

The United Kingdom (“U.K.”) Tax Strategy

This tax policy is published as of April 30, 2022 and applies to the U.K. affiliates¹ of Lam Research Corporation and its subsidiaries (“Lam”) for the current financial year ending June 26, 2022. This strategy is in place as of this date and will remain in place until it is superseded by the publication of a new U.K. tax strategy. The U.K. affiliates consider this document to comply with the U.K. legislative requirements in paragraph 19(2) and paragraph 22(2), Schedule 19, Finance Act 2016.

Background

In September 2016, the Parliament of the U.K. enacted the Finance Act 2016 (the “Act”). According to the Act, a tax strategy needs to be published if certain requirements are met. The tax strategy should disclose the approach of the group to risk management and governance arrangements in relation to U.K. taxation, the attitude of the group towards tax planning (insofar as it affects U.K. taxation), the level of risk in relation to U.K. taxation that the group is prepared to accept, and the approach of the group towards its dealings with Her Majesty’s Revenue and Customs (“HMRC”).

References to “U.K. Taxation” are to the taxes and duties set out in paragraph 15(1) of the Act which includes income tax, corporation tax, value added tax (“VAT”), pay-as-you-earn (“PAYE”) tax, diverted profits tax, insurance premium tax, annual tax on enveloped dwellings, stamp duty land tax, stamp duty reserve tax, petroleum revenue tax, customs duties, and national insurance contributions.

Lam operates in over 20 countries, including the U.K. The activities in the U.K. are relatively small and relate mainly to one of the U.K. affiliate’s manufacturing and research & development operations. Publication of this U.K. strategy is required given the size of Lam’s worldwide operations.

Risk management and governance in relation to U.K. taxation

Lam’s Global Standards of Business Conduct Policy provides a framework to guide all Lam employees, officers, and directors. It is intended to promote honest, ethical, and lawful conduct. This policy is not limited in scope and therefore applies to U.K. tax matters.

Lam’s approach to U.K. taxation is to manage and report in a manner which provides compliance across all taxes, consistently complies with legal and regulatory requirements governing public statements and reports, meets internal control requirements, and supports business and commercial strategy. Lam is committed to complying with all applicable U.K. tax laws, filings, and reporting disclosures. Lam has an established network of internal and external tax and finance professionals who are knowledgeable in various direct and indirect U.K. taxes and who monitor ongoing tax law changes, as well as changes in Lam’s business, so that Lam may adapt processes and deliverables accordingly. This network, along with Lam’s framework regarding internal policies and controls, seeks to ensure the complete and accurate communication of tax positions and risks, as needed, through established governance and reporting processes to Lam Management, the Board of Directors, and the Audit Committee.

¹ UK affiliates include the following entities: Lam Research Ltd. (U.K.) and Metryx, Ltd. (U.K.)

Tax planning and risks

Lam's approach to tax planning is to develop holistic tax-efficient solutions to support the commercial needs of Lam's business while complying with tax rules and regulations worldwide. Lam aligns its transfer pricing policies with the guidelines of the Organisation of Economic Co-operation and Development ("OECD"), as well as the jurisdictions in which Lam operates. Lam applies the arm's length principle when conducting intercompany transactions. Lam strives to pay the correct amount of taxes in the appropriate jurisdictions as defined by applicable law.

The level of risk Lam deems acceptable is consistent with the overall objective to comply with tax rules and regulations worldwide to support Lam's business and commercial strategy. Lam accounts for tax risks in accordance with the applicable accounting standards and has controls in place over tax reporting processes.

Dealing with HMRC

Lam is committed to the principles of openness and transparency with tax authorities and looks to maintain a transparent and constructive relationship with HMRC. Pursuant to Lam's Global Standards of Business Conduct Policy, Lam fully cooperates with all inquiries.