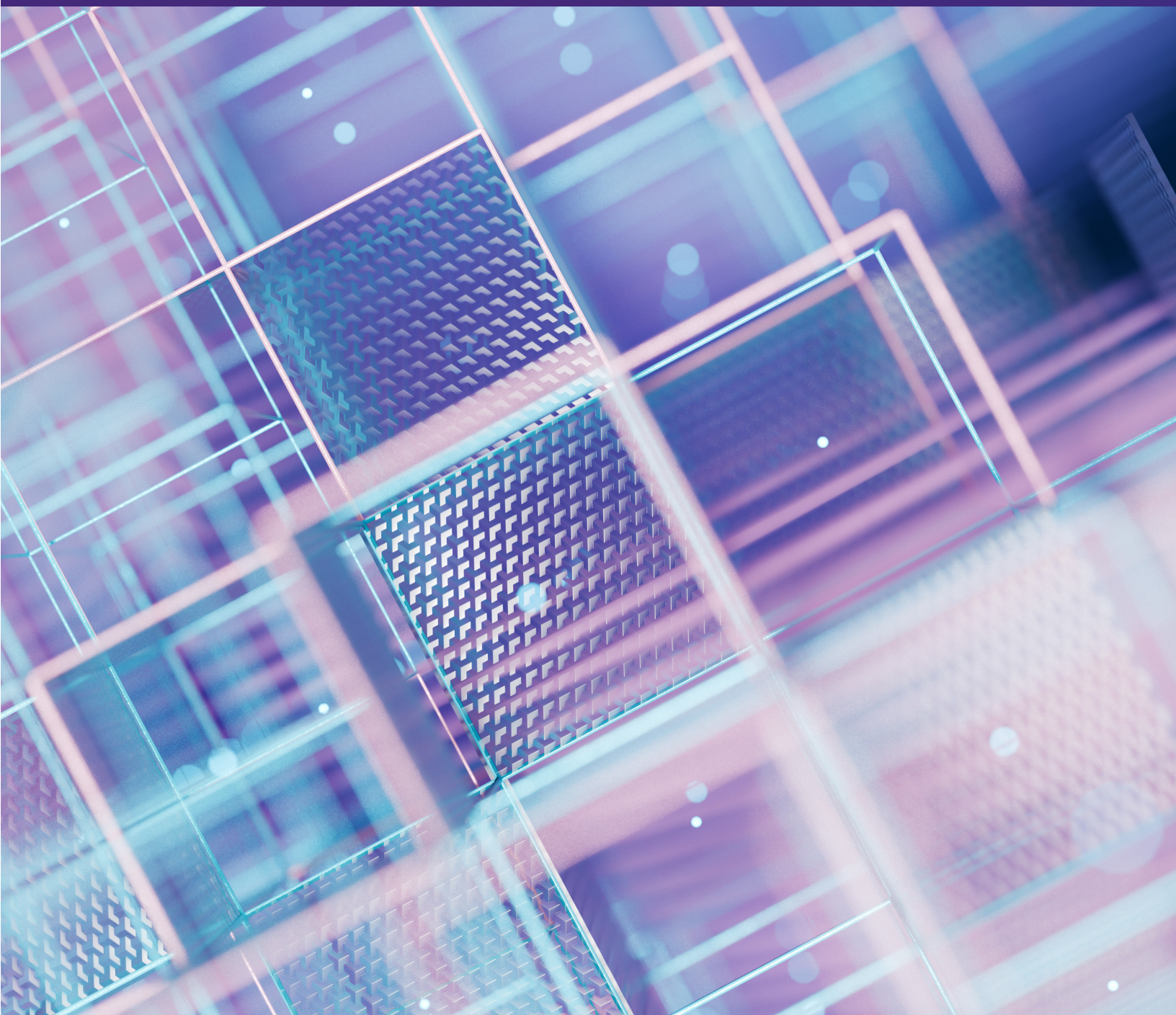
Supplier Values in Action

KLA

Standards of Business Conduct

INTEGRITY, RESPONSIBILITY, AWARENESS
COLLABORATION, INNOVATION, EXECUTION





Introduction

KLA Corporation's[1] ("KLA") Standards of Business Conduct for Suppliers[2] ("SoBC") sets forth the minimum standards of conduct that KLA expects all of its Suppliers to meet while conducting business with, or on behalf of, KLA. KLA is committed to conducting business with the highest integrity and in compliance with applicable standards and legal requirements and we expect the same of Suppliers.

Failure to comply with the provisions of the SoBC may result in the termination of KLA's business relationship with Suppliers.

