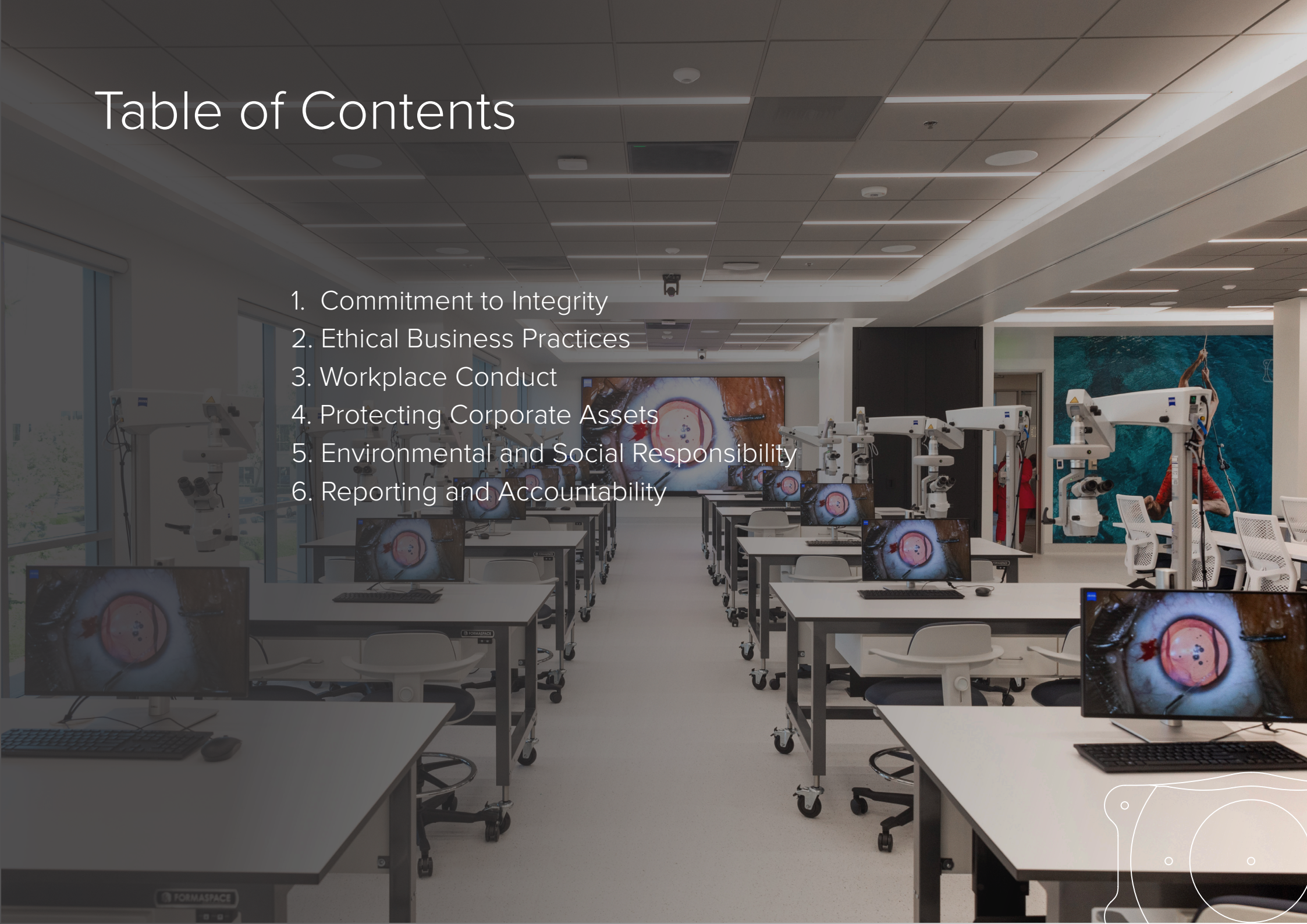




Code of Business Conduct and Ethics

Table of Contents

1. Commitment to Integrity
2. Ethical Business Practices
3. Workplace Conduct
4. Protecting Corporate Assets
5. Environmental and Social Responsibility
6. Reporting and Accountability



Commitment to Integrity

STAAR Surgical Company designs, develops, manufactures, and sells implantable lenses for the eye and accessory delivery systems used to deliver the lenses into the eye. We are the leading manufacturer of phakic implantable lenses used worldwide in corrective or “refractive” surgery. We have been dedicated solely to ophthalmic surgery for over 40 years.

This Code of Business Conduct and Ethics (the “Code”) reflects the commitment of STAAR Surgical and its global subsidiaries and affiliates (“STAAR” or “Company”) to pursue our mission with integrity and in compliance with applicable laws and regulations. It applies to all STAAR directors, officers and employees worldwide (collectively, “personnel”). It also applies to third parties, such as contractors, consultants, and suppliers acting on STAAR’s behalf. Everyone conducting business on behalf of STAAR is expected to understand and adhere to this Code.

As a global medical technology company, we comply with applicable laws, regulations, and standards of each country in which we operate. This operating environment can be very complex as regulations can differ from country to country. Although the Code cannot and does not explicitly cover all possible situations personnel may face, it does provide general guidance for making ethical decisions intended to uphold our reputation as a trusted organization. By following its principles, company policies, procedures and guidelines, and with guidance from STAAR’s Legal team, you can stay aligned with global requirements while still focusing on patients, customers and product quality. To further your understanding, we have also included examples of ways to identify and avoid unethical or illegal conduct.

You should know the Code’s contents and consult it whenever you are unsure of what actions to take in a given situation. This Code establishes the overall framework for our Compliance Program, which STAAR supplements with targeted policies, procedures and guidelines intended to set specific expectations of behavior in key areas of operational risk. If you are unsure whether an action is consistent with the law, a regulation, or a policy, seek guidance from your supervisor, the Compliance Officer, or a member of Human Resources (HR) or Legal.

