



Corporate Office • One Technology Drive • Milpitas, CA 95035 • [www.kla.com](http://www.kla.com)

## **Modern Slavery Statement**

This Statement is made pursuant to the United Kingdom Modern Slavery Act of 2015 and provides information regarding the efforts taken by KLA Corporation during the fiscal year ended June 30, 2020 to ensure that slavery and human trafficking are not taking place in its business and supply chains. This Statement covers KLA Corporation and its subsidiaries identified in the attached addendum.

### **Human Rights Commitment**

KLA is committed to upholding the human rights and dignity of all people, including those employed through KLA, our subsidiaries and affiliates, and our supply chains.

In addition, KLA believes that any activities that fuel social conflict, violate human rights or lead to serious environmental degradation are unacceptable. We want to ensure that all materials used in our products come from socially and environmentally responsible sources. The issue is currently especially acute with regards to so-called “conflict minerals” from the Democratic Republic of Congo and adjoining countries. Even though KLA does not source or buy metals directly, we are very concerned about the potential link between mining and the conflict in the Democratic Republic of Congo and adjoining nations. We are appalled by the reports from the conflict areas and strictly condemn all activities that fuel conflict or benefit militant groups. We require high ethical standards in our own operations and our supply chain and take action to ensure that metals from the conflict areas that fund the conflict in those regions do not enter our supply chain. KLA has actively worked independently and with suppliers, industry peers and other stakeholders to improve traceability and ensure responsible sourcing. We are participants in the Responsible Minerals Initiative and work to identify smelters in our supply chain with the Conflict Minerals Reporting Template.

KLA maintains a set of policies, procedures and processes respecting human rights and that identify, prevent, and mitigate human rights abuses. These mechanisms continue to keep KLA free from Human Rights violations and provide for continuous improvement opportunities. There were no human rights violations reported or discovered in any of our facilities worldwide during the time period covered by this statement.

### **Supply Chain Human Rights Policy**

Our supply chain is also required to adhere to the Responsible Business Alliance (RBA) Code of Conduct, and we annually assess their operations against this Code. The RBA Code of Conduct is a set of standards on social, environmental and ethical issues in the electronics industry supply chain. This Code is a set of standards that is helping our suppliers identify and mitigate risks of non-compliance within their own supply chains.

KLA expects its supply chain to adhere to global principles of human rights that 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 employee benefits.

As a company that must deliver extremely complex, high-technology products to our customers, it is critical that our supply chain maintains highly trained personnel and best-in-class processes to meet our requirements. To that end, KLA established a global supply chain program in 2002.



In 2006, KLA received the Institute of Supply Management's inaugural R. Gene Richter Award for "Innovation and Leadership in Supply Management" in the area of process for KLA's Supply Chain Management (SCM) program. Our SCM program was also named by A.T. Kearney as a 2008 "Leader in Procurement Excellence." The supply chain management processes establish, support, ensure and continuously improve the adherence of our supply base to all critical tenets of human rights. KLA expects its supply chain to adhere and comply with global human rights standards, including but not limited to:

- The industry best practices for major electronics companies, its customers and suppliers as defined and adopted by the RBA Code of Conduct which can be found at <http://www.responsiblebusiness.org/code-of-conduct/>.
- The requirements of the California Transparency in Supply Chains Act of 2010 which can be found in Section 1714.43 at <https://oag.ca.gov/SB657>.
- The requirements of the UK Modern Slavery Act of 2015 which can be found in Part 6, Section 54 Transparency in Supply Chains at [www.legislation.gov.uk/ukpga/2015/30/contents/enacted](http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted).

KLA expects that suppliers and their supply chains adhere to the KLA Human Rights Policy, and we strive to enforce such policies via a rigorous three-pronged approach of (1) sourcing and supplier selection, (2) contractual supplier requirements and (3) ongoing supplier relationship management

### **Sourcing & Supplier Selection**

To become a key supplier for the production of KLA's goods and services, suppliers are evaluated through a selection and qualification process that is a critical part of our SCM process. Typically, such evaluations include supplier visits and/or supplier quality audits of the supplier's people, processes and capabilities against pre-determined evaluation criteria. During the course of these assessments, the team qualifies how well the supplier meets KLA's standards. Only the suppliers that meet KLA's standards and that optimize or meet the overall selection criteria are selected. Those suppliers then become part of KLA's supply chain and are, as appropriate, managed for continuous improvement.

