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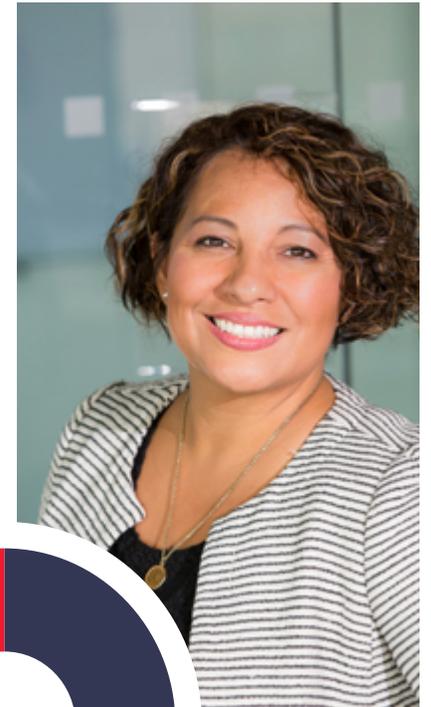
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2025

# Onto Innovation Code of Business Conduct and Ethics

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# INTRODUCTION

This Code of Business Conduct and Ethics applies to all Onto Innovation employees, directors, officers, consultants, and contractors worldwide. It guides our business practices to ensure honesty, integrity, and compliance with the law. We must all read, understand, and use this Code to make decisions, conduct business, and maintain a positive work environment. Compliance is mandatory, and violations can lead to disciplinary action.

If you have questions or concerns, seek guidance and cooperate fully in any investigations. This Code applies during work hours, at Company events, and any place where you represent Onto Innovation. Compliance with this Code is a condition of employment, and it may be updated without notice.

Every colleague must make a reasonable effort to follow all applicable laws and regulations, including U.S. and local laws. While we can't list every policy or law, this Code outlines the key principles we all need to know and follow.

## OUR CODE OF CONDUCT AND ETHICS

### Onto Innovation adopted this Code to:

- Encourage honest and ethical behavior.
- Ensure full, fair, timely and accurate reporting of financial information to the SEC and in public communications.
- Encourage compliance with applicable laws, rules and regulations.
- Foster fair dealing practices.
- Hold everyone accountable to the Code's policies.
- Protect Onto Innovation and its customers' business interests, assets and confidential information.
- Deter wrongdoing.

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## COMPLIANCE WITH LAWS, RULES AND REGULATIONS

### AT A GLANCE

While on Onto Innovation premises or conducting business on behalf of Onto Innovation, respect, obey and comply with all applicable laws, rules and regulations.

Obeying the law is the foundation of our ethical standards. We must respect and follow the laws of the places where we operate. If you're unsure about any action, seek advice from management or the General Counsel.

Here are some key laws and regulations we must follow:

- **Securities Laws:** Follow SEC and NYSE rules for business and financial reporting. Comply with the Insider Trading Policy.
- **Anti-Corruption Laws:** Bribery and improper influence are prohibited. Follow laws like the U.S. Foreign Corrupt Practices Act.
- **Antitrust Laws:** Promote fair competition. Avoid agreements that fix prices, coordinate bids, or divide markets.
- **Export Control Laws:** Comply with U.S. export regulations and any trade laws in the countries where we do business.
- **Privacy Laws:** Protect personal information of customers, employees, and contractors. Follow Company policies and legal requirements.
- **Government Contracts Laws:** Adhere to high ethical standards when dealing with government contracts and officials.

Onto Innovation does not tolerate any violations of the law. If you have questions about compliance, consult the General Counsel.

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## CONFLICTS OF INTEREST

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Avoid any real or perceived conflicts of interest. This means not taking actions or having interests that could affect your ability to work objectively and effectively, or that could give you improper personal benefits because of your role at Onto Innovation.