STAAR’S GLOBAL COMMITMENT

Every day our personnel around the globe work to deliver upon our promise to be the first choice for surgeons and patients seeking visual freedom. This Code evidences a shared commitment to our stakeholders that we will uphold the highest ethical principles in conducting our business activities and deliver on our goals without losing sight of our underlying values. Ethics are not negotiable. We make this commitment because we understand that our collective long-term success depends on us making the right choices for our customers, their patients, and all the stakeholders whom we serve every day- in big decisions, and small.



Nathaniel Sisitsky

Chief Legal Officer and
Corporate Secretary

A Message from our Chief Legal Officer

At STAAR, ethical business practices and compliance have been a Company commitment for over 40 years. It has guided our decisions, strengthened our reputation, and built trust with patients, customers, and investors worldwide.

We believe that success is not just about what we accomplish, but how we accomplish it. Upholding ethical principles in our daily interactions fosters long-term relationships and contributes to a culture of compliance. At STAAR, we take pride in doing business the right way, knowing that our actions reflect not only ourselves, but our reputation as a Company.

Our stakeholders rely on us to operate with transparency, honesty and accountability. Their trust is important to us, and we protect it by upholding high standards in everything we do. By adhering to this Code, we demonstrate our commitment to integrity, ethical business practices, respect in the workplace, and corporate responsibility.

This Code serves as a guide for making ethical decisions in our daily work. It outlines our policies on various subject matters related to Company operations. All STAAR personnel are expected to understand and follow this Code, contributing to a culture of integrity. When in doubt, the Code provides directions on how to seek guidance and navigate ethical challenges.

If you have questions about this Code or encounter behavior that raises concerns, we encourage you to speak up. You can report issues to your manager, the Legal Department (legal@staar.com) or a member of the Compliance team (complianceofficer@staar.com), or through our Compliance Hotline at <https://staar.ethicspoint.com>. Retaliation for good-faith reporting is strictly prohibited. Your voice matters in upholding our ethical standards.

At STAAR, integrity is not optional, it's essential. Thank you for your commitment to doing business ethically and responsibly.

Sincerely,

Nathaniel Sisitsky

Chief Legal Officer and Corporate Secretary



Core Values

The Code is a guide to transforming our core values into consistent actions worldwide. It is the backbone for our Compliance Program, which defines our commitment to managing risk areas, driving adherence to global standards, and promoting accountability. At STAAR, we operate with integrity, which means that everyone does the right thing, even when no one is watching.

Building on this foundation of integrity, this Code is intended to promote:

- Compliance with all applicable laws, rules and regulations
- Personal accountability for adherence to this Code
- Honest, transparent, and ethical conduct, including the ethical handling of conflicts of interest and in all interactions with patients, health care professionals (HCPs), customers, colleagues and third parties (including government employees)
- Full, fair, accurate, timely, and clear disclosure in reports and documents filed with the U.S. Securities and Exchange Commission (SEC) and other government agencies
- Protection of Company assets and confidential information (including personal data)
- Prompt internal reporting to the Compliance Officer of potential violations of this Code (or applicable laws)

Managers have an added responsibility to live our core values and provide guidance to their teams by:

- educating on the expectations of this Code as applied to their job responsibilities;
- encouraging a commitment to our Compliance Program by understanding their roles in the detection, prevention and correction of unethical conduct by, for example, completing their compliance training;
- driving strict compliance with our non-retaliation policy for all team members who raise concerns or participate in investigations; and
- encouraging their team members to speak up and report compliance related concerns.

Accountability and Speaking Up

Accountability is an important part of our culture. We must hold ourselves and each other accountable to operating with the highest levels of integrity - and we must do what we say we are going to do. Everyone at STAAR is expected to speak up if they are concerned that something is inconsistent with our core values, an action doesn't seem right or compliant or if they are unsure how to do the right thing in a particular situation.

Personnel, officers, and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against any personnel because they make a report in good faith or cooperate with investigations of potential violations of this Code. All credible claims made in good faith will be investigated and appropriate actions will be taken.

Where to Go for More Guidance

If you become aware of, or have reason to believe there has been a violation of any law, rule or Company policy, whether by STAAR personnel or third-parties, you are expected to promptly report the matter to your supervisor, a member of the Legal Department (legal@staar.com), a member of the Compliance team (complianceofficer@staar.com), or, if it relates to privacy regulations, the Data Protection Officer (privacyoffice@staar.com), or, if it relates to an employee matter, your HR representative. Alternatively, you can submit reports using the Compliance Hotline (1-800-299-6012) or Website (<https://staar.ethicspoint.com>). For employees located outside of the U.S., telephone numbers for the Compliance Hotline may be found at <https://staar.ethicspoint.com>. The Compliance Hotline and Website are operated by an independent third party, and cases may be submitted on a named or (if allowed in your country) anonymous basis.



Ethical Business Practices

Anti-Bribery and Anti-Corruption
Gifts, Entertainment, and Hospitality
Ethical interactions with Health Care Professionals
Ethical interactions with Government Officials
Responsible Marketing, Advertising and Sales
Trade Laws

Free and Fair Competition
Conflicts of Interest
Related Person Transactions
Insider Trading
Accuracy of Records and Disclosures

Anti-Bribery and Anti-Corruption

At STAAR, we are committed to conducting business in alignment with global and local anti-corruption standards, laws and industry guidelines. This includes the U.S. Foreign Corruption Practices Act (“FCPA”) and U.K. Bribery Act. Personnel and third parties interacting with government officials and agencies or health care providers and organizations on our behalf, or who prepare STAAR books and records (“Foreign Agents”), are prohibited from offering, giving, requesting, or accepting an improper inducement or misrepresenting any financial transaction in conducting our business. This includes a payment or benefit that is intended to improperly influence - or even that appears to unduly influence – anyone, or to gain any unfair business advantage. Remember that a bribe is not limited to the exchange of money but could also include the promise or giving of a gift, entertainment, travel, or a favor. If a government official or customer requests or demands any such benefit, report this immediately to Legal or Compliance. See **STAAR’s Global Anti-Bribery and Anti-Corruption Policy** and **Ethical Marketing and Interactions with Health Care Providers Guidelines** for more information.

