

Values in Action

Standards of Business Conduct



INTEGRITY, RESPONSIBILITY, AWARENESS
COLLABORATION, INNOVATION, EXECUTION



CEO Message

Innovation has always been a trademark of the KLA brand. But innovation alone is not what sells our technology or makes us great.

Our collective commitment to hold ourselves to a higher set of values—values that set us apart and build trust with our customers, partners, shareholders and colleagues—is what defines us as a company and a united team.

At KLA, our people come from different disciplines and with different abilities—all working together to create something bigger than themselves. They embrace and exemplify our core values by demonstrating perseverance, driving to be better, being honest, forthright and consistent (HFC), building high-performance teams, and being indispensable to our customers.

Every day is a new opportunity to put our values into practice—from solving customer challenges to meeting tough engineering timelines to checking in with a team member who needs an extra hand on a project. Our actions speak volumes about who we are.

KLA's high standards of business conduct create our Values in Action. They define us as an organization, serving as a roadmap for how we should approach our business and relationships. If you suspect a violation of KLA's Values in Action, policies, or the law, you should report the issue. KLA provides numerous reporting channels, including HR, the Legal and Compliance Organization, your manager, or [KLA's EthicsPoint portal](#). We do not retaliate against anyone who reports an issue in good faith.



Rick Wallace

President and Chief Executive Officer

Thank you for embracing our Values in Action and reinforcing what is great about the KLA brand. With your individual commitment and sense of responsibility, we can continue to strengthen our company's reputation around the globe and strive to ensure ethical practices are upheld at all times.

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Our Code of Conduct

1. OUR WORKPLACE

Create a safe, respectful, supportive and inclusive environment where fair employment practices are extended to all members of the KLA community.

2. OUR RELATIONSHIPS

Be honest, forthright and consistent (HFC) in all of your KLA activities and relationships.

3. OUR STEWARDSHIP

Protect our Company by safeguarding KLA's intellectual property and confidential information.

4. OUR COMMITMENT

Understand and comply with the laws, regulations and KLA policies, and report suspected issues of noncompliance.

5. OUR VOICE

Create and sustain a culture where integrity and ethical conduct are exemplified by all of us.

We abide by all applicable laws and regulations and maintain honesty and integrity throughout the global business environment. Everything we do, every interaction we have, every product we create, every service we deliver, every commitment we make reflects our Values in Action.

Our Commitment

KLA's Values in Action Standards of Business Conduct (SoBC) applies to all employees, officers and directors of KLA Corporation and its subsidiaries worldwide ("KLA" or the "Company"). Each of us will be asked to acknowledge our awareness and understanding that we must follow the policies contained in the SoBC. Our acknowledgment also means that we will raise questions, concerns or possible violations of law or policy with our manager, human resources, or through [KLA's EthicsPoint portal](#), or another KLA reporting channel as described in Section 17 below. Finally, our acknowledgment means that we will fully participate whenever called upon in internal or external KLA investigations of possible violations of laws or KLA policies, or as needed to support the Company in its continued commitment to enhance and improve its compliance program.

Our collective commitment to hold ourselves to a higher set of values—values that set us apart and build trust in our customers, partners, shareholders and colleagues—is what defines us as a company and a united team.

Special Obligations for Leaders

Our leaders are expected to create an ethical and compliant culture and an environment where employees are encouraged and feel comfortable raising concerns. KLA prohibits retaliation in any form against anyone who reports a concern in good faith or cooperates with an investigation. Leaders are expected to understand our Values in Action Standards of Business Conduct and our policy requirements, and to lead by example and ensure that our values and reputation are not compromised. Leaders are also expected to notify KLA of any actual or potential violation of which they become aware, even if they stop or prevent it, and to engage with the Legal and Compliance Organization about the actual or potential violation.

At KLA we are fortunate to work alongside brilliant minds—individuals who embrace and exemplify our core values on a daily basis.

Values in Action Policies

Putting KLA's values into action requires all of us to understand the laws, regulations and policies that apply to KLA activities. The Values in Action policies that follow are generally designed to promote compliance with government laws and regulations. We must understand these rules and ask questions when we are unsure as to how to act.

In addition to this SoBC, KLA has a number of policies that apply to your activities. These policies may be found in [PolicyTech](#). These policies are subject to change; please consult PolicyTech regularly.

The policies cannot cover every conceivable situation that may arise. If you encounter a situation that is not addressed by a policy, ask yourself three questions:

1. Are my actions consistent with the KLA Values?
2. Are my actions legal and ethical?
3. How would my actions look to others within KLA and externally?

If you answer NO or MAYBE to either of the first two questions, or are uneasy about the third question, ask for guidance from an appropriate person (your manager, Human Resources, or the Legal and Compliance Organization) before taking any actions.

If you encounter a conflict between KLA policies and local law, or between KLA policies and the requirements of KLA's business partners or customers, follow the more stringent standard or ask for guidance from an appropriate person (your manager, Human Resources, or the Legal and Compliance Organization) before proceeding.

Our high standards of business conduct create our Values in Action. They truly define us as an organization, serving as a roadmap for how we should approach our business and relationships.

Penalties for Violations; Waivers

Employees and leaders who violate the spirit or letter of KLA's Values in Action, KLA policies or applicable legal requirements are subject to disciplinary measures up to and including termination of employment.

Before an employee engages in any activity that would be otherwise prohibited by the SoBC or any other KLA policy, they must obtain a written waiver from KLA's Board of Directors, the Legal and Compliance Organization or as specified in the applicable KLA policy. To request a waiver, submit an email to corporate.compliance@kla.com or follow the process specified in the applicable KLA policy. Waivers are granted only in rare circumstances and after careful deliberation.

Before a director or executive officer of KLA engages in any activity that would be otherwise prohibited by the SoBC or any other KLA policy, they must obtain a written waiver from the disinterested members of KLA's Board of Directors. Such waivers must then be disclosed to KLA's stockholders, along with the reasons for granting the waivers.

With commitment and sense of responsibility, we can continue to strengthen KLA's reputation around the globe and strive to ensure ethical practices are upheld at all times.

Our Workplace

*KLA is a safe, respectful and
supportive place to work.*

1. A Great Work Environment

Each of us should promote a respectful and safe work environment.