A conflict of interest happens when your personal interests (or those of your family) interfere with Onto Innovation's interests. These conflicts are prohibited unless waived in writing by Onto Innovation. Here are some examples:

- **Personal Interests:** Working for a competitor or supplier.
- **Improper Benefits:** Hiring or supervising a family member, or accepting gifts, favors, or loans from companies that do business with Onto Innovation.
- **Competing Activities:** Working for a competitor, customer, or supplier while employed by Onto Innovation.
- **Financial Interests:** Holding a financial interest in Onto Innovation's customers, suppliers, or competitors, unless it's a publicly owned corporation and your (or your family member's) interest is less than 1% of its shares.

If you think you might have a conflict, refer to the Compliance Procedure guidelines or talk to the General Counsel.

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## OPEN AND HONEST DEALING

### AT A GLANCE

Onto Innovation promotes a culture of openness and honesty, where important information is shared freely with management and no misleading information is purposely given.

Honesty means conveying the truth accurately and avoiding misleading information. Openness involves voicing concerns, asking questions, and being receptive to others. Effective communication is essential in all interactions at Onto Innovation, whether collaborating on projects, reporting job status, providing feedback, or discussing issues. Withholding information or ignoring insights can harm relationships and negatively impact our business.

Onto Innovation is committed to accurate and timely disclosure in all public communications and information provided to stockholders. As a public company, we follow securities laws and regulations for reporting. We aim for the

highest standards of accuracy, quality, and integrity in our business and financial reporting. If you assist in preparing reports or public information, disclose all material facts to senior management. If you believe material information should be disclosed, report it to the Chief Financial Officer or follow the Financial Information Integrity Policy. If unsure about whether a fact is "material," consult the Chief Financial Officer or General Counsel.

We must be open and honest with our accountants and auditors, as misleading or manipulating them is against the law.

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## INSIDER TRADING

### AT A GLANCE

Material, nonpublic information may not be used or shared for stock trading purposes.

As colleagues, we may sometimes learn important information about our Company or other companies (like our customers and suppliers or other companies in our industry) that isn't known to the public. If this information is something an average investor would consider important when deciding to buy, sell, or hold securities, it's likely considered material, nonpublic information. Using or sharing this kind of information for stock trading is against Company policy and prohibited by law. For more details on what qualifies as material, nonpublic information and our policy on trading securities, please refer to the Insider Trading Policy, available on the [Onto Innovation Intranet](#) or upon request.

In addition to potential civil and criminal penalties, violating the Insider Trading Policy can lead to disciplinary action, including termination of employment.

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## FAIR DISCLOSURE

### AT A GLANCE

Statements regarding material, nonpublic information about Onto Innovation or its securities may not be made to the financial community, Onto Innovation stockholders, the media or anyone else outside of the Company without approval from the General Counsel or Chief Financial Officer.

Onto Innovation may receive calls from the press, analysts, investment bankers, or stockholders about our financial performance. We must follow strict rules about sharing non-public information. Regulation Fair Disclosure requires that all investors have equal access to important disclosures at the same time. Only the Chief Executive Officer, Chief Financial Officer, or a designee of the Chief Executive Officer or Chief Financial Officer can speak on behalf of Onto Innovation about financial performance, products, or business transactions. If you receive such inquiries, refer them to the Chief Executive Officer, Chief Financial Officer, or General Counsel.

Onto Innovation does not respond to rumors. If you receive inquiries about rumors, do not respond and contact the Head of Investor Relations and Corporate Communications.

If a statement or disclosure is made by mistake, notify the Chief Executive Officer, Chief Financial Officer, or General Counsel immediately to meet any reporting requirements.

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## PAYMENTS TO AGENCIES/CONSULTANTS

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All payments and arrangements with outside agents, consultants, contractors, vendors and other parties should be in writing and follow our internal policies.

When working with outside agents, consultants, contractors, and other parties, make sure to have a written agreement.

This document should clearly outline:

- The results expected
- The commission or fees to be paid
- How and when fees will be paid
- The term of the agreement
- The commitment to comply with all applicable laws and regulations
- All payments should follow proper business practices and be based on the reasonable value of the services performed. Make sure payments are supported by adequate documentation.

