

## Supplier Code of Conduct

STAAR Surgical Company is committed to reaching its goals in an ethical and principled manner. We hold our standards high and expect the same degree of integrity and strong values from our suppliers. The requirements are based on internationally recognized standards, including the [International Labour Organisation \(ILO\) Declaration on Fundamental Rights and Principles at Work](#).

This Supplier Code of Conduct is an extension of our standard terms and conditions of purchase (which requires suppliers to comply with applicable laws) and we are mindful of it when determining who we wish to partner with for business. The term “Supplier” or “Suppliers” means any person or entity that is the source for goods or services. The Supplier Code of Conduct (or “Code”) is applicable to all workers and employees of any of those suppliers (including permanent, temporary, contract agency and migrant workers). This includes all those providing work at a supplier location, such as under an employment agency or service provider. It also applies to any subcontractors and third-party labor agencies. We expect our direct Suppliers to support our commitment to full compliance with this Code via the development and implementation of a similar policy and risk-based due diligence process over their own supply chains.

Our expectations for suppliers include the following:

### Business Ethics

Your company must not condone, support, or engage in any form of bribery, illegal payments, nor the offer of gifts or entertainment used to obtain an improper advantage with government officials or business partners. You must support and comply with applicable U.S. and international laws related to the elimination of corruption and bribery. Any potential conflict of interest should be disclosed to STAAR immediately when and if any are identified. You should protect your customer’s intellectual property and data and any personal information you collect, obtain, process or store, and comply with applicable laws related to such.

### Human Rights

**Commitment to Prohibit Modern Slavery:** You should prohibit all forms of modern slavery in your 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.

**Commitment to Prohibit Child Labor:** You should prohibit child labor, as defined by the [International Labour Organization \(ILO\)](#) in your own operations and supply chain. Your 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:** You should be committed to prohibiting discrimination with respect to employment and occupation.

**Commitment to Rights at Work:** You should be 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. You should recognize your responsibility to maintain a workplace that is free from violence, harassment, intimidation or other unsafe or disruptive conditions.

**Health and Safety:** Suppliers should provide a safe and healthy working environment. Suppliers should comply with all applicable health and safety laws and regulations.

**Workplace Facilities – Sanitation:** Supplier workplace facilities should be clean and hygienic, and meet the basic needs of workers.

## Environment

We expect you to strive to minimize your impact on the environment and natural resources while protecting the health and safety of your employees and the public.

**Engaging Stakeholders:** Suppliers should participate in dialogue, if reasonably requested, with affected stakeholders and/or their legitimate representatives to inform their practices around human rights and respect for the environment.

**Environmental Authorizations:** Suppliers should comply with all applicable environmental regulations. All required environmental permits, licenses and registrations should be obtained and followed.

**Waste and Emissions:** Suppliers should have systems in place to ensure the safe handling and management of waste, emissions and wastewater discharges. Any waste or emissions with the potential to adversely impact human or environmental health should be appropriately managed prior to release into the environment.

**Spills and Releases:** Supplier should have systems in place to prevent and mitigate accidental spills and releases to the environment.

**Environmental Efficiency:** Suppliers should take measures to conserve energy, reduce water consumption where appropriate, and report Level 1 and 2 greenhouse gas emissions on a periodic basis.

**Hazardous Substances:** Chemicals, waste, and other materials posing a hazard to humans or the environment should be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

**Environmental Impacts:** Suppliers should have an effective environmental policy and comply with existing legislation and regulations regarding the protection of the environment. Suppliers should operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where practical and to engage in activities to promote reuse and recycle programs.

## Data Privacy

Suppliers should operate in a manner that complies with applicable data privacy and data security laws, directives, and regulations, including personal information collected or otherwise processed by Supplier on STAAR's behalf. Personal information means any information that identifies, or could be used to identify an individual and includes, without limitation, names, address, email addresses, and telephone numbers.

## GRIEVANCE AND REMEDY

**Grievance Mechanisms:** Suppliers should have systems in place for workers to submit their grievances anonymously and demonstrate that these are investigated and reviewed. Suppliers should enable accessible, grievance mechanisms and follow-up without fear of reprisal.

**Commitment to Remedy:** Suppliers should provide for or cooperate in remediation for affected individuals, through legitimate processes where it has been identified that they have caused or contributed to adverse impacts. Suppliers should not obstruct access to other remedies.

**Prohibiting Grievance Retaliation:** Suppliers should not retaliate against anyone who raises questions or concerns about corporate activities. Suppliers should protect whistle-blower confidentiality and prohibit retaliation against workers who report workplace grievances.

### Implementation

STAAR is engaged in the production of medical devices that can have significant impact on the quality of life of those that benefit from our technology and products. Our suppliers must have a quality system that support the items supplied to us.

**Management Systems:** Suppliers should develop and enforce policies and procedures to ensure compliance with all aspects of this Code. This includes ensuring accurate record-keeping to demonstrate compliance.

**Traceability:** Suppliers should be able to disclose the country of origin for the primary materials for all deliveries made. We reserve the right to ask suppliers for a full supply chain map in order to facilitate risk assessment and gauge compliance in the upstream supply chain. Suppliers should be transparent about all known facilities used to produce products or services for us and provide such information upon request.

**Training:** Suppliers should inform workers about the expectations contained in this Code. Relevant employees should be trained on the topics of business ethics, human rights, workplace health and safety, quality, and environmental protection.

**Audits and Corrective Action Process:** It is our goal to build relationships with suppliers who follow our Code of Conduct. We expect our Suppliers to cooperate with our reasonable requests for information, certifications, and/or audits. When there is a concern, our practice is to work with the supplier. When an issue can't be corrected or a supplier partner is unwilling to engage, we reserve the right to end our relationship. In cases where improvement is required, we will support the supplier to establish clear milestones and processes to support their achievement.

**Continuous Improvement:** STAAR expects suppliers to strive to exceed both international and industry best practices. We recognize that achieving the requirements of this Code is a dynamic process and encourage continuous improvement.

**Engaging your supply chain:** We expect our Suppliers to support our commitment to compliance with this Code via the development and implementation of a similar policy, where practical.