Employees are required to create and maintain a working environment that reflects KLA's core values:

- Perseverance
- Drive to Be Better
- Indispensable for Customers
- High Performance Teams
- Honest, Forthright and Consistent (HFC)

Discrimination & Harassment

Everyone has a responsibility to ensure that unlawful discrimination and harassment are not tolerated in our work environment (whether at a KLA facility or elsewhere) or factored in any employment-related decisions. Unlawful discrimination or harassment is forbidden in all aspects of employment. We prohibit all forms of unlawful discrimination or harassment on the basis of race, color, ethnicity or national origin, ancestry, religion, sex (including pregnancy, childbirth, or related medical conditions), age, disability, veteran status and all other statuses or characteristics protected by applicable international, national, regional or local laws or regulations. Please see KLA policies, including our [Global Human Rights Standards](#), [Harassment Free Workplace \(U.S.\) Policy](#), and [Harassment Free Workplace \(Non-US\) Policy](#), for further information.

Please contact your manager, your Human Resources Business Partner, or the Legal and Compliance Organization for questions regarding discrimination or harassment or to report suspected workplace discrimination or harassment. Reports of potential workplace discrimination or harassment may also be made through [KLA's EthicsPoint portal](#).

Workplace Safety

KLA is committed to providing a safe and clean environment so that everyone can conduct business in an efficient and productive manner. Employee safety is a top priority, and KLA's safety department works diligently to protect the health and safety of our workforce by ensuring effective training and protective measures are in place. KLA maintains certification to the ISO 45001 Occupational Health and Safety Management System Standard at our major sites globally, which demonstrates our commitment to safety. Each of us is required to promote and support KLA safety policies.

In addition, KLA is committed to a workplace free from the use of illegal drugs and the abuse of alcohol, which would prevent us from doing our jobs safely and effectively. Working under the influence of drugs or alcohol creates risks for KLA and our fellow employees. Accordingly, KLA does not allow individuals to use, possess, sell, manufacture, purchase, or be under the influence of alcohol, illegal drugs, other intoxicants or controlled substances at any time while on Company

KLA imposes a higher ethical standard than the law.

Example

Question:

One of my colleagues sends jokes to our team. The jokes often have sexual undertones and upset me and other members of my team. What should I do?

Answer:

Ask the person to stop sending the emails if you are comfortable doing so. Report the matter to your manager, HR, the Legal and Compliance Organization or EthicsPoint. Sending jokes with material containing racial, sexual or offensive undertones is a form of harassment and will not be tolerated.

Example

Question:

What do I do if I see an unsafe condition? What do I do if I have not been trained to safely perform a task? How do I report an unsafe condition or accident?

Answer:

If you see or learn of anything which could cause an unsafe situation, please report the matter to your local manager and/or you safety team or make a report using the [Safety Incident Reporting System \(SIRS\)](#). You may also file a report through EthicsPoint.

premises or while engaged in Company business. This prohibition does not apply to responsible alcohol use in moderation when served at Company-sponsored events.

Workplace Violence

To maintain a safe working environment, KLA does not tolerate threats of any kind, whether expressed or implied, threatening behavior, stalking or acts of violence. We take all reports of threatening behavior or violence seriously and will take appropriate action. In case of an emergency, contact [Global Security](#).

Talent: Attract, Develop and Inspire the KLA Workforce.

Our talent initiatives center on attracting, developing and inspiring our global workforce. We seek to hire top talent, including high-caliber graduates from across the world, with a variety of backgrounds, characteristics and perspectives that allow us to leverage the broad range of talents and experiences of a global workforce. We also enable employee career development opportunities through multi-faceted and broad-based programs, including making available vertical and horizontal career opportunities within the Company. This program not only engages employees by offering opportunities to periodically take on new roles and learning experiences, but also empowers KLA with a workforce enriched by a breadth of experience across multiple areas within the business. We believe this program also enhances employee knowledge and job satisfaction, while enabling closer collaboration with peers across the various functional groups in the Company.

Privacy and Confidentiality of Personal Data

KLA strives to protect the reasonable privacy interests of everyone with whom we do business, including our customers, suppliers, and employees. We must use, maintain, and transfer personal data that we collect in accordance with applicable data privacy laws and Company policies such as the [Personal Data Privacy Policy](#). Employees must only use other people's data in accordance with applicable data privacy laws and Company policies. Employees are required to protect personal data against unauthorized access or use. Please check with the Legal and Compliance Organization if you have any questions regarding the legality of specific transfers of personal information, including the transfer of personal information outside of the Company or outside of the country in which it was collected, or regarding the data privacy laws in any specific country by contacting privacy@kla.com.

Clear and Professional Communications

We value clear, accurate, respectful and professional communications in all our business interactions. Unprofessional communications or communications that could be perceived as disrespectful or unprofessional, in any form (email, texts, instant messages, presentations, social media applications, voicemails, etc.), can harm KLA and its reputation. Take care when communicating with others.

Employees commit themselves to confidentiality to protect personal data.

Example

Question:

My team is working on an implementation of a new cloud application that could result in accessing KLA employee personal data. Are there any approvals that I must obtain before engaging with a supplier on such a project?

Answer:

Yes, you must obtain the approval of both the Cybersecurity and the LCO teams before sharing, transferring, or permitting access to employee personal data by a supplier so we can vet the supplier's security and ability to safeguard our employee personal data and to ensure we have the appropriate contractual provisions in place. Please contact privacy@kla.com for assistance.

Our Relationships

*Our relationships are built upon
transparency and trust.*

2. Conflicts of Interest

Always avoid conflicts of interest.

By upholding our value of being honest, forthright and consistent (HFC), we set a clear ethical precedent and avoid situations that may conflict or appear to conflict with the interests of KLA. A conflict of interest occurs when your personal or private interests could or do interfere or appear to interfere with your duties and responsibilities to KLA. Our business decisions on behalf of KLA must be governed by sound and objective judgment, free from the influence of personal or private interests. Each of us has a duty to disclose conflict of interest situations and resolve them.

We have a responsibility to avoid situations where your personal interests interfere with KLA's interests.

What are Potential Conflicts of Interests?

KLA's [Conflicts of Interest Policy](#) describes various types of conflicts of interest. Some examples include:

Substantial Investments

Holding a substantial investment (directly or indirectly) in, or exercising control over, a competitor, supplier, customer, distributor or other company that does business with KLA.

Other Employment/Services

Being employed, providing services to or representing another company or institution that competes with or has potential to compete with KLA.

Gifts/Entertainment/Things of Value

Accepting (directly or indirectly) anything of value from a competitor, supplier, customer, distributor or similar business where the purpose of the thing of value is to (or could appear to be to) improperly influence or reward a business decision or relationship.

Taking KLA Business Opportunities

Competing with KLA by purchasing or selling any property or diverting from KLA any business opportunity in which KLA has or is likely to have an interest.

Romantic or Other Personal Relationships

Being involved, directly or indirectly, in any decision that could benefit or appear to benefit you, a relative or someone with whom you have a romantic or other personal relationship (including within and outside of KLA).