Further, KLA is committed to promoting its Environmental, Social, and Governance ("ESG") program within our internal operations and with our suppliers. As part of this commitment, and as a condition of our membership to the Responsible Business Alliance (RBA), we comply with the RBA Code of Conduct. KLA expects Suppliers to also comply with the RBA Code of Conduct requirements and to communicate them to their next-tier suppliers.

1 KLA Corporation includes KLA Corporation and its worldwide subsidiaries.

2 The term "Suppliers" refers collectively to all individuals and entities who engage in business with KLA, including but not limited to suppliers, agents, distributors and non-employee workers.

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1. Compliance with Legal Requirements

It is KLA's expectation that Suppliers comply with applicable local and international legal requirements, including but not limited to, the laws and regulations relating to all standards set forth in the SoBC.



2. Business Ethics & Conduct

As a Supplier for KLA, it is expected that Suppliers conduct business with the highest standards of integrity and commit to being honest and transparent in all of their business dealings. Suppliers must not be misleading nor deceptive with KLA at any point or stage of the relationship.

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3. Conflicts of Interest

Suppliers have an obligation to avoid any conflicts of interest that would jeopardize or compromise their ability to objectively perform their contractual obligations to KLA and they have a duty to disclose to KLA any perceived, potential, or actual conflicts of interest, including relationships or affiliations that could give rise to such a conflict.

4. Anti-Bribery & Corruption

KLA expects Suppliers to comply with KLA's International Anti-bribery Compliance Policy & Guidelines. In this regard, KLA strictly prohibits all forms of bribery and any other form of illegal payment, and KLA expects Suppliers to do the same. Suppliers must never pay, offer, promise to pay, authorize, approve, request or accept bribes, kickbacks, facilitation payments, or other illegal payments, and must not participate in or facilitate corrupt activity of any kind.

Without limiting the foregoing, Suppliers 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 Suppliers adopt or have established appropriate policies and procedures to prevent and detect unethical business practices and comply with bribery and corruption laws including the

U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all applicable anti-corruption legal requirements.

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5. Trade Compliance & Anti-boycott Requirements

KLA expects that Suppliers comply with applicable import, export, trade and economic sanctions, and anti-boycott legal requirements and seek and obtain appropriate governmental authorizations when required.

6. Antitrust & Competition Laws

KLA has achieved its position as a market leader by excelling and outperforming the competition honestly and fairly. We seek competitive advantages through superior performance, not from illegal or unethical business practices. As such, KLA expects that Suppliers comply with worldwide antitrust and competition laws. In this regard, KLA expects Suppliers to be knowledgeable about what constitutes an anti-competitive activity and the associated risks, and to obtain sound legal advice before acting.

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7. Insider Trading

KLA Suppliers are expected to comply with laws and regulations relating to the prevention of insider trading and shall abstain from selling or buying, directly or indirectly, KLA securities or related financial instruments, on the basis of inside information.

8. Sustainability and Environment

As a KLA Supplier, it is expected that suppliers champion sustainability practices and make reasonable efforts to ensure that the materials and minerals they source are produced in accordance with applicable legal requirements. Additionally, Suppliers are expected to make every effort to reduce the impact on the environment including air, land and water by meeting standards established by applicable environmental legal



