Anti-Bribery and Corruption Policy for Third Parties

AS OF SEPTEMBER 2026



1. KLA's Position on Bribery and Corruption and Expectations of Third Parties

KLA is committed to conducting business with honesty and integrity, while adhering to all applicable anti-bribery and corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), Israel Penal Law and all other local anti-bribery and corruption laws in the locations where we do business, and to reflect all transactions accurately and fairly in its books and records.

KLA expects all third parties doing business with, or on behalf of, KLA (collectively referred to as "Third Parties") to also comply with all applicable anti-bribery and corruption laws. This means that Third Parties 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. This prohibition includes facilitation or expediting payments made to government officials in furtherance of a non-discretionary routine government action.

Without limiting the foregoing, Third Parties must never corruptly or improperly make, promise, authorize, approve, or offer to make any payment or provide anything else of value to any third party, directly or indirectly (i.e., through or via a third party), for the purpose of obtaining or retaining business or securing an improper advantage anywhere in the world.

Further, it is expected that Third Parties adopt or have established appropriate policies and procedures to prevent and detect unethical business practices and potential non-compliance with applicable anti-corruption legal requirements.

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2. What Constitutes a Bribe?

A bribe is "anything of value" to obtain or retain business or obtain an improper advantage. This means that any payment, gift, promise, favor or other benefit valued by the person that someone is attempting to influence – whether or not it has commercial value. It does not matter whether the item of value is being offered by someone from KLA or a third-party business partner. Merely offering a bribe can violate the law, regardless of whether or not the bribe is accepted, or a benefit is received.

3. Forms of Bribes

Anti-bribery and corruption enforcement actions have involved bribes in many different forms, such as:

- Monetary payments
- Extravagant gifts, meals, entertainment or travel
- Charitable donations
- Hiring favors (e.g., such as hiring a friend or relative of a government official in exchange for obtaining or retaining business or receiving some other improper advantage)

4. Accurate & Complete Books & Records; Internal Accounting Controls

All Third Parties must keep books and records that accurately detail and fairly reflect what was done with their company resources and any transaction involving KLA's business. All transactions should be executed in accordance with the Third-Party management's authorization, and the Third Party should not have off-book accounts or make unauthorized payments.

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5. Violations

KLA takes its ethics and compliance obligations seriously. Any potential issue of non-compliance with this policy will be investigated thoroughly and any substantiated issue of non-compliance may result in KLA's termination of the Third-Party relationship and other potential legal consequences.

6. Reporting Ethics and Related Concerns

Third Parties are encouraged to report suspected violations and express any concerns about ethics and compliance issues via KLA's EthicsPoint, a third-party confidential online reporting tool which permits anonymous reporting if desired: kla.ethicspoint.com

Third Parties may also contact KLA's Ethics & Legal Compliance group by emailing corporate.compliance@kla.com.

KLA does not tolerate retaliation against anyone who makes a good faith report of a suspected violation of KLA policies or applicable legal requirements or against anyone who participates in an investigation.

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