Use of KLA Assets

Using KLA's monies, facilities, information, know-how or personnel for any other business or personal endeavors.

Example

Question:

I am a service engineer and I would like to accept a part time engagement on the weekends providing support on KLA tools at a competitor company. It will not interfere with my work at KLA. Is this OK?

Answer:

No. You cannot compete directly or indirectly with KLA.

What You Should Do

Employees should disclose conflicts of interest issues through the [Conflict of Interest tool](#) and others may disclose the issue through [KLA's EthicsPoint](#) portal or send an email to corporate.compliance@kla.com so that the Company can determine whether an activity creates an actual, potential or perceived conflict of interest. In the case of giving or receiving gifts, meals, entertainment, and travel (GMET), follow KLA's [GMET Policy for Third Parties](#).

3. Outside Directorships

Obtain approvals before accepting outside directorships.

We understand that the bright minds at KLA may be sought after by other organizations for directorships. Generally, permission is granted provided the directorship does not conflict with the person's duties and responsibilities to KLA.

KLA policy requires that you obtain written authorization before accepting a directorship position with most companies and organizations, including:

- For-profit companies
- Industry associations
- KLA portfolio investment companies

KLA policy does not require written authorization before accepting a directorship position with charitable/non-profit organizations as long as the time commitment does not diminish the employee's effectiveness in performing their job at KLA and no other conflict of interest situation is present.

What You Should Do

Review and follow the [KLA Corporate Governance Standards](#) and [Policy for Serving on Outside Boards](#) and submit any required authorization request form to the designated person.

Special Requirements for Executive Officers

Executive officers are required to obtain the approval of the independent members of KLA's Board of Directors to serve as a director on a public company's board of directors. If you have any questions about outside directorships, please contact Human Resources or the Legal and Compliance Organization.

Always obtain authorization before accepting an outside directorship.

Example

Question:

I have been asked to serve as a member of the board of directors of a for-profit company. What do I need to do before I can accept the directorship?

Answer:

Before you accept the directorship, review and understand the [KLA Corporate Governance Standards](#) and [Policy for Serving on Outside Boards](#) and obtain the required written authorization.

4. Business Opportunities

Business opportunities and benefits belong to KLA first.

In keeping with our collective commitment to be forthright, honest and consistent, we must all maintain an ethical boundary as it relates to leveraging information about KLA's business opportunities, benefits and other Company interests, which could be used for personal gain.

An example could be the acquisition of any interest in technology, products or intellectual property that is either sought by or would be of potential interest to KLA.

What You Should Do

If you are unsure about a particular situation or have questions about whether KLA might be interested in pursuing a particular business opportunity, please disclose the issue in [KLA's Conflict of Interest tool](#) and work with your manager, the [Legal and Compliance Organization](#), and HR to resolve the issue.

Additional Obligation for KLA Officers and Directors

Officers and directors of KLA have an additional obligation and must not take for themselves any business opportunity or benefit that KLA may have an interest in pursuing—notwithstanding that their knowledge of the business opportunity or benefit was obtained independently of their relationship with KLA.

Never take advantage of KLA business opportunities or benefits for personal gain.

Example

Question:

A colleague within the finance organization learned, as part of his role at KLA, that a company was seeking to sell a technology that could benefit KLA. I am thinking about purchasing the technology for myself and using it to start my own company. May I do so?

Answer:

You must never take a business opportunity that belongs to KLA. Speak to the Legal and Compliance Organization about the opportunity before you act.

5. Gifts, Meals, Entertainment and Travel (GMET) Policy

We must use GMET appropriately

The promotion of KLA's products and services and building business relationships in a competitive marketplace are fundamental to KLA's success. This can involve the exchange of GMET between KLA employees and external parties. We take care in exchanging GMET to avoid compromising KLA's integrity and reputation by creating actual or perceived conflicts of interest or violating the law. We never exchange GMET in an attempt to improperly influence, or give an appearance of attempting to improperly influence, a decision or outcome. Some general guidelines are below; consult [KLA's Gifts, Meals, Entertainment, and Travel Policy for Third Parties](#) for specific requirements and approval thresholds.

Exchanging GMET with third parties can build relationships, but they also can create risk – remember this in your business dealings.

Receiving GMET

YES Common business courtesies—such as the occasional, inexpensive business meal or non-monetary gifts of minimal value—from customers, suppliers, subcontractors, and others we do business with are acceptable.

NO Requesting or accepting lavish or extravagant items, or other things of value that would improperly influence—or appear to improperly influence—the business relationship between KLA and an external party, is not acceptable.

Giving GMET

(See Section 6 for rules regarding GMET for government officials)

Strictly prohibited GMET includes GMET that is illegal; could reflect negatively on KLA; is sexual-related entertainment, including massages; is used to pay for another person to socially interact with you at a bar or other locations; exploits or objectifies any person's or group of persons' gender, sexual orientation, ethnic identity, race, religion, political, or cultural affiliation; and would violate our commitment to treat others with respect and dignity and creating an inclusive environment.

Example

Question:

A KLA supplier has offered to host my team at a sports event. The tickets would cost at least \$500 USD each and food and beverages will be served. The total value of the event will be over \$10,000 USD. Can KLA accept the GMET?

Answer:

While social events with customers and suppliers represent valuable team building opportunities, you should not let the offer or provision of such gifts influence your business judgment. Given the overall size of this GMET, the offer should not be accepted unless you discuss this with your manager and secure the necessary approvals.

Gift Giving

Modest gifts that are common courtesies under local customs and laws are permitted if incidental to promoting the Company's business relationship. Please refer to GMET Policy for specific thresholds that require pre-approval. Gifts may not be in the form of cash, and any cash equivalent gift (e.g., gift cards) requires pre-approval under the GMET Policy.

Giving Meals, Entertainment & Travel

Similarly, paying for reasonable meals, entertainment, or travel of an external party is acceptable if such expenditures are connected to promoting, demonstrating or explaining KLA's products or services, or in connection with the execution or performance of a contract. Please refer to KLA's GMET Policy for specific thresholds that require pre-approval.

What You Should Do

- Be familiar with the policies and pre-approval thresholds in the [KLA GMET Policy](#). All Company-sponsored GMET and other expenditures must be properly and fully recorded in KLA's books and records.
- If your situation requires pre-approval, make sure to obtain it before exchanging any GMET.
- If you have questions, please contact your manager, Local Controller/Regional Finance Head or the Legal and Compliance Organization at corporate.compliance@kla.com.

6. Bribery and Corruption Laws

KLA strictly prohibits all forms of bribery or other illegal payments.

