a materiality assessment in accordance with both the Sustainable Accounting Standards Board (SASB) and the Global Reporting Initiative (GRI). As part of the assessment process, we reviewed important topics and risks published in our public financial filings, consulted with senior management and key internal and external stakeholders, and benchmarked our CSR program according to data provided by third-party ratings organizations. This assessment identified 13 priority topics. We consolidated the priority topics into six categories, which inform our key strategies and overall CSR framework. We use this framework to drive our CSR programs, set our goals, and guide our disclosures'. The Company's 'CSR strategy is composed of six key pillars that are derived from our materiality assessment' and among them is 'Responsible Supply Chain: Ensure an ethical and responsible business ecosystem focused on human rights and environment'. However, although it engaged with external stakeholders and it covers employee wellness, no process with specific focus on human rights issues was found to identify its human rights risks and impacts within its own operations. [CSR Report 2019, 2020: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: The Company indicates: 'In 2019, we evolved our approach to focus on high risk countries where our suppliers are located. To implement this approach, we surveyed our top 100 supplier families located in countries which the International Labor Organization identified as high risk for human trafficking. We also enhanced our human trafficking due diligence by adopting the Social Responsibility Alliance's Slavery and Trafficking Risk Template (STRT). As a result of these efforts, we now have greater visibility into our supply chain operations and can better prioritize our due diligence and risk mitigation actions'. [CSR Report 2019, 2020: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing 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: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Description of how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HR issues: In the 2019 CSR, the Company indicates: 'In 2019, Lam completed an 18-month long pilot customer partnership program to raise awareness in our supply chain and understand how to support our suppliers in the prevention and elimination of forced and bonded labor of foreign migrant workers. The pilot program included certain major direct material suppliers and involved: Encouraging and guiding pilot program participants to update their company policies for more comprehensive policies prohibiting forced labor/bonded labor in any form; Communicating expectations related to preventing forced and bonded labor to all agents and subagents in the home and destination countries; Mapping the entire journey of existing foreign migrant workers from their home country or province to their facility; Assessing the journeys of their foreign migrant workers, identifying risk points and any controls in place; Creating a corrective action plan, ensuring identified risks were addressed and that foreign migrant workers were repaid any fees associated with employment by the end of the 2019 calendar year'. [CSR Report 2019, 2020: lamresearch.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	<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: 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, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: Although the Company indicates that its Ethics Helpline is available 'in most regions where Lam operates', it is not clear it is available in all appropriate languages. No further evidence found. [CSR Report 2019, 2020: lamresearch.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: In the webpage Ethics Point, the Company indicates that 'anyone may report a concern related to potential misconduct involving Lam including, without limitation, Lam employees, contractors, suppliers and customers'. Moreover, according to the 2019 CSR: 'The Ethics Helpline is operated by an independent service and is available 24 hours a day and seven days a week in most regions where Lam operates. It is accessible through both our external and internal websites. The Helpline provides a channel for employees, suppliers, customers, and other business partners to seek guidance or report suspected ethical or compliance violations'. [Ethics point, N/A: secure.ethicspoint.com] & [CSR Report 2019, 2020: lamresearch.com] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<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: Grievance mechanism for community: The Company indicates, in its webpage Ethics Point, that 'Anyone may report a concern related to potential misconduct involving Lam including, without limitation, Lam employees, contractors, suppliers and customers'. Moreover, according to its 2019 CSR: 'The Ethics Helpline is operated by an independent service and is available 24 hours a day and seven days a week in most regions where Lam operates. It is accessible through both our external and internal websites'. [Ethics point, N/A: secure.ethicspoint.com] & [CSR Report 2019, 2020: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Met: Communities access mechanism direct or through suppliers: The Company indicates, in its webpage Ethics Point, that 'Anyone may report a concern related to potential misconduct involving Lam including, without limitation, Lam employees, contractors, suppliers and customers'. Moreover, according to its 2019 CSR: 'The Ethics Helpline is operated by an independent service and is available 24 hours a day and seven days a week in most regions where Lam operates. It is accessible through both our external and internal websites'. [Ethics point, N/A: secure.ethicspoint.com] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants: The company describes the Reporting Process, which follows the steps: 1. Completing and submitting the report, 2. Initial Assessment, 3. Information Gathering, 4. Review, and finally, 5. Completion. However, no technical or financial support information is described. [Ethics point, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			treated anonymously (if the complaint or concern is submitted anonymously and if 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 as an option of the complainant (for employees and other stakeholder). [2019 Annual Report, 06/09/2019: investor.lamresearch.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	<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: 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, 07/2021: investor.lamresearch.com] • Met: Practical measures to prevent retaliation: The company points out that 'Concerns may be reported anonymously, and all reports are treated confidentially'. [CSR Report 2019, 2020: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: Company states that: "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" <p>However, this is not a clear statement that no legal action will be taken against complainants. [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com]</p> <ul style="list-style-type: none"> • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: 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, 07/2021: investor.lamresearch.