By following these guidelines, we ensure Onto Innovation gets the best value for its expenditures, clearly defines expectations and terms, minimizes potential liability, and protects our interests.

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## CORPORATE OPPORTUNITIES

### AT A GLANCE

You can't use Company property, information, or your position to benefit yourself personally without Onto Innovation's approval.

We must not use our position at Onto Innovation to take personal advantage of opportunities discovered through our work, Company property, or information without approval from the Board. Respect Company property and information, and ensure neither you nor your family uses them for personal gain. Discounts from suppliers or customers should only be accepted if offered to all employees. If you come across a business opportunity through your role, you must offer it to Onto Innovation first. If the Company declines in writing, then you may pursue it. If you're unsure whether an activity benefits you personally or the Company, consult the General Counsel before proceeding.

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## COMPETITION AND FAIR DEALING

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Respect the rights of and deal fairly with Onto Innovation's customers, suppliers, competitors and your Onto Innovation colleagues.

Treat Onto Innovation's customers, suppliers, competitors, and colleagues with respect and fairness. Avoid taking unfair advantage through manipulation, concealment, or misrepresentation. Our products and services must meet customer requirements and comply with regulations. Follow laws promoting fair business practices, like antitrust laws, which protect free competition. We aim to outperform our competition fairly and honestly, seeking advantages through superior performance, not unethical practices. We do not steal proprietary information or induce disclosures from competitors' employees. When making purchases for Onto Innovation, prioritize the Company's

interests and seek maximum value while treating vendors fairly and courteously. You also may not work for a competitor, customer, or supplier while employed by Onto Innovation Inc. to avoid any actual or potential conflict of interest.

If you have questions about competitive activities, contact the General Counsel.

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## GIFTS, GRATUITIES AND ENTERTAINMENT

### AT A GLANCE

Only offer or accept reasonable gifts and business entertainment from customers, suppliers, or others. These should be aimed at building goodwill and strong working relationships, not gaining an unfair advantage.

Business entertainment and gifts should be focused on building goodwill and strong relationships, not gaining unfair advantage. Never offer or accept gifts, favors, or entertainment that could obligate or appear to obligate the recipient or influence fair judgment. Avoid giving or accepting cash or its equivalent. Only accept or offer gifts if they:

- Are not cash
- Follow customary business practices
- Are not excessive in value
- Cannot be seen as a bribe or payoff
- Comply with laws and regulations
- Follow this Code (including the section below entitled "Bribery and Improper Payments") and any applicable agreements

Nominal gifts, like holiday tokens, are acceptable occasionally. Routine business entertainment, like lunches or sports outings, is fine if it doesn't influence decisions. Use discretion with alcohol at Company events. For example, a supplier's lunch invitation is acceptable if it doesn't create bias, but cash gift cards are not. Always check applicable laws and norms for interactions with government officials, which often prohibit gifts, including food or beverages.

If unsure about a gift, discuss it with management before giving or accepting it.

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## POLITICAL CONTRIBUTIONS

### AT A GLANCE

Onto Innovation encourages everyone to vote and be involved in politics, but we don't use Company funds, assets, or services to support any political party, committee, organization, or candidate at any level.

Onto Innovation encourages everyone to vote and be active in politics. If you hold public office, disclose any potential conflicts of interest to your supervisor. You can support political activities through personal contributions or volunteering, but not on Company time or using Company resources. Personal political contributions will not be reimbursed.

Onto Innovation does not make political contributions to any party, committee, organization, or candidate. This includes direct and indirect payments, loans, gifts, or services. Company facilities and assets

cannot be used for political purposes. Onto Innovation may participate in lobbying activities with authorization from the General Counsel. Do not lobby on your own behalf during Company time.

