2025 Sustainability Report

STAARSURGICAL™

About This Report

In this report, we use the terms “we,” “us,” “STAAR”, “STAAR Surgical” or “the company” to refer to STAAR Surgical Company. This report provides data and highlights primarily covering STAAR’s fiscal year 2024, including progress on sustainability projects through March 2025. This report is informed by the reporting guidelines set forth by the Sustainability Accounting Standards Board (SASB) Medical Equipment and Supplies industry standard and the Task Force on Climate-related Financial Disclosures (TCFD).

This report includes data from STAAR Surgical Company’s North American facilities, and where indicated, STAAR Surgical Company’s Swiss and Japanese subsidiaries. All reported data are best estimates. This report also includes our SASB Index located in the Appendix, a voluntary public disclosure providing transparent, relevant corporate responsibility information to investors and other key stakeholders.

Throughout this report, we refer to our facilities by the municipalities where they are located.

Overview of global operations and key facilities

Country	Locations	Facilities
United States	Monrovia, CA	Global administrative offices, principal manufacturing, warehouse, distribution
	Lake Forest, CA	Corporate headquarters, executive offices, EVO Experience Center, additional operational facilities
	Aliso Viejo, CA	Raw material manufacturing
	Tustin, CA	Technology center, R&D team and labs
Switzerland (Wholly owned subsidiary STAAR Surgical AG)	Brügg	Administrative, distribution, operational
	Nidau	Manufacturing
Japan (Wholly owned subsidiary STAAR Surgical KK Inc)	Tokyo	Administrative
	Osaka	Administrative
	Musashino City	Distribution
China, Germany, Spain, India, Singapore, U.K.		Commercial offices

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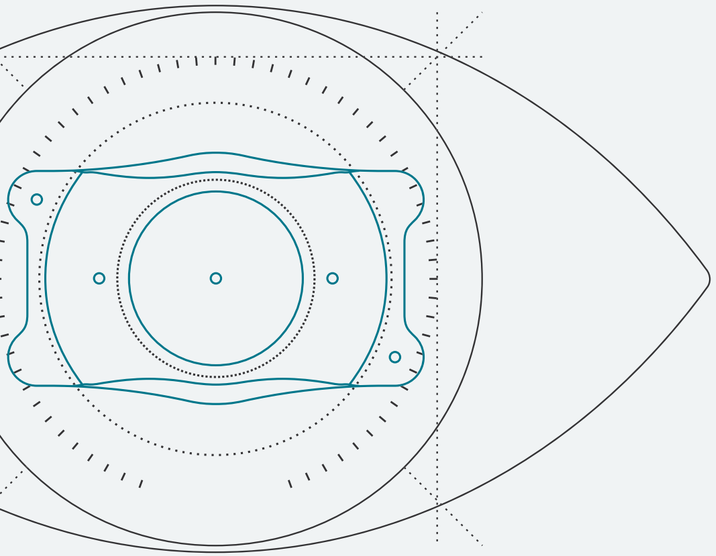


About STAAR Surgical Company

STAAR Surgical Company (STAAR) 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.

Our Implantable Collamer® Lenses (ICLs) are intended to provide visual freedom for patients, lessening or eliminating the reliance on glasses or contact lenses. We market and sell our ICLs for refractive surgery to treat myopia (nearsightedness) as our “EVO” family of lenses. We believe our EVO™ lenses are an “Evolution in Visual Freedom®” designed to provide premium refractive outcomes while optimizing patient comfort.

More than 3,000,000 ICLs have been sold to date and STAAR markets these lenses in over 75 countries.

For more information, visit www.staar.com and www.EVOICL.com.

2024 Highlights

Environment

10%
Reduction in greenhouse gas (GHG) intensity

>5%
Reduction in freshwater usage for manufacturing

Social

41%
Improvement in workplace safety total recordable incident rate (TRIR)

92%
Talent retention rate

Governance

Separated the roles of Chief Executive Officer and Board Chair to strengthen governance

Revised corporate governance guidelines and Board Committee charters to align with best practices

A Message from our Chief Executive Officer

It is with great pride and a deep sense of responsibility that I present the STAAR Surgical Company 2025 Sustainability Report. As the newly appointed Chief Executive Officer, I am honored to join STAAR during this critical time. I firmly believe that the building blocks for our success are in place, and I am eager to work with our stakeholders around the world as we continue to deliver upon our vision to be the first choice for surgeons and patients seeking visual freedom.

At STAAR, we are committed to operating in an ethical and sustainable manner, with a focus on our investors, business partners, employees, customers, and the communities and patients they serve.

In this report, we highlight our approach to corporate responsibility and business ethics, our focus on the environment and sustainability, our standards for product quality and safety, as well as efficient supply chain management. We also recognize the importance of our 1,000+ dedicated employees to our success, and this report provides an overview of how we attract, engage and retain our talent, as well as our efforts to invest in our people and give back to our communities.