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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: Says how it would provide remedy for victims if no adverse impact identified: The Company indicates 'Every time a report of a potential violation is made through the Helpline, we document it, investigate it, determine appropriate remediation, and make sure that necessary remedial measures are taken'. The Company indicates that as part of 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, involved: 'Creating a corrective action plan, ensuring identified risks were addressed and that foreign migrant workers were repaid any fees associated with employment by the end of the 2019 calendar year'. [CSR Report 2019, 2020: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Number grievances filed, addressed or resolved and outcome achieved: The Company indicates that 'We did not receive any reports from our suppliers regarding human rights issues in 2021' However, the company does not disclose information on the number of grievances filed by its own employees or other stakeholders. The company also does not disclose other data on the practical operation of the mechanism as required by this indicator. [2021 Environmental, Social, and Governance Report, 2022: lamresearch.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (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: Pays living wage or sets target date: The company says: "Lam 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 information found regarding paying a living wage. [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.4.1.b	Living wage (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: Discloses living wage requirements in supplier code or contracts: According to the RBA Code of Conduct, 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'. Moreover, the Global Employment Practices Statement, which suppliers are contractually obligated to comply with, indicates: 'Lam 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, it is not clear if the company is referring to a living wage, which should cover employees and his/her family/dependents basic needs and provide for some discretionary income. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] & [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing 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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company discloses a map with 'Locations with suppliers', 'Possible locations of origin for 3TGs' and 'Locations with suppliers and possible locations of origin for 3TGs'. However, no further evidence found that it identifies its suppliers, including direct and indirect suppliers, and describes how it goes about this (current evidence seems to focus in mineral-related). [CSR Report 2019, 2020: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses the names and addresses of its headquarters, manufacturing facilities and offices across the world. However, no further evidence found of the names and addresses of suppliers for the most significant parts of its supply chain and of how it has defined what are the most significant parts of its supply chain. [Locations, N/A: lamresearch.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	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: Does not use child labour: The Company indicates that: 'We do not use workers under the age legally permitted'. Moreover, in its Global Employment Practices Statement, it states: 'Lam does not use workers under the age legally permitted or under the age for completing compulsory education (whichever is greater) in its manufacturing'. [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com] & [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: Age verification of workers recruited: Although the Company indicates that it does 'not use workers under the age legally permitted', no evidence of age verification for job applicants and workers was found. [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (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: 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 V.7, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on child labour: The company indicates, in its 2018 CSR Report, 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'. Moreover, according to its 2019 CSR Report 'We work closely with our suppliers to address a wide range of issues, including human rights, supplier diversity, environmental impact, and mineral sourcing'. However, no further details found of how it works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [CSR Report 2019, 2020: lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (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: Job seekers and workers do not pay recruitment fee: The company indicates that it 'complies with applicable wage laws, including (...) payroll documentation'. However, it is not clear that these documents explain legitimate deductions. • Not Met: Commits to fully reimbursing if they have paid <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	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: 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 V.7, 2021: responsiblebusiness.org] • Met: How working with suppliers on debt & fees: The Company indicates: 'In 2019, Lam completed an 18-month long pilot customer partnership program to raise awareness in our supply chain and understand how to support our suppliers in the prevention and elimination of forced and bonded labor of foreign migrant workers. The pilot program included certain major direct material suppliers and involved: Encouraging and guiding pilot program participants to update their company policies for more comprehensive policies prohibiting forced labor/bonded labor in any form; Communicating expectations related to preventing forced and bonded labor to all agents and subagents in the home and destination countries; Mapping the entire journey of existing foreign migrant workers from their home country or province to their facility; Assessing the journeys of their foreign migrant workers, identifying risk points and any controls in place; Creating a corrective action plan, ensuring identified risks were addressed and that foreign migrant workers were repaid any fees associated with employment by the end of the 2019 calendar year'. [CSR Report 2019, 2020: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (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 Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.d	Prohibition of forced labour: Wage practices (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: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of 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 these practices are monitored for agencies, labour brokers or recruiters: As part of their pilot project program to raise awareness in our supply chain and understand how to support our suppliers in the prevention and elimination of forced and bonded labour of foreign migrant workers, the Company indicates: 'Communicating expectations related to preventing forced and bonded labor to all agents and subagents in the home and destination countries'. However, it is not clear how it implements and checks that agents labour brokers / recruitment intermediaries are not restricting workers freedom of movement. [CSR Report 2019, 2020: lamresearch.com]
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	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 V.7, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
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 / Steps to avoid intimidation or retaliation: The Company indicates: 'We support the workers' right to freedom of association and collective bargaining'. However, no further evidence found of a commitment to not interfering with the right of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law), to bargain collectively and puts in place measures to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise these rights. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Discloses % total direct operations covered by collective CB agreements Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