KLA's policy is to comply with all anti-bribery and anti-corruption laws in the countries in which it does business, and to reflect all transactions accurately and fairly in its books and records. We must never pay, offer, promise to pay, authorize, approve, request or accept bribes, kickbacks, or other illegal payments, and must not participate in or facilitate corrupt activity of any kind. We do not engage in corruption directly, nor do we engage in corrupt activity via our third parties, such as agents, consultants, suppliers, sales representatives, distributors, or other third parties who may represent or conduct business on behalf of KLA.

We also do not make facilitation payments, which are small, unofficial payments to government officials to expedite a routine, non-discretionary government action (e.g., speeding up customs clearance, speeding up paperwork processing).

KLA Definition of Government Officials

- Any employee or any person acting on behalf of a government or government agency
- Any employee or any person acting on behalf of a government-owned or -controlled enterprise or state consortium
- Any political party official, elected official, or candidate for political office
- Any employee or any person acting on behalf of a public international organization

We must not offer, give, approve or accept bribes or participate in any form of corruption.

Example

Question:

A customs official told me that if I wanted KLA's products to clear customs faster, then I should buy his supervisor a bottle of his favorite wine. Can I do this to benefit KLA?

Answer:

No, you should not provide this gift, which is a facilitation payment to a government official to expedite a routine task. You should report the request immediately to your manager and the Legal and Compliance Organization.

Dealing with Government Officials

We prohibit bribery and corruption in all contexts, whether involving government officials or private parties. In short, we must never corruptly or improperly make, promise, authorize, approve, or offer to make any payment or provide anything else of value (including GMET) to any person anywhere in the world, including a government official, directly or indirectly (i.e., through or via a third party), for the purpose of obtaining or retaining business or securing an improper advantage (e.g., favorable regulatory treatment, scoring well on a government inspection, or avoiding negative state-run media reporting). If you are uncertain about whether any special rules or restrictions apply when interacting with governments or government officials, consult the Legal and Compliance Organization.

Reasonable GMET to government officials for legitimate business purposes may be permissible, but must be consistent with KLA's [GMET Policy](#) and our [International Anti-Bribery & Corruption Compliance Policy](#).

Third Party Expectations

- In certain circumstances, we could be responsible for misconduct by our third parties. As such, we must conduct appropriate due diligence and not engage third parties whom we believe may attempt to offer a bribe or engage in corrupt conduct in connection with KLA's business.
- Our anti-corruption expectations for third parties are set forth in our [International Anti-Bribery Compliance Policy and Guidelines for Third Party Business Partners](#).
- We must be mindful of and escalate any "red flags," or indications that a third party may present heightened corruption risks, as required by our policies.

What You Should Do

Never pay or authorize bribes in any way related to KLA. If you are asked to pay a bribe or similar improper payment to any person, you should not make the payment, and report the situation immediately to Legal and Compliance Organization. And if you become aware of "red flags" that raise concerns about potential corruption risks (involving our employees, customers, counterparties, or third parties), you are expected to escalate those red flags.

If you have any questions or concerns about a particular situation, contact the Legal and Compliance Organization immediately at corporate.compliance@kla.com to help determine risk, or visit the [KLA's EthicsPoint portal](#).

Our Stewardship

We have responsibility for protecting KLA's competitive advantage and assuring the integrity of our transactions.

7. Financial Records, Accounting Practices and Applicable Laws

The accuracy and integrity of KLA's records are essential.

All transactions must be accurately and fairly recorded in the Company's books and records in accordance with our accounting policies and in compliance with U.S. Generally Accepted Accounting Principles (GAAP) and all applicable laws and regulations.

All corporate records, whether created by employees or third parties, must be accurate and honest and represent the facts. Never enter information in the Company's books or records that intentionally misleads, misrepresents, misinforms, omits or disguises the true nature of any transaction or result.

The terms and conditions contained in an agreement define the rights, obligations, and liabilities of the Company and the counterparty(ies), as well as the accounting treatment for the particular transaction(s). Business commitments made outside of the formal contracting and approval process, such as 'side deals' or 'side letters' without appropriate approvals or other unauthorized informal documentation, are strictly prohibited. Similarly, you should not make any oral or written commitment that creates a new agreement or modifies an existing agreement without following the required review and approval process from all relevant stakeholders.

Our internal control procedure for initiating and recording transactions must be adhered to at all times. Management maintains a system of internal accounting controls meant to preserve integrity and objectivity. These controls are designed to provide reasonable assurances that KLA's assets are properly safeguarded, transactions are executed and reported in accordance with management's authorization, and the books and records of KLA accurately reflect all transactions. The internal control system is augmented by a program of written policies and procedures, management reviews and training of qualified personnel.

Never mislead, misrepresent, omit or disguise the true nature of a transaction or result.

Example

Question:

To help process my expense claims, I occasionally list an expense under a different category, so it can be approved more easily and paid faster. Is this okay? It is still the same amount of money.

Answer:

This is not acceptable. KLA's accounts must accurately reflect the true nature of all expenses. Expense categories are an essential aspect of our accounting and financial systems, and they should never be compromised, even for small amounts.

What You Should Do

Full cooperation with independent and internal auditors is expected, and each of us should quickly report any suspected violations or concerns to their managers or through the confidential KLA [EthicsPoint portal](#) or one of the numerous other reporting channels to raise concerns. Additionally, if you become aware of any side deal, side letter, or other informal and unauthorized agreement made outside of KLA's applicable contract review and approval process, you should report such promptly to your manager and the Legal and Compliance Organization.

8. Protecting KLA Sensitive Information

Information is our competitive advantage.

Sensitive Information

Each of us is bound by the terms of our agreement(s) with the Company regarding the protection of intellectual property and Sensitive Information, which includes KLA Confidential, Secret and Top Secret information. We must follow KLA's policies and procedures on the protection of KLA Sensitive Information.

What is KLA Sensitive Information?

KLA Sensitive Information, which includes KLA Confidential, Secret, and Top Secret information, is any information of KLA that is not shared with the general public that you receive or discover in the course of your employment with KLA. This includes information that is developed, created, or discovered by the Company, or that becomes known by or is conveyed to the Company and that has value in the Company's business, or the business of others. Depending upon the level of sensitivity of the information, certain restrictions apply in sharing the information internally and with external parties. Consult the [KLA Data Classification Guidelines](#) for more information.

A non-exhaustive list of types of Sensitive Information is below.