Why Anti-Bribery and Anti-Corruption Matter:

- **Legal Compliance:** Bribery and corruption are illegal and can result in severe penalties including fines, imprisonment, and reputational damage.
- **Reputation and Trust:** A strong approach to bribery and corruption enhances STAAR’s reputation with customers, suppliers, investors, and other stakeholders.
- **Fair Competition:** Anti-bribery practices provide a level playing field for all businesses, promoting fair competition and ethical business practices.
- **Ethical Responsibility:** Upholding strong ethical standards has a positive impact on our communities and improves employee morale.

Key Principles:

- STAAR prohibits all forms of bribery, including giving, soliciting, or accepting bribes or kickbacks intended to improperly influence the recipient for the benefit of our business.
- This prohibition applies to interactions with government officials, customers, suppliers, and any other third parties (including in some cases commercial bribery).
- All financial arrangements, expenses and payments made by STAAR or on STAAR’s behalf must be recorded in a transparent and accurate manner, without exception.
- In many countries, health care providers fall within the scope of foreign officials, and local industry standards regarding ethical interactions should be followed.
- Facilitation payments (small payments made to expedite routine government actions) are strictly prohibited, even if they are customary in some regions.

Gifts, Entertainment, and Hospitality

At STAAR, the giving or receiving of gifts, hospitality, and entertainment must always be appropriate, proportionate, and consistent with applicable laws and Company policies. Gifts and hospitality should never influence business decisions or create a conflict of interest. Additional rules and regulations also apply to any gifts and entertainment provided to HCPs. See **STAAR's Ethical Marketing and Interactions with Health Care Providers Guidelines** for more information.

The giving and receiving of gifts create a potential conflict of interest because it may influence or appear to influence business decisions. We want our business decisions to be based on the Company's best interest, not on the value of a gift, and we must avoid even the appearance of impropriety.

- Giving anything of value to a customer or supplier to obtain or retain business raises serious legal concerns and is prohibited. Remember, in most countries, physician customers are considered foreign government officials, and as such gifts may be construed as a violation of anti-corruption regulations (such as the FCPA).
- Accepting gifts from suppliers or potential suppliers is generally discouraged. Employees should never accept lavish or expensive gifts, cash, gift cards.

Key Principles:

Gifts and Hospitality:

- Gifts and hospitality must be reasonable, proportionate, and consistent with customary business practices.
- They must never be offered or accepted with the intent to influence business decisions or gain an unfair advantage. You should never accept a gift from a vendor during contracting and renewal negotiations.
- There are special industry rules and national laws limiting gifts to government officials and HCPs in most countries.

Transparency and Approval:

- All gifts, hospitality, and entertainment must be transparent and properly documented. Cash payments, cash equivalents (e.g., gift cards) or payment for third-party events not involving STAAR education or legitimate business meetings (e.g., to discuss consulting work or clinical study) are strictly forbidden.
- Obtain prior approval from the Legal Department (legal@staar.com) or a member of the Compliance team (complianceofficer@staar.com) for any gifts, hospitality, donations, or entertainment for customers, prospective customers, or government employees (directly or through a Foreign Agent).

Charitable Donations:

- Charitable contributions and sponsorships must be made for legitimate purposes and not to conceal improper payments.
- Obtain prior approval from Finance and Legal or Compliance for any charitable contributions or sponsorships.

Ethical Interactions with Health Care Professionals

STAAR is committed to building trust-based relationships with HCPs by providing safe, high-quality, and effective products while adhering to the highest ethical standards. Our interactions with HCPs must always be transparent, honest, and compliant with applicable laws and regulations, including those related to the promotion of medical devices. For more information, see **STAAR's Ethical Marketing and Interactions with Health Care Providers Guidelines**.

Why Interactions with HCPs Matter:

- **Patients Come First:** STAAR personnel must avoid creating any conflicts that could interfere with HCPs' independent decisions on clinical care, including what they believe is best for each patient.
- **Regulatory Compliance:** Local and global laws and regulations are intended to enforce ethical interactions with HCPs, and violations can result in legal penalties for STAAR personnel and HCPs.
- **Reputation and Trust:** Ethical practices build trust and strengthen our reputation built on excellent products and service, not improper arrangements.



Key Principles:

Respect the Physician-Patient Relationship:

- Many countries have specific regulations for how medical device companies interact with HCPs. A core element of anti-kickback and anti-corruption regulations is to protect patients from undisclosed and unethical relationships between HCPs and industry professionals that create a conflict of interest (i.e., patients come first).
- “Doing the right thing” should always include considering the best interests of patients.

Compliance:

- Local and global anti-kickback and anti-corruption regulations look to the local industry guidelines on interactions with HCPs to define what is reasonable (and so should you).
- Some country regulations set defined limits on gifts, meal caps, financial arrangements, and HCP consultant honoraria - know the rules where you operate (contact legal@staar.com for help).

Respect for Customer Policies:

- Respect the policies and procedures of HCP employers and institutions, including limits on receiving honoraria from industry (which may be stricter than industry guidelines).

Confidentiality:

- Protect the confidential information of HCPs and their patients and use it only for legitimate business purposes.
- Do not disclose customer or patient information to unauthorized individuals or third parties.

Ethical Interactions with Government Officials

We are committed to conducting interactions with government officials with the highest standards of integrity and compliance. Special rules apply when dealing with government entities and employees, and we must confirm that our interactions are transparent, ethical, and compliant with all applicable laws and regulations. See **STAAR's Global Anti-Bribery and Anti-Corruption Policy** for more information.

We may not promise, offer, pay, ask for or accept anything of value with the intent to obtain or maintain business, or any unfair competitive advantage, or to improperly influence government decisions. We are expected to demonstrate high integrity in all of our business interactions.