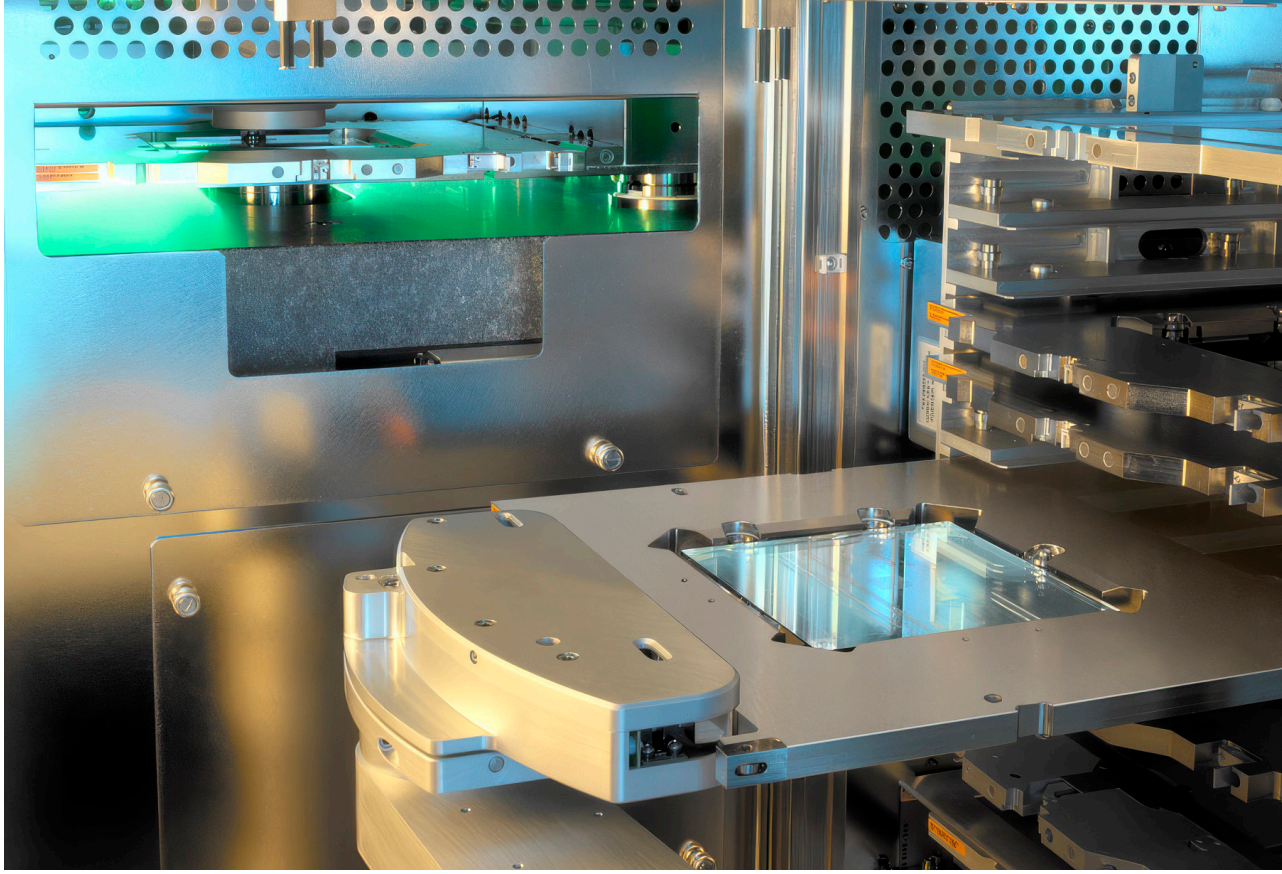
requirements. KLA launched its Scope 3 Greenhouse Gas Emissions (GHG) Supplier Engagement Program. This program focuses on engaging top suppliers through CDP on climate, as part of KLA's broader Scope 3 emissions reduction strategy and helps us and our suppliers better prepare to meet sustainable efforts and standards. KLA expects its requested suppliers to participate in an annual disclosure through CDP and begin their journey towards setting science based or science aligned climate goals. All Suppliers are encouraged to adopt adequate measures and work towards improving environmental performance. Please refer to our latest Environmental Impact Report for progress and updates on our climate journey and KLA's Environmental, Health, and Safety Commitment Policy.



9. Supplier Inclusion

At KLA, we value inclusion for all throughout our organization and supply chain. KLA requires Suppliers to adhere to applicable legal requirements, such as but not limited to, prohibiting all forms of unlawful discrimination or harassment of legally protected characteristics. Suppliers with any questions can contact KLA via email at Supplierinclusion@kla.com.

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10. Product Regulatory Compliance

KLA is committed to complying with legal requirements applicable to its products. KLA expects Suppliers to adhere to KLA's Product Regulatory Compliance Guidelines for Suppliers, including but not limited to, providing items and item packaging that conform to applicable product design and substance regulations and related information requirements in the markets where KLA operates or supplies products, as well as adhering to KLA's expectations for responsible sourcing.