Examples of Sensitive Information

- | | | |
|---|--|------------------------------------|
| ▪ Trade secrets | ▪ Techniques | ▪ Research |
| ▪ Business processes | ▪ Know-how | ▪ Service or diagnostic procedures |
| ▪ Business plans | ▪ Inventions (whether patentable or not) | ▪ Product installation |
| ▪ Product or process documentation | ▪ Designs | ▪ Marketing plans |
| ▪ Output of proprietary programs or methods | ▪ Tooling | ▪ Pricing |
| ▪ Source and object code | ▪ Schematics | ▪ Customers |
| ▪ Ideas | ▪ Algorithms | ▪ Costs or other financial data |
| | ▪ Flowcharts | ▪ Employee information |
| | ▪ Processes | |

Trade secrets are a broad category of intellectual property and include all information that derives value from not being generally known to the public, and for which we make reasonable efforts to maintain its secrecy. It is important that we all maintain those efforts to protect this critical Company asset, along with other Sensitive Information.

Inventions and Patents

We have the brightest minds in the business—inventions are inevitable and a source of pride for KLA. Information is the core of our competitive advantage, and it is everyone's responsibility to protect the Company's information assets. Patents are an additional measure that KLA utilizes to protect the inventions generated by the minds at KLA.

What You Should Do

Employee inventions, whether patentable or not, are the property of KLA to the maximum extent provided by law. All inventions must be reported to the Legal and Compliance Organization by completing the [Invention Disclosure Form](#). This is true even if you believe that the invention may fall outside the Company's business or actual or anticipated research and development, or if it was developed without Company resources. The Company's Legal and Compliance Organization will evaluate the situation whenever there is a question about invention ownership.

Remember—the scope of the Company's business and R&D activities may be broader than you realize.

The KLA Patent Committee meets regularly to review if the invention has sufficient merit. If so, then the Legal and Compliance Organization will commence the process for patenting the invention. The invention may instead be maintained as a trade secret by KLA, if the KLA Patent Committee believes this is more appropriate.

Ensure the protection of the Company's information assets by reporting all employee inventions to the Legal and Compliance Organization.

Example

Question:

I overheard a conversation yesterday and I think one of my team members is holding off on reporting an invention to the Legal and Compliance Organization. I am not sure why, but it just doesn't seem right. What should I do?

Answer:

All inventions must be promptly reported to the Intellectual Property team within the Legal and Compliance Organization. The Intellectual Property team will determine if the invention is the property of KLA. If your team member declines to report the Intellectual Property, discuss the issue with your manager or report the issue via the KLA EthicsPoint portal or call the Ethics Hotline.

Protecting Against Cybersecurity Risks

Around the globe, businesses are under constant threat from financially motivated cybercriminals and foreign governments seeking advantage through information theft. To mitigate these risks, we have developed and implemented a cybersecurity risk management process intended to protect the confidentiality, integrity, and availability of our critical systems and information. Each of us has a responsibility to protect KLA data and information systems from accidental and intentional misuse, abuse, tampering, disablement, or unauthorized access to our information systems and data.

What You Should Do

- Read, understand, and follow KLA's cybersecurity and information security policies available on [PolicyTech](#).
- Report any suspicious cybersecurity-related issues to Notify.Cyber@kla.com or [EthicsPoint](#).

9. Protecting Third-Party Sensitive Information and Intellectual Property

We must protect the sensitive information of our business partners, and we only use intellectual property of others when we have permission.

KLA is proud to be a trusted collaborator and innovator with our customers and suppliers. Collaboration with mutual trust is an essential element that enables us to execute and innovate for the benefit of each customer and the market as a whole. As collaborators, we are entrusted with others' confidential information and intellectual property, which we must protect. When acquiring and handling the information of others, do so as follows:

- For Proper Purpose
- By Proper Means
- With Proper Protection and Authorization

Proper Purpose

We obtain information from other parties for legitimate KLA business purposes, which potentially benefit those parties and enable innovation in the marketplace.

Proper Means

The information is legitimately given by the other party or observed by us in the normal course of duties, without deception or violating established protocols, agreements, or laws.

Proper Protection and Authorization

We safeguard the other party's information by honoring all nondisclosure terms, including Nondisclosure Agreement (NDA) terms, sharing it only on a "need to know" basis, and applying operational, technical and physical security best practices, including applicable laws and KLA policies. In addition, please make sure that we do not use the intellectual property of others, including patents, copyrights, trademarks and trade secrets, without proper authorization. Please seek advice from the [Legal and Compliance Organization](#) when handling information from other parties if you are uncertain how to properly protect such information.

What You Should Do

We should protect proprietary information we receive from third parties in the same way as we protect our information – as sensitive and not for general dissemination.

Protecting third party information is just as important as protecting KLA information

Example

Question:

I received some confidential information under NDA from a supplier. Can I share it with another supplier under NDA to get a competing quote?

Answer:

If the NDA with the first supplier does not permit disclosure, then you can't share the information. If you need help in understanding the Company's obligations under an NDA, check with the Legal and Compliance Organization for assistance.

10. General Principles for Protecting Sensitive Information

What you must do to protect sensitive information.

Things to Remember:

- Ensure there is a Nondisclosure Agreement (NDA) in place between KLA and any party receiving proprietary or confidential information, and that you have received all needed approvals before sharing information. Make sure the other party has a genuine need to know.
- Keep all confidential materials in secure areas. Electronic copies should be stored using appropriate access controls.
- Label documents and other files with the appropriate data classification at the time you create them. Please refer to the [data classification guidelines](#) for more information.
- Only disclose proprietary or confidential information to employees who have a genuine need to know such information.
- Never try to improperly acquire the confidential information of others.
- Don't encourage employees of a customer or supplier to disclose confidential information unless they have the required permissions.
- If you hire or work with a former employee of a competitor, customer or supplier, don't ask the person to improperly disclose confidential information.
- Always refuse unsolicited third-party confidential information. Return any information that you receive inadvertently 'unopened' or provide it to the [Legal and Compliance Organization](#).
- Never post or share proprietary or confidential information in internal discussion groups, chat rooms, bulletin boards, social media forums and/or other electronic communications media.
- Do not make public comments about KLA's proprietary or confidential information, including business plans, financials and products to the press, analysts, competitors or customers or the general public or via social media (such as LinkedIn, Facebook, X (formerly known as Twitter), Instagram, TikTok, SnapChat, Slack, Skype, Microsoft Teams, WhatsApp, Truth Social, Chat GPT, YouTube, Vimeo, Flickr, etc.) unless you are authorized to do so. For more information, please see the [Social Media Policy](#).
- Always get approval from Corporate Communications and the Legal and Compliance Organization before allowing the use of KLA's name, trademark or logo by external parties.
- Do not allow third parties to record training or other video conference sessions. If a recording is needed, KLA should handle it—ensuring proper classification and secure sharing, with appropriate disclaimers.