Relations with government agencies must be managed only by STAAR personnel authorized for this purpose. All information provided to government officials must be complete, accurate and up-to-date and interactions always conducted ethically, transparently and in compliance with this Code, STAAR's Global Anti-Bribery and Anti-Corruption Policy and other compliance policies, and applicable global and national regulations.

If you are not certain whether an activity you are coordinating may involve a foreign government official or if special requirements apply, contact Legal or Compliance.

Why Interactions with Government Officials Matter:

- **Legal Compliance:** Interactions with government officials are subject to strict laws, such as the FCPA, the U.K. Bribery Act, and other national anti-corruption regulations.
- **Avoiding Penalties:** Violations of applicable laws can result in severe penalties, including fines, imprisonment, and the loss of current or future government contracts.

Key Principles:

- Never seek or accept confidential bid information or government sensitive information related to a competitor.
- Never offer or provide payment, gifts, gratuities, or entertainment to any government official or employee without prior written approval by Legal or the Compliance Officer. Remember that in many countries, our HCP customers are employed by state-owned hospitals or have roles in the national health service and may be considered government officials.
- When doing business with government customers, be familiar with the contract you are working under, conform strictly to their supplier requirements and know your government customer's specific rules and regulations.
- Provide truthful, accurate, and complete information in all invoices, representations, and certifications with government (and all) customers.

Responsible Marketing, Advertising and Sales

STAAR has dedicated a cross-functional team and significant resources to oversee truthful, ethical, and responsible marketing and sales practices. Our products are designed to improve lives, and it is essential that we communicate their benefits and risks accurately and transparently. Misleading or deceptive marketing not only violates the law but also undermines the trust of our customers, patients, and stakeholders. See **STAAR's Global Ethical Marketing and Interactions with HCPs** and **Global Promotional Guidelines** for more information.

Why Responsible Marketing Matters:

- **Patient Safety:** Accurate information about our products is critical to patient safety, satisfaction and positive treatment outcomes.
- **Regulatory Compliance:** As a medical device company, STAAR is subject to strict regulations from agencies such as the U.S. Food and Drug Administration (FDA), European Medicines Agency (EMA), and other global regulatory bodies.
- **Reputation and Trust:** Ethical marketing practices help build and maintain the trust of HCPs, patients, and the broader community.



Key Principles:

Accurate Information:

- All marketing and advertising materials must be truthful, accurate, and non-misleading, and clearly disclose any risks, side effects, or limitations associated with our products.
- Avoid making exaggerated claims or omitting essential information that could influence a customer or patient decision. For example, be transparent if any influencer, patient or HCP providing a testimonial received benefits from STAAR (such as free lenses).

Compliance with Regulatory Requirements:

- Marketing statements about product performance, safety, and efficacy must be supported by scientific evidence and approved by the Medical, Legal and Regulatory review committee (MLR) for compliance with applicable regulations.
- Do not engage in off-label promotion or make claims about unapproved uses of our products. Any questions about off-label use of our products must be directed to Medical Affairs.
- Follow local regulations on consumer marketing of medical devices, using testimonials, making statements about competitors, and regulator pre-approval and marking.
- Global marketing regulations vary greatly by country, and in many countries consumer direct marketing is prohibited. Marketing personnel must educate themselves and seek advice to stay compliant in their respective regions.

Trade Laws

Many countries in which we operate have laws controlling the import and export of technology, personal information, medical devices and other goods. Governments also periodically impose trade restrictions or sanctions on certain countries, entities, and individuals.

Why Trade Laws Matter:

- **Legal Compliance:** Compliance with export, import and sanctions laws and boycotts are a legal requirement and helps avoid fines, penalties, and legal action.
- **Operational Efficiency:** Proper compliance drives efficient international transactions and minimizes the risk of delays, seizures, or penalties that could negatively impact the business.

Key Principles:

Export Controls:

- Determine whether an export license is required for each transaction based on the product, destination, and end-user.
- Apply for and obtain the necessary export licenses or authorizations before shipping controlled items.

Import Controls:

- Take steps to confirm that all imported goods follow the customs regulations of the destination country.
- Provide accurate and complete documentation for customs clearance, including invoices, packing lists, and certificates of origin.

Technology and Information Transfers:

- Control the transfer of technology and information, including technical data and software, to help compliance with export control laws.
- Use appropriate safeguards, such as encryption and access controls, to protect sensitive technology and information during transfers.

Sanctions:

- Confirm that you are aware of the applicable sanctions against countries, entities and individuals before doing business in any region. Ask Legal for help.
- Regularly check distributors, suppliers and transactions against sanctions lists. Ask Compliance for help.

Free and Fair Competition

Antitrust regulations help support free and open competition that is essential to innovation, customer choice, and the overall health of the economy. We aim to comply with all applicable antitrust and competition laws to align our business practices with promoting a competitive marketplace.

Why Free and Fair Competition Matters:

- **Innovation:** Free and fair competition drives innovation by encouraging companies to develop better products and services.
- **Customer Choice:** A competitive marketplace gives customers and patients access to a wide range of products at fair prices.
- **Legal Compliance:** Compliance with antitrust laws is a legal requirement and helps STAAR avoid fines, penalties, and legal action.

Key Principles:

Prohibition of Anti-Competitive Practices:

- STAAR prohibits all forms of anti-competitive behavior, including price-fixing, market allocation, and bid-rigging.
- Do not engage in any agreements or practices with other companies that affect prices, terms or conditions of sale, or fair competition.
- Do not discuss with competitors product pricing, markets and development, marketing and sales plans, or key costs such as research and development or labor costs.

Fair Pricing:

- Set prices independently and based on market conditions, costs, and competitive factors.
- Do not coordinate pricing with competitors or engage in predatory practices.

Conflicts of Interest

Personnel should avoid any actual or apparent conflicts of interest. Identifying, disclosing, and managing conflicts of interest is essential to preserving trust, transparency, and accountability.

What is a Conflict of Interest?

A conflict of interest arises when an employee's personal interests—financial, familial, or otherwise—could influence, or appear to influence, their professional judgment or actions at STAAR.