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## PROHIBITION AGAINST DISCRIMINATION/HARASSMENT

### AT A GLANCE

Harassment or discrimination based on race, color, national origin, sex (including pregnancy), religion, age, disability, sexual orientation, caregiver status, gender identity, marital status, familial status, military service, genetic information, or any other protected characteristic is prohibited.

Onto Innovation values diversity and is committed to providing equal opportunity in all aspects of employment. We do not tolerate any form of discrimination or harassment based on race, color, national origin, gender, religion, age, disability, sexual orientation, caregiver status, marital status, familial status, gender identity, military service, genetic information, or any other protected characteristic.

Everyone has the right to a work environment free from harassment. This policy applies to all employees, applicants, interns, contractors, customers, vendors, and visitors. Harassment includes any unwelcome conduct that creates an intimidating, offensive, or hostile work environment, even if the individual is not the intended target.

Sexual harassment includes inappropriate conduct of a sexual nature, unwanted advances, requests for sexual favors, or any behavior that affects employment decisions or creates a hostile work environment.

Examples of harassment include:

- Threatening or intimidating behavior
- Verbal taunting, slurs, or inappropriate jokes
- Displaying discriminatory or derogatory images
- Negative stereotyping

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Harassment or discrimination based on race, color, national origin, sex (including pregnancy), religion, age, disability, sexual orientation, caregiver status, gender identity, marital status, familial status, military service, genetic information, or any other protected characteristic is prohibited.

Onto Innovation aims to create a workplace free from harassment, intimidation, violence, and other disruptive behaviors. Report any harassment immediately to Human Resources or through the reporting channels of this Code. Onto Innovation will investigate promptly and address the issue. Reporting is everyone's responsibility, and confidentiality will be preserved as much as possible.

Retaliation for reporting or assisting in the investigation of harassment is prohibited. If you experience or witness retaliation, report it immediately.

Violations of this policy can lead to disciplinary action, up to and including termination. Supervisors and managers who fail to report observed harassment will also be subject to disciplinary action. For more information, refer to the Anti-Harassment and Anti-Discrimination Policy in the Employee Handbook or contact Human Resources.

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## HEALTH AND SAFETY

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Keep our workplace safe and healthy by following safety rules, reporting issues, and avoiding any violent or threatening behavior.

Onto Innovation is committed to providing a safe and healthy work environment. We all have a responsibility to follow safety rules, report accidents, injuries, and unsafe conditions, and avoid using equipment in ways that could cause distraction or harm.

Violence, intimidation, and threatening behavior are not allowed. This includes verbal or physical threats, harassing communications, stalking, and destruction of property. Weapons, firearms, ammunition, explosives, and incendiary devices are forbidden on Onto Innovation property or while conducting business offsite. Report any threatening behavior immediately to your supervisor, Human Resources, or through the reporting channels of this Code. In cases of imminent danger, notify local law enforcement.

We must report to work free from the influence of alcohol, cannabis, illegal

drugs, or substances that impair our ability to perform our duties. Alcohol and drug abuse can endanger the health, safety, and security of our colleagues and customers, and harm Onto Innovation's reputation. The use, possession, sale, or distribution of alcohol, cannabis, illegal drugs, or unauthorized drugs is prohibited during work hours or on Company premises. Even if cannabis is legal in your area, you cannot use it while on Company property or time. Prescription medication is allowed if it does not impair your ability to work safely. If you have an alcohol or drug problem, you may seek help through the Employee Assistance Program (EAP).

Avoid any off-the-job misconduct that could affect your ability to work or Onto Innovation's reputation.

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## RECORD KEEPING

### AT A GLANCE

When we need to record or report business information, it must be done honestly, promptly, and accurately to support responsible business decisions.

Our records are our corporate memory, providing evidence of actions and decisions and containing critical data for our business continuity. Records include all forms of information created or received by Onto Innovation, whether originals or copies, regardless of media. Examples include paper documents, emails, electronic files, and any other medium containing information about Onto Innovation or our business activities. All records are the property of Onto Innovation.

