

Summary of Changes to KLA's Standards of Business Conduct (SoBC)

(August 6, 2025)

Change	Page Number
Created a streamlined and globally applicable protected statuses and characteristics and other minor clarifications.	2, 10, 11, 32
Clarified that leaders have a duty to notify KLA of potential violations of KLA's SoBC, not just actual violations	6
Deleted the Introduction page to streamline the document and moved some content to the "Our Code of Conduct" page	4
Added KLA's certification to the ISO 45001 Occupational Health and Safety (OHS&) Management System Standard at our major sites globally in the Workplace Safety section	10
Added a reference to KLA's Corporate Governance Standards under the Outside Directorships section	14
On the Bribery and Corruptions Laws page, edited the "Dealing with Government Officials" paragraphs to have a more effective topic sentence	17
Expanded the "What You Should Do" discussion on Bribery and Corruption for clarity	18
Deleted "competitors" from the list of third parties that may share confidential information with KLA, if they have the required permissions.	24
Added a prohibition for third parties to record training or other video conference sessions	24
Added "spare parts" to Global Trade Compliance page as regulations also apply to them	25
Changed "Company resources" to "KLA assets" when referring to KLA equipment for carrying out KLA business	26
In the "Use of Artificial Intelligence" section, added more items that could potentially raise concerns	26
Revised to state more clearly that each employee has the obligation to report any behavior that violates or potentially violates the SoBC	36
In section discussing consequences of non-compliance with the SoBC, added "executives" along with managers as responsible for ensuring that employees reporting to them understand the SoBC and their obligation to comply with it.	37
Minor wording changes for clarity and other non-substantive changes	4, 6, 11, 21, 30, 34