Examples include:

- **Financial Interests:** Owning a significant stake in a competitor, customer, or supplier.
- **Outside Employment:** Working for or consulting with another company that competes with or does business with STAAR or distracts from employee's ability to dedicate their full attention to their job at STAAR.
- **Family Relationships:** Having a close family member who works for a competitor, customer, supplier, or employee's team or related team at STAAR.
- **Gifts and Entertainment:** Accepting gifts or entertainment that could influence business decisions, such as accepting an offer from a prospective vendor that seems too good to be true (e.g., tickets to a game, expenses covered for a "product training" in a nice location).

Avoid situations where your personal interests could unduly influence your professional judgment or decisions. If a conflict arises, be transparent with your manager and remove yourself from all related decisions.

Why Avoiding Conflicts of Interest Matter:

- **Integrity:** Conflicts of interest can undermine trust in STAAR's decision-making processes.
- **Reputation:** Even the appearance of a conflict could damage STAAR's reputation and relationships with stakeholders.
- **Legal Compliance:** Failure to disclose and manage conflicts of interest can result in legal and regulatory penalties.

Key Principles:

Avoidance of Conflicts of Interest:

- Personnel must avoid situations where their personal interests could conflict with STAAR's interests.
- When in doubt, disclose the potential conflict to your supervisor or Legal and await a decision before taking the next step.

Disclosure of Existing Conflicts:

- Personnel must promptly disclose any actual or potential conflicts of interest to their supervisor, their HR representative or Legal.
- Disclosures should include all relevant details, such as the nature of the conflict and any parties involved.

Management of Conflicts:

- Once disclosed, conflicts of interest will be reviewed by the appropriate personnel, and a decision will be made about how to manage or resolve the conflict.
- In some cases, employees may be required to divest financial interests, recuse themselves from certain decisions, or take other steps to mitigate the conflict.

Related Person Transactions

As a public company, STAAR is subject to stringent requirements concerning related person transactions. The SEC defines these as any transaction, arrangement, or relationship in which a company or its subsidiaries is a participant, and the amount involved exceeds \$120,000 USD, and where a related person (director, executive officer, immediate family member, or beneficial owner of more than 5% of the company's stock) has a direct or indirect material interest. Such transactions can take many forms, including loans, leases of property or equipment, service agreements, sales and purchases of goods, guarantees, etc. See **STAAR's Related Person Transaction Policy** for more information.

Why Transparency for Related Person Transactions Matters:

- **Integrity:** Related person transactions can have implications for transparency, integrity and overall financial controls.
- **Conflict of Interest:** When transactions occur between parties with pre-existing relationships, there is a risk that they may not be conducted at arm's length, to the potential disadvantage of shareholders.
- **Compliance:** The SEC mandates detailed disclosure of related person transactions and failure to do so can result in penalties, legal repercussions, and reputational harm.

Key Principles:

Reporting of Related Person Transactions

- Any arrangement that could be a related person transaction must be reported in advance to Legal for review and approval.
- When in doubt, consult with Legal and wait for clear instructions on if and when the transaction may proceed.

Insider Trading

Insider trading is not only illegal but also undermines the trust of our shareholders, employees, and the broader financial markets. All personnel are prohibited from purchasing, selling, or making other transfers of STAAR securities on the basis of "material nonpublic" information (MNPI) or tipping MNPI. MNPI is any information that a reasonable investor would consider important in deciding whether to buy, sell or hold a security. Examples of MNPI include unreleased quarterly earnings results, pending regulatory approvals, or significant business developments. To protect STAAR and STAAR personnel from insider trading violations, or allegations of such violations, and to protect the company's reputation, STAAR has established processes and protocols that personnel must follow whenever they or family members engage in transactions involving STAAR securities. See **STAAR's Insider Trading Policy** for more information. If you are unsure whether information is MNPI or you have other questions about insider trading, consult Legal before acting.

Key Principles:

Prohibition of Insider Trading:

- STAAR personnel are prohibited from trading STAAR securities or the securities of other companies (e.g., customers, suppliers, or competitors) while in possession of MNPI.
- This prohibition applies to both buying and selling securities.

Prohibition of Tipping:

- Do not share MNPI with others who might trade securities based on that information. This is known as "tipping" and is illegal for both the person sharing inside information and recipient who then trades on the MNPI.

Accuracy of Records and Disclosures

STAAR is committed to maintaining accurate, complete, and transparent disclosures in all aspects of our business. Accurate record-keeping is essential for regulatory compliance, financial integrity, and maintaining the trust of our stakeholders, including patients, customers, regulators, and shareholders. In addition, full, fair, accurate, timely, and clear disclosure is required in all filings with the SEC and other government agencies.

Key Principles:

Honest and Accurate Disclosures:

- Various regulators, including the SEC, require that companies maintain true, accurate, and current records of all business transactions, financial records, and operational data.
- Never make false or misleading entries in Company records, including financial statements, expense reports, or regulatory submissions.

Compliance with Accounting Standards:

- STAAR's financial records must conform to Generally Accepted Accounting Principles (GAAP) and other applicable accounting standards.
- Significant financial transactions must be supported by appropriate evidence.

Compliance with the FCPA:

- The FCPA requires that U.S. public companies maintain accurate books and records and have a system of internal controls sufficient to provide reasonable assurances that transactions are executed, and assets are accessed and accounted for in accordance with management's authorization.

- All transactions with customers, government officials (or related parties) and Foreign Agents must be accurately described in purchase orders, contracts, and other documents. When in doubt, contact Legal.

Transparency in Regulatory Submissions:

- All data submitted to the SEC and other regulatory agencies, including in SEC filings, clinical trial results, product safety data, and manufacturing records, must be truthful, accurate and complete.
- Never alter, falsify, or omit data in reports or submissions to regulators.

Proper Documentation:

- Maintain thorough and organized documentation for all business activities, including contracts, expenses, invoices, and correspondence.
- Confirm that all records are stored securely and retained for the required period in accordance with **STAAR's Records Management Policy**.