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: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	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 process to identify H&S risks and impacts: The company says: "Our global Environmental, Health, and Safety (EHS) Policy outlines our commitment to protect all Lam personnel and minimize risk through prevention of illness, injury, and environmental impact. It applies to every site and employee where we operate. To uphold our commitment to safety, we invest in prevention-based education, training, and awareness programs, as well as emergency preparedness procedures. Our safety programs are governed through a multi-tiered system—which includes corporate governance, site-based EHS leadership and business unit involvement, and additional committees and reviews." [2021 Environmental, Social, and Governance Report, 2022: lamresearch.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: In 2021, the company registered 0.40 recordable injury rate (Lam vs. Industry). [2021 Environmental, Social, and Governance Report, 2022: lamresearch.com] • Not Met: Discloses Fatalities for last reporting period • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: Company states that: "Maintain an OSHA recordable injury rate at or below 0.4" [2021 Environmental, Social, and Governance Report, 2022: lamresearch.com] • Met: Met targets or explain why not or what is doing to improve management systems: The company says that, related to the goal mentioned above: "Realized recordable injury rate of 0.4 in 2021." [2021 Environmental, Social, and Governance Report, 2022: lamresearch.com]
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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. [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com] & [RBA V.7, 2021: responsiblebusiness.org] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The company reported 'Globally, Lam ended 2019 with a recordable injury rate of 0.33, less than half the 2018 industry average of 0.7. Our lost workday rate was 0.07, well below the industry average of 0.3. Our most common causes of injury, representing almost 70% of our injuries, continue to be strains and sprains, ergonomics, and slips, trips, and falls.' However, no information found for the last reporting period. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: The Company 'approaches occupational injuries and illnesses (...) as preventable. We seek to continually improve our EHS performance, culture and management systems, and work collaboratively with our suppliers and customers to deliver solutions that meet business and EHS objectives'. However, it is not clear how it engages with suppliers to improve their practices in relation to health and safety. [Environmental Health and Safety Policy, N/A: lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	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: Process to stop harassment and violence against women: The Company indicates, in its Global Standards of Business Conduct, its commitment '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'. Moreover, in the 2019 CSR Report, it states: 'We strengthened our Global Anti-Harassment Policy and required a harassment-prevention training for our global workforce. Our Employee Relationships team also serves as a resource for addressing employees' concerns'. [Global Standards of Business Conduct, 07/2021: investor.lamresearch.com] & [CSR Report 2019, 2020: lamresearch.com] • Not Met: Working conditions take account of gender: The Company indicates: 'Our management approach is built on the idea that our employees are at the heart of our company's success. Employee engagement, inclusion and diversity, professional development, recognition, safety, and wellness are areas we focus on to make Lam a great place to work'. However, it is not clear how it takes into account differential impacts on women and men of working conditions, including to reproductive health. [CSR Report 2019, 2020: lamresearch.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
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: As stated in the RBA Code of Conduct, 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'. Moreover, the Global Employment Practices Statement, which suppliers 'suppliers are contractually obligated to comply' with, indicates: 'Lam is committed to, and affirms its support of, equal opportunity in employment and non-discrimination in employment policies, practices and procedures on the basis of any category protected by applicable laws'. 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] & [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • 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 • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
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, according to the RBA Code of Conduct, 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'. Moreover, as stated in the Global Employment Practices Statement, which suppliers are contractually obliged to comply with: '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 (ILO), or standard weekly hours. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] & [Global Employment Practices Statement, n/a: lamresearch.com] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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: Due diligence in accordance with OECD Guidance 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 Responsibility website, N/A: lamresearch.com] • Not Met: Works with smelters/refiners and suppliers to build capacity: The Company indicates the following: 'We again made available to Covered Suppliers access to training and educational resources to guide them on best practices and the use of the CMRT, including access to Assent's Conflict Minerals training course. This training was tracked and evaluated based on completion. All suppliers are encouraged to complete all modules within this course.' However, no further details found capacity building measures being implemented with smelters/refiners. [Conflict Minerals Report 2019, 2020: investor.lamresearch.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: The Company states it includes 'a standard provision in the terms and conditions of our purchase orders requiring our suppliers to promptly provide accurate, complete and timely information and documentation to assist us as we may request to comply with Rule 13p-1 and Form SD. This includes disclosing whether any of the suppliers' deliverables contain Subject Minerals and, if so, providing such information as we may request to allow us to determine whether such Subject Minerals are DRC conflict free (as such term is defined in Form SD). We have also incorporated similar requirements into relevant commonly-used supplier contract templates to further strengthen supplier engagement in the due diligence process.' [Conflict Minerals Report 2019, 2020: investor.lamresearch.com] • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses 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 further information found, including risks faced. [Conflict Minerals Report 2019, 2020: investor.lamresearch.com] • Met: Identification of smelter/refiners and OECD Guidance: The Company uses a third-party and CMRTs to confirm the identity of possible smelters and refiners: '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.' [Conflict Minerals Report 2019, 2020: investor.lamresearch.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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.' [Conflict Minerals Report 2019, 2020: investor.lamresearch.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not Met: Suppliers 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 Responsibility website, N/A: lamresearch.com] • Not Met: Risk management and response processes cover 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 12.90 out of 80 points scored in themes A-D has been applied to produce a score of 3.23 out of 20 points for theme E.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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