

Lam Research Corp.

TICKER

NasdaqGS:LRCX

MARKET CAPITALIZATION

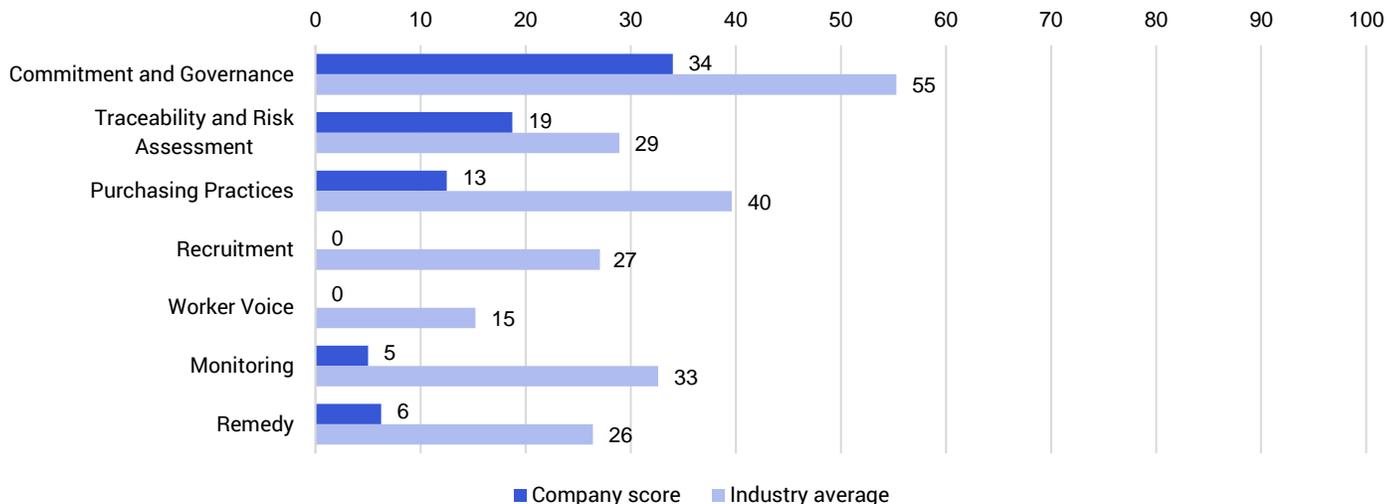
US\$31 billion

HEADQUARTERS

United States

COMPLIANCE
UK Modern Slavery Act: [Disclosure available, but not compliant](#)
California Transparency in Supply Chains Act: [Yes](#)
COMMITMENTS
[Yes](#)
OVERALL RANKING
33 out of 40
OVERALL SCORE
11 out of 100
SUMMARY

Lam Research Corp. (Lam Research), a semiconductor equipment supplier to companies such as Intel, ranks 33rd out of 40 companies disclosing less information on its forced labor policies and practices than its peers. Notably, it discloses a commitment to improve its audit checklist and auditor training and is one of the few companies that has a statement that is compliant with the minimum requirements of the California Transparency in Supply Chains Act. The company has an opportunity to improve its performance by disclosing its Global Supply Chain Compliance Policy, assessing and disclosing forced labor risks in different tiers of its supply chains, and addressing the risk of exploitation of migrant workers through recruitment agencies.

THEME LEVEL SCORES


LEADING PRACTICES

None

NOTABLE FINDINGS

Commitment and Governance: Lam research discloses that it has an attorney in “the position of Global Supply Chain Management Operations and Compliance” who works on implementing its policies and standards. Further, the company discloses that it provides periodic training on how to identify and mitigate risks of human trafficking and slavery “periodically” for “front-line employees” and employees with direct responsibility for supply chain management. In addition, the company states it participates in the Silicon Valley Conflict Minerals & Human Trafficking Forum.

Traceability: Lam Research discloses a list of smelters or refiners that are potentially linked to its supply chains and a list of countries that its minerals are possibly sourced from.

Supplier Selection: Lam Research discloses that as part of its screening process, prospective suppliers must provide it with a written “certification that addresses risks of human trafficking”.

OPPORTUNITIES FOR IMPROVEMENT

Supplier Code of Conduct: While the company has a Global Supply Chain Compliance Policy which “includes the prevention of slavery and human trafficking” and is reviewed annually, this document is not public. The company is encouraged to make this policy publicly and easily accessible from the company's website, ensure that the policy includes all four rights outlined in the ILO Declaration on Fundamental Principles and Rights at Work, and communicate the policy to its suppliers.

Traceability and Risk Assessment: The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. Further, the company is encouraged to disclose the names and addresses of its first-tier suppliers and information on its suppliers' workforce.

Recruitment: To address the risk of exploitation of migrant workers through recruitment agencies in its supply chains, the company may consider requiring recruitment agencies used by its suppliers to uphold workers' rights and ensuring that workers in its supply chains are not charged fees during any recruitment-related process. The company is also encouraged to ensure recruitment agencies used by its suppliers are audited, and to work with suppliers to guarantee migrant workers' rights are respected (e.g., to ensure workers' passports or other personal documents are not retained).

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes](#)