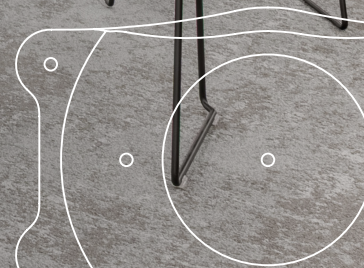
No Undisclosed or Unrecorded Accounts:

- Do not establish or maintain any undisclosed or unrecorded accounts or funds for any purpose.
- All financial transactions must be recorded in STAAR's official accounting system.



Workplace Conduct

Health and Safety
Non-Discrimination
Harassment-free Workplace
Alcohol and Drugs
Firearms and Weapons
Safe Driving Practices

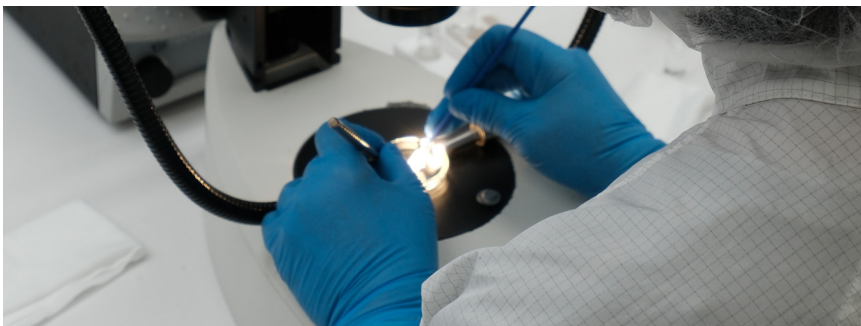


Health and Safety

At STAAR, the health and safety of our employees and customers are of the utmost importance. We strive to provide a safe and healthy work environment by providing regular employee training and conducting our operations in compliance with applicable health and safety laws and regulations.

Why Health and Safety Matters:

- **Employee Well-being:** A safety-conscious workplace protects employees from injuries and illnesses, improving their sense of well-being.
- **Regulatory Compliance:** Compliance with health and safety laws is a legal requirement and helps STAAR avoid fines, penalties, and litigation.
- **Reputation and Trust:** A strong record of safety performance enhances our reputation and builds trust with employees, customers, patients, investors, and the community.
- **Operational Efficiency:** A safe workplace reduces production downtimes and costs associated with injuries or illnesses.



Key Principles:

Commitment to Safety:

- STAAR strives to provide a safe and healthy work environment for all employees.
- Safety is a shared responsibility, and every employee must take an active role in maintaining a safe workplace.

Following Procedures:

- All employees must complete their health and safety training within the designated time. Employees must follow all relevant Company health and safety policies and procedures, including the use of personal protective equipment (PPE) and participation in safety training.

Reporting Hazards and Incidents:

- Employees must report any unsafe conditions, near-misses, or accidents immediately.
- Prompt reporting helps prevent future incidents and allows corrective action to be taken in a timely fashion.

Emergency Preparedness:

- All employees should be familiar with emergency procedures associated with their facility of work, including evacuation routes and the locations of first aid stations.

Discrimination-Free Workplace

We are committed to fostering a workplace free of discrimination, where all employees are treated with dignity and respect. Discrimination of any kind is strictly prohibited.

Why Non-Discrimination Matters:

- **Fairness and Equality:** A workplace free of discrimination fosters equal access to employees and prospective employees to opportunities based on their skills, qualifications, and performance.
- **Reputation and Trust:** A commitment to non-discrimination enhances STAAR's reputation and builds trust with stakeholders.
- **Employee Well-Being:** A discrimination-free workplace fosters a positive working environment that improves employee productivity and morale.

Key Principles:

Prohibition of Discrimination:

- STAAR prohibits discrimination based on race, color, religion, disability, national origin, sex, age, sexual orientation, gender, marital status, protected veteran status, citizenship status or any other protected characteristic.
- This prohibition applies broadly to recruitment, hiring, promotions, benefits, training, and termination.

Equal Employment Opportunity:

- STAAR is committed to providing equal employment opportunities to all qualified employees and applicants, and employment decisions are based on merit, qualifications, and business needs.

Reasonable Accommodations:

- STAAR provides reasonable accommodation for employees with disabilities to enable them to perform their job duties.

Harassment-Free Workplace

We are also committed to providing a safe and respectful space where all employees can work without fear of harassment. Harassment of any kind is strictly prohibited. This includes, but is not limited to, sexual harassment and bullying.

Types of Harassment include:

- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- **Verbal Harassment:** Offensive jokes, slurs, epithets, or derogatory comments.
- **Physical Harassment:** Unwanted physical contact, assault, or threatening behavior.
- **Visual Harassment:** Displaying offensive images, posters, or materials.
- **Bullying:** Repeated negative, inappropriate, or unwanted conduct directed to a worker based on protected characteristics (e.g., race, disability, religion, gender identity, sexual orientation, etc.).

Employees who experience or witness harassment are encouraged to speak up or report any incidents through HR or through the Compliance Hotline or Website.

STAAR Integrity Commitment

We treat each other with dignity and respect because our people are our greatest strength. We are committed to providing a positive work environment as the foundation for high performing teams.

Alcohol and Drugs

STAAR is committed to maintaining a safe, productive, and legally compliant workplace. STAAR strictly prohibits impairment from alcohol or drugs during work-related activities and has established guidelines for responsible medication use.

- **Alcohol:** Impairment before or during work is prohibited. Alcohol at STAAR events requires prior approval from Legal and HR. Violations may result in testing (where permitted by law) and discipline, up to termination.
- **Drugs:** Illegal or mind-altering substances are banned. Employees may be subject to drug testing for employment, after accidents, or upon reasonable suspicion. Possession, use, sale, or purchase on STAAR property, vehicles, or business is prohibited. Off-duty illegal drug activity harming STAAR's reputation is also barred.
- **Medications:** Proper use under a doctor's care is allowed, but misuse is prohibited. Employees must consult a physician if medication affects job performance and inform their supervisor. Reasonable accommodations may be requested.