#### **Recording and Processing Information:**

Many of us are involved in recording, processing, or analyzing financial or other information, or in reviewing and auditing these activities. These processes help in business decision-making and evaluating Onto Innovation's performance by our Board and senior management. They also ensure compliance with legal requirements

for information retention and disclosure to investors and regulators. Periodic audits may be conducted, and all colleagues must cooperate fully and provide truthful and accurate responses.

**Honest and Accurate Reporting:** Onto Innovation requires honest and accurate recording and reporting of information for responsible business decisions. Adhere to the highest ethical standards in generating and maintaining Company records. Do not create or alter records to mislead or conceal information. Report the true number of hours worked and accurately document travel expenses. If unsure about an expense, consult your supervisor or the Finance department.

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When we need to record or report business information, it must be done honestly, promptly, and accurately to support responsible business decisions.

**Confidentiality and Compliance:** All books, records, accounts, and financial statements are confidential and must be maintained in reasonable detail, reflecting Onto Innovation's transactions and conforming to legal requirements and internal controls. Do not maintain unrecorded or "off the books" funds or assets unless permitted by law. Those with financial responsibilities must follow Onto Innovation's Financial Information Integrity Policy.

**Public Records and Communications:** Business records and communications may become public, so avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations. This applies to emails, voice messages, internal memos, and formal reports. Retain or destroy records according to Onto Innovation's policies. In case of litigation or investigation, consult the General Counsel.

**Fraud and Theft:** Onto Innovation promptly investigates any incidents of fraud or theft and prosecutes individuals to the fullest extent of the law.

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## CONFIDENTIALITY

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When you receive confidential information, keep it secure and private. This includes materials from Onto Innovation, our customers, suppliers, and others. Only share this information if you have proper authorization.

Onto Innovation's proprietary and confidential information is a valuable asset and must be used only for business purposes. Colleagues often learn or have access to confidential information about the Company, our customers, suppliers, or other third parties. This information must be kept confidential unless disclosure is authorized by the General Counsel or required by law. Do not download, upload, copy, transmit, publish, or transfer confidential information to any network, server, computer, external storage device, or other media not owned or controlled by Onto Innovation, unless authorized in writing by the General Counsel. Confidential information includes trade secrets, financial data, product performance details, future plans, business strategies, marketing strategies, technical data, customer information, and more. If the information is unknown outside Onto

Innovation, could harm the Company or its customers if disclosed, or is covered by a nondisclosure agreement, it is confidential.

Guidelines for handling confidential information:

- Ensure a nondisclosure agreement is signed before sharing confidential information.
- Limit access to confidential information to those who need to know.
- Keep confidential documents in secure areas.
- Label confidential documents appropriately.

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Do not disclose confidential information to third parties without a nondisclosure agreement or to anyone who does not need to know. Avoid discussing confidential information in public places or on social media. The obligation to protect confidential information continues even after employment ends.

This policy does not limit communication with regulatory or enforcement agencies.

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## PROTECTION AND PROPER USE OF COMPANY ASSETS

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Protect Onto Innovation's assets, including our work product and proprietary information, to ensure they remain secure and efficiently used.

Onto Innovation invests heavily in developing, maintaining, and protecting its assets. As colleagues, we are responsible for safeguarding these assets, including physical items, proprietary information, and our brand and reputation. Our work products, such as materials, designs, information, and concepts, belong exclusively to Onto Innovation. Other assets include emails, computers, communication systems, documents, equipment, facilities, and our logo and name. We must protect these assets, ensure their efficient use, and help control costs. Treat Onto Innovation assets with the same care as your own. Do not sell, loan, use, give away, or dispose of Company property without authorization. Report any suspected abuse, fraud, or theft to management. Company equipment should not be used for non-business purposes, though reasonable personal use may be permitted. Remember, there is no expectation of privacy when using

Company equipment, and Onto Innovation may monitor communications and/or any information, documents or other materials on Onto Innovation's systems or property.