### **Contractual Supplier Requirements**

Purchase Order Terms and Conditions: As a condition of doing business and as a means of self-certification, our purchase order standard terms and conditions stipulate that<sup>1</sup> "Seller represents and warrants that it complies with all applicable laws and regulations, including eradication of forced, bonded, indentured, involuntary convict or compulsory labor, as well as illegal child labor in its facilities, and requires their suppliers, including labor agencies, to do the same. Seller warrants that its supply chain and materials incorporated into its products comply with the laws prohibiting slavery and human trafficking. Seller agrees to adopt sound human rights practices, to treat workers fairly and with dignity and respect, provide a safe

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<sup>1</sup> Subject to variation in the standard terms of business applicable to recently acquired entities.



and healthy work environment for their workers, conduct business in compliance with applicable environmental and employment laws, and refrain from corrupt practices.”

### **Standard Supplier Purchase Agreement:**

Additionally, key KLA suppliers must sign KLA’s standard purchase agreement that specifically states that the supplier “represents and warrants that it complies with all applicable laws and regulations, including eradication of forced, bonded, indentured, involuntary convict or compulsory labor, as well as illegal child labor in its facilities, and requires their suppliers, including labor agencies, to do the same. Seller warrants that its supply chain and materials incorporated into its products comply with the laws prohibiting slavery and human trafficking,” and the supplier “agrees to adopt sound human rights practices, to treat workers fairly and with dignity and respect, provide a safe and healthy work environment for their workers, conduct business in compliance with applicable environmental and employment laws, and refrain from corrupt practices.” Furthermore, it also stipulates that suppliers “shall comply with all applicable laws regarding non-discrimination in terms and conditions of employment, payment of minimum wage and legally mandated employee benefits, and compliance with mandated work hours. Seller shall comply with all applicable laws regarding employment of underage or child labor and shall not employ children under the age of 16.”

### **Supplier Relationship Management:**

Key KLA suppliers, as appropriate, participate in the KLA Supplier Scorecard program. The Scorecard includes several qualitative and quantitative measurement criteria related to a supplier’s performance against defined criteria. Non-quantifiable ratings include KLA’s policies. Any deterioration below certain levels requires a Supplier Action Request. Supplier Action Requests are managed throughout the business review process. KLA may discontinue business with suppliers that fail to either improve their Supplier Scorecard rating over a defined period or do not resolve requests in a timely manner. The Supplier Relationship Management program includes planned business reviews, site visits and performance audits that include adherence to human rights policies. Site visits and performance-related audits usually occur when and if a supplier’s scorecard performance is declining and/or if supplier risk is determined through the course of normal supplier visits.

### **Standards of Business Conduct for Suppliers:**

KLA Suppliers, Agents and Non-Employee Workers are asked to review, accept and adhere to KLA’s published Standards of Business Conduct as listed at <https://www.kla.com/company/supplier>. KLA is committed to conducting business in compliance with all applicable standards, laws and regulations. Although laws and customs vary from country to country and standards of ethics may vary in different business environments, the fundamental principles of honesty and integrity serve as the cornerstones of KLA’s Standards of Business Conduct. By holding KLA, our business partners, and our Suppliers to a higher set of values, we must place our values in action by asking questions, seeking guidance, reporting suspected violations, and expressing our concerns when it is our duty to do so. We require all KLA Suppliers to create an environment where fair employment practices are extended to all workers.



For more information on related actions and policies of KLA, please refer to our CSR Report at <https://www.kla.com/company>.

Signed on 11/5/2020, 2020 by

DocuSigned by:

*Richard P. Wallace*

Richard P. Wallace

President, CEO, and Member of the Board of Directors  
KLA Corporation



Addendum  
List of Covered Subsidiaries

<b>Subsidiary Name</b>	<b>Jurisdiction of Incorporation or Organization</b>
International Sales & Business, Inc.	California
KLA-Tencor China Corporation	California
KLA-Tencor International Corporation	California
VLSI Standards, Inc.	California
Belize Holdings, LLC	Delaware
KLA-Tencor Asia-Pac Distribution Corporation	Delaware
KT Venture Group, L.L.C.	Delaware
KT Venture Group II, L.L.C.	Delaware
Dino Acquisition Technology L.L.C.	Delaware
Zeta Instruments, Inc.	Delaware
KT Recreation Association, LLC	Delaware
Whiskey Holding Sub, LLC	Tennessee
Microsense, LLC	Delaware
Nanomechanics Inc.	Tennessee
Filmetrics, Inc.	California
Orbotech, Inc.	Delaware
Photon Dynamics, Inc.	California
Photon Dynamics Solar Corporation	Delaware
Orbotech LT Solar, LLC	Delaware
SPTS Technologies, Inc.	California
Primaxx, Inc.	Delaware
Xactix, Inc.	Pennsylvania
KLA Aleris Holding LLC	Delaware
ICOS Vision Systems Corporation BVBA	Belgium
ICOS Vision Systems NV	Belgium
Lee Ta Technologies (BVI), Inc.	British Virgin Islands
KLA-Tencor Corporation (Cayman) Limited, I	Cayman Islands
KLA-Tencor Corporation (Cayman) Limited, III	Cayman Islands
KLA-Tencor Corporation (Cayman) Limited, IV	Cayman Islands