Firearms and Weapons

STAAR prohibits violence and weapons in all work settings to ensure employee safety. Firearms, explosives, knives, and other weapons of any kind are not permitted on Company property or while conducting Company business, unless permitted by law.

- No violence is tolerated in the workplace or work-related settings.
- Firearms and weapons are prohibited on STAAR property, in vehicles, or during business, even with a license, unless pre-approved by Legal.

Safe Driving

If you are required to operate a motor vehicle while driving on STAAR business, you must do so safely and in accordance with all applicable laws. Employees are expected to avoid distracted driving, as it has been identified as a leading cause of automobile accidents.

While driving on Company business for STAAR, personnel may not:

- conduct other activities (e.g., eating, participating in a meeting, etc.) under any circumstance that would distract you from the duty to drive in a safe and non-negligent manner;
- use a cell phone unless it allows hands-free listening and talking operations, the use is safe, and the use is permitted under local laws;
- write, send, or read text messages, instant messages, or emails while driving; or
- drive under the influence of alcohol, controlled substances, or medication that impairs driving abilities.

Like all drivers, STAAR personnel who drive on Company business have a duty to keep informed of the applicable laws and to follow them.



Protecting Corporate Assets

Protection of Confidential Information
Intellectual Property
Corporate Assets

Protection of Confidential Information

At STAAR, we recognize that confidential information is one of our most valuable assets. Protecting this information is essential to maintaining our competitive advantage, complying with legal and regulatory requirements, and safeguarding the trust of our patients, customers, and partners. See **STAAR's Confidential Information and Disclosure Policy** and **Data Privacy and Security Program** for more information.

What is Confidential Information?

- Confidential information includes any non-public information that STAAR or a third party derives value from keeping secret.
- Examples include: financial information, technical or scientific information about current and future products, business plans or projections, personnel information, and personal health information, medical records, and clinical trial data.

Key Principles:

Access Control:

- Access to confidential information should be limited to employees who need it to perform their duties and only the minimum amount necessary.
- Protect access by using strong passwords, encryptions, and other security measures.

Proper Handling:

- Handle confidential information with care. Do not discuss it in public areas or leave it unattended.
- Use secure methods to send confidential information, such as encrypted email or secure file-sharing platforms. Contact Information Security for help.

Reporting Security Incidents:

- Report any suspected unauthorized disclosures of confidentiality at once. This includes lost or stolen devices, unauthorized access, or accidental disclosures.

Non-Disclosure Agreements (NDAs):

- Before sharing confidential information with suppliers, vendors or consultants, you must confirm that an active and applicable non-disclosure and (for sharing personal data) privacy agreement is in place. Ask legal@staar.com for help.
- Do not disclose confidential information to third parties without proper authorization.

Data Retention and Disposal:

- Retain confidential information only for as long as necessary and in compliance with **STAAR's Records Management Policy**.
- Dispose of confidential information securely, using methods such as shredding or secure deletion.

Public Communications and Social Media

While we recognize that social media is a powerful tool for engaging with people internally and externally, only authorized representatives in Investor Relations, Marketing and the Executive Team can communicate on behalf of STAAR or create STAAR social media accounts. All posts referring to STAAR or STAAR products, including personal posts on social media, are subject to **STAAR's Social Media Policy** and **Confidential Information and Disclosure Policy**.

Intellectual Property

Our innovations, patents, trademarks, trade secrets, and proprietary technologies are critical to our success and competitive advantage. Protecting our intellectual property (IP) is essential to maintaining our industry leadership and establishing the continued development of life-improving products. See **STAAR's Confidential Information and Disclosure Policy** for more information.

Why Intellectual Property Matters:

- **Competitive Advantage:** Our IP gives us a competitive edge in the marketplace, allowing us to differentiate our products and services.
- **Legal Rights:** IP rights provide legal protection against unauthorized use, copying, or theft of our innovations.

Key Principles:

Protection of STAAR's IP:

- All employees must take steps to protect STAAR's IP from unauthorized use or disclosure.
- Get assistance from Legal for any contracts with vendors, contractors or consultants who may be creating IP paid for by STAAR.
- Make sure that you have an active and sufficiently broad NDA in place before sharing any STAAR IP. When in doubt, ask Legal for help.

Respect for Third-Party IP:

- Do not use, copy, or distribute the IP of others without proper authorization.
- Confirm that any third-party IP used in STAAR's products or processes is properly licensed.

Disclosure of Innovations:

- Report any innovations, inventions, or discoveries made during your employment to the appropriate department (e.g., Legal or Research and Development). STAAR retains ownership of all IP created by employees in the course of their employment or using Company resources.

Avoidance of IP Infringement:

- Do not engage in activities that could infringe on the IP rights of others.
- Seek guidance from Legal if unsure about the IP implications of a particular action.



Corporate Assets

It is also critical that we work to protect other corporate assets, such as physical property and financial resources. Protecting and using these assets responsibly is essential to maintaining our competitive edge, improving operational efficiency, and upholding our commitment to ethical business practices.

Why Corporate Assets Matter:

- **Operational Efficiency:** Proper use of assets enables efficient business operations.
- **Financial Responsibility:** Protecting financial resources contributes to STAAR's financial health.
- **Reputation and Trust:** Responsible asset management reflects our commitment to integrity and accountability, building trust with stakeholders.

Key Principles:

Protection of Assets:

- Safeguard assets from theft, loss, misuse, or damage.
- Report any suspicious activity or potential risks to the appropriate department.

Proper Use of Assets:

- Use STAAR's assets only for legitimate business purposes.
- Do not use Company resources for personal gain or unauthorized activities.

Accountability:

- Be accountable for the assets under your control.
- Confirm that all transactions involving Company assets are properly documented and authorized.