11. Health & Safety

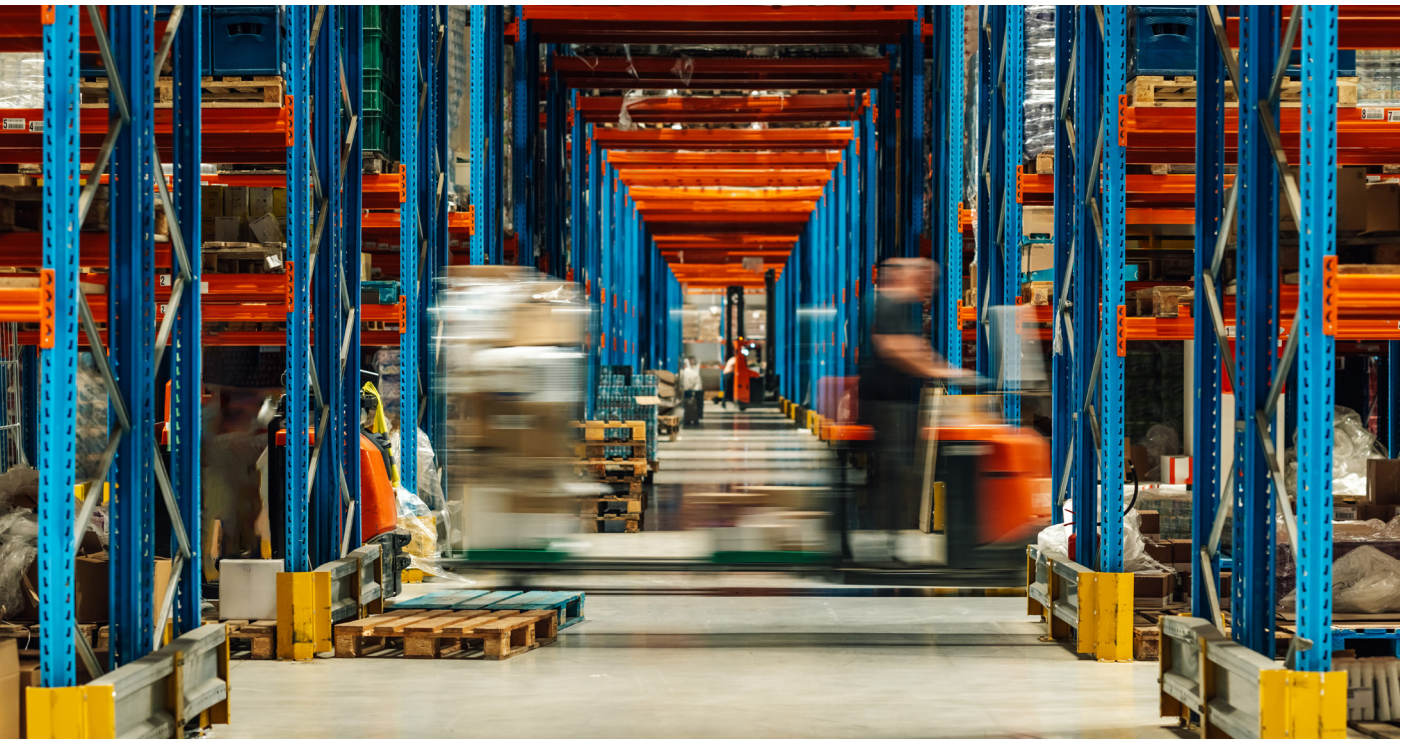
KLA is committed to providing a safe, clean environment so that everyone on its sites can conduct business in an efficient and productive manner, and we require Suppliers to do the same.

Additionally, Suppliers are expected to take measures to detect, avoid and respond to potential risks to health and safety of their workers.

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12. Human Rights and Labor Practices

KLA expects its supply base to comply with KLA's Global Human Rights Standards Policy, including adhering to global principles of human rights that include freedom of association, right to organize, abolition of forced labor, elimination of child labor, equality and antidiscrimination rights, payment of minimum wages and provision of legally mandated employee benefits.



13. Global Supply Chain Security

As a member of the U.S. Customs-Trade Partnership Against Terrorism (C-TPAT) program, KLA is committed to ensuring a safe and secure supply chain. KLA expects Suppliers to maintain a safe and secure supply chain, and encourages those who participate in the U.S. importation process to follow the security best practices identified in KLA's Global Supply Chain Security Policy.

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14. Privacy & Confidentiality / Data Protection Standards

KLA expects that Suppliers will respect the privacy rights of individuals and only use, maintain, and transfer personal data that they collect in accordance with applicable global data privacy laws and in compliance with their contractual obligations to KLA. Suppliers must protect personal data against unauthorized access or use. KLA expects that Suppliers will comply with KLA's Data Protection Standards.

15. KLA Sensitive Information

Suppliers are bound by the terms of their agreement with KLA regarding the protection of intellectual property and KLA Sensitive Information (including KLA confidential, secret, and top secret information). Suppliers may only use such information in a manner that is permitted under their contract with KLA.





16. Use of KLA Assets

If Suppliers ever use KLA telephones, voicemail, computers, internet, intranet, e-mail, fax or cell phones, it is important that they use those assets to carry out KLA business. KLA assets should not be used for personal matters unless there is an urgent need and the use complies with other aspects of this SoBC.

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

17. Accurate Books and Records

Suppliers are also expected to make and keep books, records, and accounts that, in reasonable detail, accurately and fairly represent the transactions of their business. Further, full cooperation with KLA's independent and internal auditors is expected, and KLA reserves the right to request from Suppliers information about the management and their compliance with the provisions outlined in this SoBC.

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18. Support and Raising Concerns

Suppliers are encouraged to ask questions, seek guidance, report suspected violations and express any concerns about ethics and compliance issues via KLA's EthicsPoint - KLA Corporation portal, a third-party confidential online reporting tool, including anonymously if they so choose. 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.

Non-ethics related questions can be submitted via KLA's Supplier Inquiry Form.