Ensure there is an applicable and unexpired Nondisclosure Agreement (NDA) in place with external parties before sending proprietary or confidential information

Example

Question:

I need to disclose non-public and proprietary information to a customer. What should I do to make sure that I am not compromising KLA's intellectual property or privacy obligations?

Answer:

Speak to the Legal and Compliance Organization and make sure that there is a Nondisclosure Agreement in place that covers this specific disclosure. If not, a Nondisclosure Agreement must be created to cover the proposed exchange; please contact NDA@kla.com. Do not assume that a Nondisclosure Agreement is in place or remains valid or applicable to a specific engagement, simply because of a long-standing relationship.

What You Should Do

If you have any questions about what constitutes proprietary or confidential information, please contact the [Legal and Compliance Organization](#).

11. Business Activities and Use of Company Resources

High standards of business conduct are critical to success.

Use KLA resources for carrying out the company's business

Global Trade Compliance

We must comply with applicable laws and regulations governing the import of KLA products and spare parts to maintain our international reputation, presence, and customer base. As an importer, KLA must follow the import requirements of all the jurisdictions in which we do business, including the requirements of various government agencies. KLA's import obligations include correctly classifying and valuing our products and imported items, paying import duties, and accurately describing KLA items at the time of import. KLA's Global Trade Compliance (GTC) team coordinates responses to inquiries and audits from government agencies related to the import of KLA items.

As a global company, we must also comply with applicable economic and trade sanctions laws and regulations, export controls, and antiboycott regulations (collectively, "Trade Controls") in all the jurisdictions in which we do business. Among other things, these laws can restrict dealings with certain countries, regions, governments, or persons, restrict the export, re-export, or transfer of certain items or items destined for certain end uses, and restrict U.S.-regulated parties from engaging in certain conduct in furtherance of boycotts not endorsed by the U.S. government.

KLA may be required, in certain instances, to obtain U.S. export licenses, permits or other government approvals to allow certain employees to have access to controlled technology, software or technical information, or to export a commodity, software or technical information to a particular entity, individual, or country. No employee may permit a non-U.S. person to access the Company's technology without first determining whether such access triggers a licensing or permitting requirement. If your job involves export activities, make sure the export activity follows applicable law.

Non-compliance with applicable import or Trade Controls laws and regulations can result in serious consequences for the Company and the persons involved, including fines, penalties, and imprisonment, and can have long-lasting reputational harm or other impacts on our global business.

Please direct any questions about import and Trade Controls rules to KLA's GTC team at DL.trade@KLA.com.

Example

Question:

I need to support an urgent customer tool down situation and want to hand carry components to fix this tool at a customer site overseas. May I do this?

Answer:

Hand carrying items is not the preferred method to support KLA business requirements. Please see the [International Hand Carry Policy](#) for further guidance. If there is an urgent situation, notify the Global Trade Compliance (GTC) team at least 48 to 72 hours in advance for approval.

Use of KLA Assets

KLA assets, which include materials, equipment, tools, products, real property, intangible assets, and funds including telephones, voicemail, laptops, computers, internet, intranet, email, fax and cell phones, other electronic devices, credit cards, KLA tools and spare parts (either obsolete or current), company badges, and company issued keys, are provided for carrying out KLA business. Do not use these KLA assets for personal matters unless there is an urgent need and the use complies with other Company policies. Refer to the [Policy on Use of Computer Systems and Data Assets for Employees](#) for more information. Each employee is responsible for protecting KLA assets and only using them for company purposes. If any item is damaged, lost or information is compromised, please notify [Global Security](#) immediately.

Do not use KLA assets for illegal purposes; to demean KLA's products and services; for personal gain including non-KLA commercial activity; for the unauthorized distribution of proprietary, confidential, or non-public information; to threaten or harass others; or in violation of any KLA policies.

Use of Artificial Intelligence

Artificial Intelligence or AI provides many potential benefits for both KLA and our customers. AI also presents concerns that must be addressed prior to the use, deployment, or implementation of AI on or in connection with any company resource. These concerns include, but are not limited to, privacy, security, exposing sensitive information, violating the intellectual property or other rights of third parties, ownership of the input/output, ownership of the training data or sets, provenance of the training data or sets, and transparency as to how the AI operates.

The deployment, implementation, development, and use of AI on or in connection with company resources must be done responsibly and in accordance with the KLA [Third Party Artificial Intelligence Tools Policy](#) as well as industry best practices. Furthermore, KLA has established an Artificial Intelligence Steering Committee to modify the policies, develop further policies, or provide additional guidance regarding AI.

Please contact the Artificial Intelligence Steering Committee to handle concerns or receive guidance related to the use, deployment, implementation, or development of AI at KLA.

12. Environment and Community

Our actions today should benefit the future.

By respecting our environment and the communities where we operate, we are safeguarding our future as a company and as global citizens. Being “green” is not just a trend at KLA, it’s our charge and we are making meaningful progress as we execute our Environmental, Social and Governance (ESG) roadmap. Our careful and thoughtful everyday practices demonstrate values of stewardship and teamwork, promoting both our personal and corporate health and future.

Environment

In the production of our leading process-control and process enabling solutions for the semiconductor industry, we use regulated chemicals and raw materials that can generate waste during the manufacturing process. KLA must comply with the laws and regulations regarding the proper use and disposal of these materials and as individual employees, we are all responsible for doing our part to dispose of waste properly and adhere to KLA’s internal environmental policies.

Environmental laws are complex, yet violations of these laws can subject employees to civil and criminal liability. Therefore, our Environmental, Health & Safety (EH&S) department provides training on safe work practices and environmental protections employed in the day-to-day operations of the Company.

KLA maintains certification to the ISO 14001 Environmental Management System Standard. This certification demonstrates our commitment to minimizing the environmental impact of our operations. Employees must understand and follow KLA EH&S policies, programs and procedures to help KLA comply with applicable laws and regulations. Further, KLA employees should understand how our jobs could impact the environment and steps we can take to minimize that impact.

Community

KLA is committed to making a positive contribution in the communities in which we do business. We strive to build mutually respectful relationships with our global communities, providing philanthropic program support to organizations and activities free of religious, fraternal or political associations through the KLA Foundation. To learn more about the KLA Foundation, visit the [Foundation website](#).

We value and respect life and community through our consistent acts of stewardship

Example

Question:

I visited one of our factories recently and some employees told me about problems they are having disposing of certain waste. What should I do?

Answer:

We are all responsible for complying with the laws and regulations that apply to proper disposal of waste generated in the manufacture of KLA products. You should contact the Environmental, Health & Safety (EH&S) Team at safety.information@KLA.com.