A man with dark skin and curly hair is running on a rocky, reddish-brown trail. He is wearing a yellow t-shirt, dark shorts, and a black backpack. He has a flower in his hair. The background features rugged, layered rock formations under a clear blue sky. The lighting suggests it's either early morning or late afternoon, with long shadows cast on the ground.

Environmental and Social Responsibility

Environmental Responsibility
Freedom of Association
Human Rights



Environmental Responsibility

We recognize the importance of environmental responsibility and our obligation to the communities we serve. For these reasons, we consider the environmental impacts of our operations and products, and while our primary focus remains on delivering high-quality, safe, and effective products, we also consider ways to reduce our environmental footprint where possible. For more information, please see **STAAR's Environmental Policy**.

Why Environmental Responsibility Matters:

- **Regulatory Compliance:** Compliance with environmental laws and regulations is a legal requirement and helps the Company avoid fines, penalties, and other legal actions.
- **Reputation and Trust:** A commitment to sustainability enhances STAAR's reputation and builds trust with customers, employees, and the communities in which we operate.
- **Operational Efficiency:** Sustainable practices in our operations, as well as in our production processes, can reduce waste, lower costs, and improve efficiency.





Freedom of Association Policy

We respect employees' rights to join or form associations, including labor unions, without fear of retaliation. Employees are free to express their views and engage in lawful activities related to collective bargaining.

Human Rights

We believe in the fundamental dignity of every human being. We are committed to respecting human rights as recognized by the principles of the United Nations Global Compact and related declarations and the core labor standards set out by the International Labor Organization. We condemn the use of forced labor, modern slavery or trafficking, and exploitative child labor. We encourage the same core values from our global suppliers. See **STAAR's Human and Workforce Rights Policy** for more information.

Reporting and Accountability

Reporting Violations and the Compliance Hotline
Investigation and Disciplinary Action
Ethics for Senior Financial Officers
Administration and Interpretation



Reporting Violations and the Compliance Hotline

Our Compliance Hotline and Website are essential resources designated to provide employees, contractors, suppliers, and any other stakeholders with a confidential and secure means to report any suspected or observed misconduct, including violations of this Code, regulatory requirements, or Company policies.

Who Can Report:

Any employee, contractor, vendor, or other personnel or stakeholder associated with STAAR is encouraged to use the Compliance Hotline.

How to Report:

The Compliance Hotline may be reached any time by telephone toll-free in the United States at 1-800-299-6012. For those located outside of the U.S., local telephone numbers for the Compliance Hotline may be found <https://staar.ethicspoint.com>.

You can submit a secure electronic report via the Compliance Website: <https://staar.ethicspoint.com>. You will be assigned a unique code ("report key") that allows you to log back into the system to check your report for feedback or questions, which you are encouraged to do.

If you prefer to contact the Compliance Hotline in writing, the address is:

STAAR Surgical Company
Attn: Compliance Officer
25510 Commercentre Drive
Lake Forest, CA 92630
Email: complianceofficer@staar.com

Confidentiality and Anonymity:

- **Confidential Process:** All reports will be treated with confidentiality to the extent possible while allowing investigation of the matter. Information is shared on a need-to-know basis during the investigation process.
- **Anonymous Reporting:** Where allowed by law, individuals may choose to remain anonymous. While anonymous reports may limit our ability to follow up for additional details (unless you follow up on your report via the report key), every effort will be made to investigate all credible concerns.

No Retaliation:

- **Protection Against Retaliation:** STAAR strictly prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation. Any form of retaliation will be subject to disciplinary action, up to and including termination.
- **Support for Whistleblowers:** If you experience any forms of retaliation, please report it immediately through the Hotline or the Compliance Officer (complianceofficer@staar.com).

Investigation and Disciplinary Action

- STAAR takes seriously reports of misconduct or violation of any law, rule, or regulation. Upon receiving a report, the Compliance team, alongside Legal, will promptly assess claims and, if necessary, initiate an investigation.
- All credible concerns and complaints about accounting or auditing matters will be forwarded to the Audit Committee of the Board for evaluation and further action.

Code of Ethics for Senior Financial Officers

In addition to being bound by all other provisions of this Code, our CEO, CFO, and Corporate Controller and other senior financial officers performing similar functions who have been identified by the CEO (collectively, our Senior Financial Officers) are subject to additional standards and requirements, as set forth below.

Senior Financial Officers shall:

- Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Produce, or cause to be produced, full, fair, accurate, timely, and understandable disclosure in reports and documents that STAAR files with, or submits to, the SEC and in other public communications made by STAAR;
- Promote compliance with applicable governmental laws, rules and regulations;
- Promptly report violations of this Code of Ethics to the Chief Legal Officer or the Audit Committee, as appropriate; and
- Be held accountable for adherence to this Code of Ethics.

This Code, as applied to our Senior Financial Officers, shall be our “code of ethics” within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

The Board shall determine appropriate actions to be taken in the event of violations of this Code by our Senior Financial Officers. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code, and may include censure by the Board, demotion, re-assignment, suspension, up to and including termination of employment of any individual involved.

Administration and Interpretation

Waivers and Exceptions:

While some of the provisions contained in this Code must be strictly adhered to and no exceptions can be allowed, in certain cases exceptions may be possible.

If you believe that an exception is appropriate and in STAAR’s best interest, then you should first contact your supervisor. If your supervisor agrees that an exception is appropriate, the approval of STAAR’s Compliance Officer must be obtained.

Any officer or director who seeks an exception should contact STAAR’s Chief Legal Officer. Waivers of this Code for officers or directors or changes to this Code that apply to officers or directors may be subject to approval by the Board of Directors and will be disclosed as required by law or regulation.

Interpretation and Guidance:

Given the complexity of this Code, it is understandable that you may have questions regarding interpretation and application of the Code. It is the Company’s intention that all personnel comply with both the letter and spirit of the law. If you have questions, you are encouraged to talk to your supervisor or consult with STAAR’s Legal or Compliance team, as appropriate.

Updates and Amendments:

The Company may update or amend this Code at any time.

Effective Date:

The Board has approved this Code effective as of June 18, 2025.