

HUMAN AND WORKFORCE RIGHTS POLICY

STAAR Surgical Corporation (“STAAR”) is committed to upholding human and workplace rights throughout our company. STAAR respects internationally recognized human rights principles, including [The International Labour Organization’s \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).

The Policy applies to all employees of STAAR, including part-time and temporary workers and independent contractors. Our commitment to respect human rights also extends to individuals throughout our value chain. We use our relationships with our suppliers and other business partners to promote the principles of this policy throughout our network.

We will not tolerate human rights abuses, human trafficking and/or slavery and will not engage or be complicit in any activity that solicits or encourages human rights abuse. We expect our suppliers, vendors and business partners to comply with all applicable laws and regulations, including internationally-recognized human rights standards.

STAAR has adopted a Supplier Code of Conduct. While we recognize that each supplier will have varying policies and approaches to human rights, we expect our suppliers to respect the human rights of the people with whom, and the communities in which, they do business. This includes, among other things, acting in a manner consistent with recognized human rights ideals, respect for the environment and ethical business practices.

This Human and Workforce Rights Policy sets forth key principles that guide us in operating our business in order to achieve this goal.

Respecting the Rights of Workers

Commitment to Prohibit Modern Slavery: STAAR prohibits all forms of modern slavery in our own operations and supply chain, including the following:

- The use of enslaved, involuntary, forced, prison, or debt bondage labor;
- Involvement in human trafficking or any activity that promotes modern slavery;
- The use of any corporal punishment, physical or psychological abuse, or threats of violence or coercion;
- Payment of recruitment agency fees by the worker;
- Withholding of any original copies of employee identification documents; or
- Unreasonable restrictions on the ability of the worker to leave the workplace and find alternative employment.
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Commitment to Prohibit Child Labor: STAAR prohibits child labor, as defined by the [International Labour Organization \(ILO\)](#) in our own operations and supply chain. Our commitment to prohibit child labor includes hazardous child labor as defined by [Article 3 of the ILO’s Worst Forms of Child Labour Convention](#).

Commitment to Prohibit Discrimination: STAAR is committed to prohibiting discrimination with respect to employment and occupation. We have adopted an Affirmative Action and Equal Opportunity Policy Statement (the “EEO Policy”) that affirms that we are an equal opportunity employer. As stated in the EEO Policy:

- STAAR recruits, hires, trains, promotes, compensates and takes all other employment actions without regard to gender identity, race, color, religion, national origin, ancestry, age, sexual orientation, marital or family

status, disability, or veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations;

- In order to achieve our commitment to appropriate gender and minority representation within the workforce, we participate in targeted recruitment of minority, women, veteran, and disabled jobseekers to enhance representation in the applicant pool for all levels of the workforce; and
- In order to confirm our commitment to internal pay equity, STAAR conducts an annual pay equity analysis, and regularly evaluates pay practices in connection with new hires and promotions.

We will not engage or be complicit in any activity that solicits or encourages the violation of women's rights or the rights of members of underrepresented communities.

Commitment to Rights at Work: STAAR is committed to respecting the principles set out in the [ILO Declaration of Fundamental Principles and Rights at Work](#), including the rights to freedom of association, collective bargaining, fair compensation, and safe and healthy working conditions.

STAAR recognizes its responsibility to maintain a workplace that is free from violence, harassment, intimidation or other unsafe or disruptive conditions. We are committed to ensuring that we provide a safe and healthy workplace to all employees. .

[Committing to Stakeholder Engagement, Grievance, and Remedy](#)

Stakeholder Engagement: STAAR is committed to engaging with affected stakeholders and/or with their legitimate representatives in the development and monitoring of our human rights approach.

Grievance Mechanisms: STAAR is committed to providing accessible grievance mechanisms, which includes a mechanism for employees to submit their grievances anonymously and demonstrate that these are investigated and reviewed. STAAR does not retaliate nor permit retaliation against anyone who raises questions or concerns about corporate activities, and we are committed to investigating these issues and providing appropriate responses and remedies.

Remedy: STAAR is committed to providing for or cooperating in remediation for affected individuals through legitimate processes where it has been identified that STAAR has caused or contributed to adverse impacts. STAAR will not obstruct access to other remedies.

Respecting the Rights of Human Rights Defenders: STAAR is committed to respecting the rights of human rights defenders, as defined by the [UN Declaration on Human Rights Defenders](#), in their work to peacefully promote and protect human rights. We do not tolerate nor contribute to threats, intimidation, and attacks (both physical and legal) against human rights defenders.

[Implementation](#)

Governance and Accountability: This policy has been approved by STAAR's Board of Directors. The STAAR Executive Management Team holds itself accountable for the company's policies, procedures, social and environmental responsibility programs and performance.

Training and Dissemination: Training is an important part of effective human rights and sustainability practices. We regularly provide employee training regarding the ethical conduct we expect. Non-compliance with this Policy is subject to escalation, investigation, and remediation in accordance with our internal policies.

To report a suspected or actual violation of any company policy, including this Human and Workforce Rights Policy please contact our Compliance Officer (complianceofficer@staar.com; 626.303.7902, x2231) or our Ethics Hotline (telephone toll-free in the United States at 1- 800-299-6012).