Misuse of Onto Innovation assets includes using facilities for personal gain, taking office supplies for personal use, unauthorized copying of software, and not paying balances on Company-issued credit cards after reimbursement. Protecting Onto Innovation's assets also means safeguarding proprietary information, such as trade secrets, patents, trademarks, business plans, business strategies, designs, databases, personnel information, and financial data. This information may be stored electronically or in documents and must be protected. Follow security policies, use passwords, safeguard the passwords and other access credentials, and avoid removing information from premises without authorization.

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Protect Onto Innovation's assets, including our work product and proprietary information, to ensure they remain secure and efficiently used.

Shred documents containing confidential or personal information before discarding them. Under the federal Defense of Trade Secrets Act, you are protected when disclosing trade secrets to government officials or attorneys for reporting violations of law. You are also protected when disclosing trade secrets in legal proceedings if the information is filed under seal. If you file a lawsuit for retaliation, you can disclose trade secrets to your attorney and use them in court if filed under seal and not disclosed except by court order.

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## BRIBERY AND IMPROPER PAYMENTS

### AT A GLANCE

Always act with integrity. Don't accept or offer bribes, kickbacks, or engage in any corrupt activities. Also, don't offer money or anything valuable to influence decisions in favor of Onto Innovation.

We follow strict laws against bribery, kickbacks, and other corrupt activities. No Onto Innovation colleague should offer or accept bribes or improper benefits to gain business or an unfair advantage. This includes offering or accepting anything of value, like cash, gifts, meals, or favors, to influence decisions. Laws like the U.S. Foreign Corrupt Practices Act prohibit giving anything of value to foreign officials to benefit our business. Offering gifts or favors to U.S. government employees is also against the rules and can be a criminal offense. Many of our customers have their own anti-bribery policies. We must avoid any form of bribery, extortion, embezzlement, or kickbacks in all our dealings. Even if kickbacks are not illegal in some places, they are strictly prohibited by Onto Innovation.

Violating these rules can lead to severe penalties and harm Onto Innovation's reputation.



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## COMPLIANCE AND REPORTING PROCEDURES

To protect Onto Innovation and its colleagues, it's important to report any known or suspected violations of our Code or any laws or Company policies. This applies whether you're directly involved or not. Reporting isn't disloyal—it's required and helps to safeguard our integrity.

### STEPS TO FOLLOW

- **Gather All Facts:** Ensure you have all the information to make an informed decision.
- **Evaluate the Situation:** Ask yourself if what you're being asked to do seems unethical or improper. Trust your judgment.
- **Discuss with Your Supervisor:** When in doubt, talk to your supervisor or manager, if appropriate. They can provide guidance and help solve problems.
- **Seek Additional Help:** If discussing with your supervisor isn't an option or you are not comfortable doing so, reach out to Human Resources or senior management.
- **Report Improper Behavior:** Follow the reporting procedures for any unethical or improper behavior.

### HOW TO REPORT

- **Immediate Supervisor:** Start by reporting to your supervisor or their manager.
- **Other Contacts:** If you're uncomfortable with that, contact Human Resources, the General Counsel's office, or senior management.
- **Confidential Hotline:** Call 1-888-262-6937, a confidential, global, toll-free number.
- **Written Reports:** Send concerns to The Office of General Counsel, Onto Innovation Inc., 16 Jonspin Road, Wilmington, MA 01887.
- **Email:** Email [codeofethics@ontoinnovation.com](mailto:codeofethics@ontoinnovation.com) (note that email anonymity can't be guaranteed).
- **Navex EthicsPoint Portal:** File a report online at Navex EthicsPoint: [ontoinnovation.ethicspoint.com](https://ontoinnovation.ethicspoint.com).
- **Board Members:** Write to The Office of the Corporate Secretary, Onto Innovation Inc., 16 Jonspin Road, Wilmington, MA 01887.