What You Should Do

We encourage employees to think about the small actions they can take each day to improve environmental practices at KLA.

If you have any questions about your part in keeping our working environment safe, please contact the Environmental, Health & Safety (EH&S) Team at safety.information@KLA.com or visit the [Safety page](#) on the KLA intranet to find out specifics on individual responsibilities.

KLA encourages employees to support their communities and charitable causes of their choice and offers to match all eligible donations through the Foundation up to \$10,000 per year. KLA also partners with the employees through the KLA Foundation whenever KLA assets are involved in these activities.

Any charitable contribution to a third party made on behalf of KLA should be administered through, and adhere to, the KLA Foundation procedures. Occasionally there may be other charitable contributions that are not made through the KLA Foundation. Please refer to the [International Anti-Bribery & Corruption Policy](#) and seek the required pre-approvals for these “Non-Foundation Contributions”.

Our Commitment

We strive to understand and comply with laws, regulations and policies that govern KLA's business worldwide.

13. Antitrust and Competition Laws

Compete honestly and fairly in every market.

Each of us is responsible for knowing and complying with [KLA's Antitrust Policy](#), which is available on the KLA [PolicyTech](#) portal or through the [Legal and Compliance Organization](#).

KLA has achieved its position as a market leader by excelling and outperforming the competition honestly and fairly. Antitrust and competition laws exist to preserve a competitive economy in which free enterprise can flourish. As a company, we strive to conduct business in full compliance with these laws, in every jurisdiction in which we operate.

It's important we are aware of antitrust risks and seek appropriate legal advice when questions arise. Competition laws are complex and violation of these laws may result in severe penalties, including criminal penalties for KLA and employees involved in the violation.

As a global company, our business activities are not only subject to U.S. antitrust and competition laws, but to the laws and regulations that promote fair competition around the world. These laws apply to our business operations across marketing, procurement, contracting and mergers and acquisitions and generally prohibit or restrict agreements (whether oral or written) that:

- Fix, coordinate or control prices
- Fix or coordinate bidding among KLA and our competitors
- Allocate or divide up customers, territories or markets
- Refrain from competing against other market participants
- Impermissibly impact competition in labor markets

What You Should Do

Read, become familiar with, and adhere to [KLA's Antitrust Policy](#), which is available on the KLA [PolicyTech](#) portal or through the [Legal and Compliance Organization](#). Be mindful of the antitrust risks and seek the counsel of the [Legal and Compliance Organization](#) if you have any questions.

Be alert to antitrust risks and obtain advice on a 'before the fact' basis.

Example

Question:

At a recent trade association meeting, a competitor was volunteering information about its pricing trends. Should I share this information with the marketing department?

Answer:

If you ever find yourself in a meeting where competitors volunteer pricing strategy information, leave immediately and let the attendees know that you object to sharing such information at the meeting. The perception may be created that you are participating in a price-fixing scheme or another activity that restricts free competition. In no case should you share the information within KLA. You should also contact the [Legal and Compliance Organization](#) immediately and let them know what has happened.

14. Securities Law

Be careful when trading in Company stock

At all times, it's crucial that we keep KLA confidential information within the Company to protect our integrity and the integrity of the financial markets.

Do not disclose 'inside' information to anyone.

Insider Trading and Tipping

The U.S. federal securities laws, as well as the laws of many other countries, place limitations on the circumstances under which our employees may purchase and/or sell KLA stock.

All employees, officers and directors in possession of KLA material non-public information must never disclose that information to persons outside of KLA or anyone who doesn't have a need to know, other than as required in the course of performing corporate duties. Material, nonpublic information is any information not generally known to the public that a reasonable investor might find significant in executing transactions to buy or sell securities in a company.

It is illegal and a violation of KLA's [Insider Trading Policy](#) for any of our employees, officers, and directors to trade in KLA's securities while in the possession of material non-public information outside of a properly approved Rule 10b5-1 Trading Plan and in certain other circumstances identified in KLA's [Insider Trading Policy](#). We are strictly prohibited from trading in KLA's stock until after the information has been publicly disseminated.

These rules also apply to information you obtain about other companies in the course of your employment with KLA. You may not trade in other companies' securities while in possession of material, nonpublic information about such companies. Our [Insider Trading Policy](#) prohibits purchasing or selling put or call options for KLA's securities.

What You Should Do

Knowing the rules on insider trading is extremely important because any employee, officer, or director who violates our [Insider Trading Policy](#) may be subject to discipline, including termination of employment and, if appropriate, legal proceedings. If you become aware of any suspected violations or have any concerns, please immediately contact the [Legal and Compliance Organization](#). For more information on insider trading and tipping, refer to the [Insider Trading Policy](#).

Example

Question:

I am working on a KLA confidential strategic project that is significant to KLA. Can I trade in KLA stock?

Answer:

Given the significance of the project, the information you have is potentially most likely material non-public information which would prohibit you from trading KLA stock. If you are unsure about a particular transaction or have questions about trading, always check with the Legal and Compliance Organization first.

15. Supplier Relations and Interactions

Supplier selection.

KLA strives to build a robust and inclusive supply chain and engage with suppliers that can offer goods and services that meet our standards, supplier selection criteria and customer requirements. Our focus is to select partners that provide best in class quality, delivery, service and technology.

Responsibility and compliance

We are committed to promoting our Environmental, Social, and Governance (ESG) programs within our internal operations and with our suppliers. As part of this commitment, and as a condition of our membership in the Responsible Business Alliance (RBA), we comply with the RBA Code of Conduct. KLA expects suppliers to comply with all applicable laws and regulations, our Standards of Business Conduct, and with the RBA Code of Conduct requirements. We expect our suppliers to communicate these expectations to their supply chain and hold them accountable to these expectations.

In addition, KLA respects human rights, which include freedom of association, right to organize, abolition of forced labor, elimination of child labor, equality and anti-discrimination rights, payment of minimum wages and provision of legally mandated benefits. Human trafficking is strictly prohibited in KLA's supply chain and our own business operations. KLA expects that suppliers and their supply chains adhere to the KLA [Global Human Rights Standard](#), and we strive to enforce such policies by (1) sourcing and supplier selection, (2) contractual supplier requirements, and (3) ongoing supplier relationship management. Refer to KLA's [Global Human Rights Standard](#) for more information.

We expect our suppliers to adhere to global principles of human rights.

Example

Question:

I found a supplier that can provide components at half the price of our current supplier, which I understand it is able to do by using school children at low wages to support their manufacturing. Since the price is so favorable, can we waive the requirement that the supplier agree to comply with the RBA Code of Conduct?