<b>Subsidiary Name</b>	<b>Jurisdiction of Incorporation or Organization</b>
KLA-Tencor Corporation (Cayman) Limited, V	Cayman Islands
ICOS Vision Systems (Shenzhen) Co. Ltd.	China
KLA-Tencor International Trading (Shanghai) Co., Ltd.	China
KLA-Tencor Semiconductor Equipment Technology (Shanghai) Co., Ltd.	China
KLA-Tencor France SARL	France
KLA-Tencor GmbH	Germany
KLA-Tencor MIE GmbH	Germany
KLA-Tencor MIE Holdings GmbH & Co. KG	Germany
KLA-Tencor MIE Holdings Verwaltungs GmbH	Germany
ICOS Vision Systems Ltd.	Hong Kong
KLA-Tencor Software India Private Limited	India
KLA-Tencor Ireland Ltd.	Ireland
Optical Metrology Patents Limited	Ireland
KLA-Tencor Corporation (Israel)	Israel
KLA-Tencor Corporation Holding (1987) Ltd.	Israel
KLA-Tencor Corporation (1992) Ltd.	Israel
KLA-Tencor Integrated Metrology (Israel) (2002) Ltd.	Israel
KLA-Tencor Italy S.R.L.	Italy
KLA-Tencor Japan, Ltd.	Japan
KLA-Tencor Korea, Inc.	Korea
KLA-Tencor MIE Holdings S.à r.l.	Luxembourg
KLA-Tencor (Malaysia) Sdn Bhd	Malaysia
KLA-Tencor (Singapore) Pte. Ltd.	Singapore
KLA-Tencor Singapore Holding Company Pte. Ltd.	Singapore
KLA-Tencor Singapore Holding Company II Pte Ltd.	Singapore
KLA-Tencor (Thailand) Limited	Thailand
KLA-Tencor Limited	United Kingdom
Lakers Holding Company APS	Denmark
Capres A/S	Denmark
Filmetric Europe GmbH	Germany
Filmetrics Korea Ltd	South Korea
Orbotech Ltd	Israel



<b>Subsidiary Name</b>	<b>Jurisdiction of Incorporation or Organization</b>
Orbotech Ltd	Israel
Orbograph Ltd.	Israel
Frontline P.C.B. Solutions (1998) Ltd.	Israel
Frontline P.C.B. Solutions LP	Israel
Laser Imaging Systems GmbH	Germany
New System SRL	Italy
Orbotech Deutschland GmbH	Germany
Orbotech S.A.	Belgium
Orbotech Pacific Ltd.	Hong Kong
Orbotech Electronics (Shenzhen) Co., Ltd	China
Orbotech Electronics (Suzhou) Co Ltd	China
Orbotech Trading (Shanghai) Co., Ltd	China
Orbotech Japan Ltd	Japan
Orbotech Asia Ltd	Hong Kong
Orbotech Singapore Corporation Pte Ltd	Singapore
Orbotech Korea Ltd	Korea
Orbotech Logistics Ltd	Hong Kong
SPTS Technologies GmbH	Germany
SPTS Technologies SAS	France
SPTS Technologies Limited	UK
SPTS Technologies Ltd	Taiwan
SPTS Technologies Pte Ltd.	Singapore
SPTS Technologies (Shanghai) Co. Ltd.	China
Orbotech Holding UK Ltd.	UK
PixCell Medical Technologies Ltd.	Israel
SPTS Technologies Group Ltd.	UK
SPTS Technologies Holdings Ltd.	UK
SPTS Technologies Investment Ltd	UK
SPTS Technologies Sapphire Ltd	UK
SPTS Technologies UK Ltd	UK
SPTS Technologies ET Ltd	UK
SPTS Technologies Overseas Holdings Ltd.	UK
Orbotech Technology Ventures Ltd.	Israel



<b>Subsidiary Name</b>	<b>Jurisdiction of Incorporation or Organization</b>
Orbotech Technology Ventures LP	Israel
Orbotech Holding GmbH	Germany
Orbot Europe S.A	Belgium
Orbotech B.V.	Netherlands
Orbotech Caribbean Ltd.	British Virgin Islands
Qoniac GmbH	Germany
Qoniac Korea Ltd.	Korea
Qoniac Taiwan Ltd.	Taiwan
Qoniac Japan Ltd.	Japan
KLA Singapore Holding Company III Pte. Ltd.	Singapore