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### DETAILS TO INCLUDE

- Names of people involved
- Witnesses (if any)
- Dates, times, and places
- Events that took place
- Why you think it's a violation

**Confidentiality and Cooperation:** Reports will be kept confidential as much as possible. You must keep information about ongoing investigations confidential and cooperate fully.

**No Retaliation:** You can report in confidence without fear of retaliation. Retaliation against anyone making a good faith report is prohibited and will result in disciplinary action.

### FEDERAL PROTECTION

Federal law (41 U.S.C. 4712 and 10 U.S.C. 4701) provides whistleblower rights and protection for civilian employees working on a Federal Government contract, subcontract, or grant. Specifically, contractors and subcontractors are prohibited from (a) discharging, (b) demoting, or (c) discriminating against employees who report what they reasonably believe is misconduct related to a Federal contract or grant. Disclosure of misconduct could involve, but not be limited to, any of the following:

- Gross mismanagement of a Federal contract or grant;
- A gross waste of Federal funds;
- An abuse of authority relating to a Federal contract or grant;

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- A substantial and specific danger to public health or safety; or
- A violation of law, rule, or regulation related to a Federal contract or grant (including the competition for or negotiation of a contract or grant).
- A court or grand jury.
- A management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct.

The prohibition against retaliation applies when suspected mismanagement is disclosed to the following persons and/or entities:

- A Member of Congress or a representative of a committee of Congress.
- An Inspector General.
- The Government Accountability Office.
- A Federal employee responsible for contract or grant oversight or management at the relevant agency.
- An authorized official of the Department of Justice or other law enforcement agency.

41 U.S.C. 4712 establishes a process for review of whistleblower reprisal complaints alleged by employees of contractors, subcontractors, and grantees when an employee believes he/she has been subjected to a prohibited reprisal. Complaints may be submitted to the Inspector General of the executive agency involved, and most agency Offices of Inspector General will have anonymous reporting hotlines or whistleblower webpages.

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## INVESTIGATIONS AND DISCIPLINARY ACTION

**Investigations:** The Board of Directors handles matters involving Board members or executive officers, while the Chief Financial Officer, General Counsel, and Human Resources manage issues involving other employees or agents. If these issues affect Onto Innovation's reputation or financial performance, the Board will be notified. These parties may delegate investigations and recommend disciplinary actions. The Chief Financial Officer and General Counsel will report violations and corrective actions to the Board, which can also conduct investigations and determine disciplinary actions.

Violations will be promptly investigated, and individuals will be notified and given the opportunity to respond to allegations. Suspension with or without pay may occur during investigations. Onto Innovation will take corrective action for any violations.

**Disciplinary Action:** Violations of this Code are taken seriously. Disciplinary actions may include reprimand, suspension, termination, or other appropriate measures, and records of disciplinary actions may be kept in personnel files. In determining the appropriate disciplinary action, Onto Innovation will consider the nature and severity of the violation, history of warnings and violations, whether the violation was intentional or inadvertent, and whether the violator self-reported the misconduct. Onto Innovation aims to enforce this Code consistently while considering all relevant information. However, Onto Innovation reserves the sole and absolute discretion to determine appropriate disciplinary action for any violation of this Code. Violations may also be reported to authorities and could lead to civil or criminal prosecution.

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## WAIVERS OF THE CODE OF BUSINESS CONDUCT/ETHICS

A waiver of any part of this Code for a member of Onto Innovation's Board of Directors, the principal executive officer, principal financial officer, principal accounting officer, other employees with similar roles, or other executive officers must be approved in writing by the Board. This approval must be promptly disclosed as required by law. For any other colleagues, a waiver must be approved in writing by the Company's General Counsel or Chief Financial Officer.

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## CLOSING WORDS

Thank you for taking the time to understand our Code of Business Conduct and Ethics. Your commitment to these principles is what makes Onto Innovation a place where integrity, respect, and excellence thrive. Together, we can continue to build a workplace that we are proud of, where every action reflects our shared values. Let's move forward with confidence, knowing that our dedication to ethical conduct sets us apart and drives our success.

