

Summary of Changes to KLA’s Standards of Business Conduct (SoBC) – August 2026

Change	Page Number
Explicitly specified “sexual harassment” and “sexual orientation” in “A Great Work Environment” section to clarify protections and encourage reporting	10
Added direct links to the HR Open Door Reporting Form in both “A Great Work Environment” and “Responsibilities and Reporting” sections	10, 36
Minor revision to language in Workplace Violence paragraph to align with the “A Great Work Environment” section header	11
Clarified the scope of “Conflicts of Interest” section and minor verbiage edits to ‘Romantic and Other Personal Relationship’ and ‘What You Should Do’ section	13
Included “trading in influence” to ‘Bribery and Corruption Laws’ section	18
Added language to the ‘Dealing with Government Officials’ paragraph to clarify necessary precautions for dealing with government officials	18
Added language to the ‘What You Should Do’ paragraph for personal health and safety payment exception and reporting requirements	19
Revised the ‘What You Should Do’ paragraph to align with the “Financial Records, Accounting Practices, and Applicable Laws” section title + minor language edits	21
Minor revision to language regarding competitively sensitive information in the “Protecting Third-Party Sensitive Information” section	24
Added additional information about employee obligations regarding AI usage, data classification/information storage expectations, and training for approved AI tools	25, 28, 29
Wording change from “Company Resources” to “KLA Assets” to ensure terminology consistency	27
Clarified import compliance responsibilities and enhanced language around trade control requirements and prohibited activities in the “Global Trade Compliance” section	27
Minor revisions to ESG language to focus on how sustainability is embedded in what we make and how we operate	30
Enhanced language regarding the types of agreements that are prohibited in the employment/labor market context in the “Antitrust and Competition Laws” section	34
Revised material nonpublic information definition in ‘Securities Law’ section	34
Refined ‘Political Contributions and Activities’ language to more closely align to Global Impact Report	37
Implemented minor wording improvements for clarity and other non-substantive changes	4, 5, 7, 11, 16, 17, 19, 20, 23, 30, 32, 34, 35, 39