Answer:

No. KLA expects that all suppliers will conduct their business in a socially responsible manner and in compliance with the RBA Code of Conduct. The use of child labor in manufacturing and at a pay rate that may be below the legal minimum are not acceptable business practices for a supplier.

16. Government Relations and Interactions

Special considerations and care always apply.

Dealing with governments and government officials is different than dealing with other private sector customers and partners. Personnel dealing with government officials must understand our International [Anti-Bribery & Corruption Compliance Policy](#) and be familiar with all applicable requirements governing interaction with government officials, including lobbying disclosure requirements and limitations on GMET. Thus, it's important to understand the ins and outs of the "bribery and corruption laws" in Section 6.

Knowing the rules of engagement with government officials will help us understand the special consideration these relationships require.

Government Contracts

There are certain instances where KLA enters into a product, service or development contract with the United States government or other state, local, or foreign government, government agency, government contractor or government-funded universities. These contracts may be subject to special regulations and requirements. In the United States, as well as in other countries, a number of laws have been enacted to ensure the truth of any representations made to government agencies and to ensure the quality of goods and services provided to the government. They require that our business conforms to stipulated pricing, contracting and certification requirements, and there may be times when KLA is required to certify that it is providing the lowest commercial price and that such price has been determined independently.

If you are involved in presenting quotes or offers in connection with U.S. government contracts, there are also special requirements to avoid the restriction of competition. Please contact the Legal and Compliance Organization for guidance.

Lobbying Compliance

Lobbying activities on behalf of the Company may require registration and/or reporting and be subject to other restrictions. A wide variety of communications with government officials and other activities may constitute lobbying under relevant laws. Before communicating with government officials on behalf of KLA, you must consult with Government Affairs and the [Legal and Compliance Organization](#) to ensure that all advocacy on behalf of the Company is consistent and coordinated and to ensure compliance.

Whenever dealing with government, it is essential to understand what you can and cannot do.

Example

Question:

I have been asked to organize a contract with a government customer and it needs to be done quickly. Do I need to involve any other departments?

Answer:

Often special regulations and requirements apply to government contracts in the U.S. as well as other countries. You are responsible for making sure these are met and should contact the Legal and Compliance Organization with any questions about how to handle government contracts.

Political Contributions and Activities

KLA may, where permissible, make political contributions or engage in other political activities in support of the Company, its business, and its people. However, we do not make political contributions or expenditures of KLA funds to any person to attempt improperly to influence a government official or employee in connection with a government contract, grant, loan or cooperative agreement. Only authorized Company representatives may offer or commit KLA resources for political purposes and only with prior approval from KLA's Chief Legal Officer and KLA's Chief Financial Officer.

KLA respects the right of each employee to participate in political activities and civic life in accordance with your own views and preferences. However, you must ensure that your personal political activities are not undertaken on work time, that you do not use any KLA resources for such activities, and that you do not use the KLA name in a way that would suggest sponsorship or endorsement. In addition, running for elected office or serving as a public official without proper prior authorization can lead to a conflict of interest. Please see the [Conflicts of Interest Policy](#) for further details.

What You Should Do

Contact the Legal and Compliance Organization to better understand the complexities of lobbying regulations, government contracts ethics restrictions, and corporate and personal political activities to verify your personal responsibility in meeting these requirements or to identify internal stakeholders required for approval.

Our Voice

KLA employees readily accept their critical responsibility to report any suspicious, unethical, and illegal behavior to uphold KLA's values.

17. Responsibilities and Reporting

Put HFC into practice by reporting issues or concerns.

To help us establish an ethical and compliant culture and to act with uncompromising integrity, each employee has the obligation to report any behavior that violates or potentially violates our Standards of Business Conduct (SoBC). Further, you are encouraged to ask questions, seek guidance, and express any concerns about ethical conduct or compliance with our SoBC.

You can do this in a variety of ways, even anonymously if you prefer (except where restricted by local law):

- Discuss the matter with your manager, your Human Resources Business Partner or the Legal and Compliance Organization
- File a report on KLA's [EthicsPoint portal](#), a confidential online reporting tool.
- Call the Ethics Hotline toll-free to speak to someone confidentially. Call 888.278.3169 if you are located within the United States or Canada. If you are located elsewhere, refer to the International Dialing Instructions on KLA's [EthicsPoint portal](#).

If you do choose to make an anonymous report, please keep in mind that the more detailed information you provide, the better the investigation will be. Reporters are encouraged to provide as much detail as possible, including location, dates, and the identity of other people with information when reporting matters.

Nothing in this SoBC prevents you from communicating directly with relevant government authorities about potential violations of law, without notifying KLA, although KLA does encourage you to report issues of concern to us first.

Please see our [Whistleblower Policy](#) for more information.

Strict Non-Retaliation Policy

KLA will not tolerate retaliation against an employee who in good faith makes a complaint, raises a concern, provides information or otherwise assists in an investigation or proceeding, as described in the [Anti-Retaliation Policy](#). Retaliation can include discharging, demoting, suspending, transferring, threatening, harassing, intimidating, coercing, excluding, or other similar conduct.

Investigation of reports

The Company will investigate reported allegations of illegal or unethical behavior to the extent the information provided by the report allows. Confidentiality will be maintained to the greatest extent possible consistent with performing a reasonable investigation. We expect employees to cooperate fully in all such investigations, including providing the Company investigators (or their representatives) with access to relevant documents, communications, or other materials.

In certain cases, information may be shared with local law enforcement or other authorities to comply with legal requirements or to protect KLA's legal interests. A person reported to have engaged in improper behavior will be notified of a report to local law enforcement if required by law. KLA, however, will not provide the accused with the name of the reporting individual unless required to do so by law.

The data collected and processed (which may include personal information relating to the employee, witnesses, and the reporter) will be treated consistent with local data protection laws.

We retain, store, and regularly dispose of Company records in accordance with our records retention policies. If you are the subject of a legal hold relating to any investigation or audit, do not destroy or delete records related to the issue without direction from the Legal and Compliance Organization.

Consequences of non-compliance

All managers and executives are responsible for ensuring that employees reporting to them understand the SoBC and their obligations to comply with the SoBC.

Failure to comply with these standards may result in disciplinary action up to and including termination of employment. Disciplinary measures may, consistent with applicable law, also apply to managers or executives who condone or fail to properly address any illegal or unethical conduct of employees reporting to them—when the managers or executives do not act appropriately to correct misconduct or if they retaliate against any employee who in good faith reports misconduct.

We also take appropriate action against our third parties that do not meet our ethical standards, including in the RBA Code of Conduct, consistent with local law and contractual terms.