During 2024, STAAR invested in systems and tools to enhance our operations and business resiliency, and we will be focused on opportunities for improvement, optimization, and efficiency. In 2025, we expect to complete the rollout of our enterprise resource planning upgrade and to commence manufacturing at our Switzerland facility. These represent significant milestones in strengthening our global operations and building a sustainable foundation for future growth.

We also continued to invest in surgeon education and training to bring our Implantable Collamer® Lenses (ICLs) to more patients around the globe. In September 2024, we opened an advanced and expanded EVO Experience Center at our Lake Forest, CA, headquarters to provide comprehensive, hands-on training and education in lens-based corrective vision. This facility underscores our commitment to empowering eye care professionals with the knowledge and skills needed to deliver exceptional patient outcomes, shaping the future of surgeon confidence in STAAR ICLs.

In addition, by investing in our workforce, creating a safe and caring environment for our employees, and offering opportunities for continued learning and development, we are engaging and retaining our talent significantly above industry average. Our talent retention rate of over 92% is a point of pride for me and STAAR. And I am pleased to share that in our November 2024 Voice of Employee survey, 83% of respondents indicated they would willingly recommend STAAR to a friend or relative as a great place to work.

The efforts outlined in this Sustainability Report not only enable us to adapt to changing market conditions but allow us to bolster our organizational effectiveness in the face of a rapidly changing world and climate, helping to drive long-term value for shareholders.

I offer my sincere thanks to our business partners, employees and stakeholders for your continued support and dedication.

Sincerely,

Stephen C. Farrell
Chief Executive Officer

Corporate Responsibility

As STAAR is a company dedicated to improving lives through innovative medical technology, we are deeply focused on preserving trust through effective stewardship.

Our robust governance framework underpins a culture committed to upholding high standards of integrity and accountability in line with compliance requirements and the interests of our stakeholders.

Board Composition and Structure

Our Board of Directors (the Board) is charged with oversight of the company in furtherance of the long-term best interests of our shareholders.

As of March 2025, the Board was comprised of six Directors, five of whom are independent under NASDAQ rules. We rely on our talented and experienced Board to provide leadership, guidance and oversight. Our Directors have a strong background in executive leadership and management, international business, and healthcare and industry knowledge. We believe that the diversity of their backgrounds and experience makes our Board more effective in carrying out its duties.

In furtherance of good governance, we have focused on Board refreshment and have added three new Directors to our Board since December 2023. Each of these new Directors is independent and brings significant experience in China, the world's largest market for refractive vision procedures and STAAR's largest market. Two of these Directors have extensive healthcare industry experience, and one brings corporate finance, capital markets and investment management experience.

This reporting year, we made changes to our Board leadership structure. In February 2025, we appointed Stephen C. Farrell as our new Chief Executive Officer to succeed Thomas G. Frinzi. Mr. Farrell joined our Board in 2016 and had served as our Lead Independent Director since December 2023. In connection with Mr. Farrell's appointment as Chief Executive Officer, our Board determined to separate the roles of Chief Executive Officer and Board Chair to establish clearer leadership roles and strengthen Board independence. Elizabeth Yeu, M.D., a respected ophthalmic surgeon who has served as an independent Director since 2021, was elected to serve as Board Chair.

The Board is assisted in its oversight duties by its three standing committees: the Audit Committee, the Compensation Committee, and the Nominating and Governance Committee. Each of the Board standing committees is comprised solely of independent Directors. This reporting year, we revised and updated the charters of the Board standing committees for consistency, improved clarity, and to better align with governance best practices. In addition, the Board adopted new Corporate Governance Guidelines to promote the functioning of the Board in furtherance of its fiduciary duties and to serve the interests of the Company and its shareholders. The guidelines reflect the Board's commitment to building long-term shareholder value with an emphasis on corporate governance. See our Investor Relations webpage or most recent Proxy Statement for more details.

ESG Governance

As part of its responsibilities, the Board oversees the assessment of our major business risks and the measures we take to identify, mitigate, and manage our risk profile. The Board has delegated oversight of environmental and sustainability policies to the Nominating and Governance Committee. Management provides regular reports to the Nominating and Governance Committee on our environmental, social, and governance (ESG) strategy and initiatives.

At the management level, we made significant strides in formalizing our program in 2024. We hired our first-ever full-time employee focused on ESG data management and analysis, reporting, and compliance. We believe this will improve cross-functional coordination and data collection and disclosure processes, as well as support our compliance with evolving regulations. In addition, we approved a new charter for our cross-functional committees and working groups and appointed a new executive sponsor to help guide and champion these efforts. These cross-functional teams are responsible for developing and executing our ESG strategy and approach.

Committee/Group	Responsibilities	Meets	Reports to
ESG Committee	Oversees development and execution of ESG strategy and initiatives, including data gathering, risk assessment, objectives, and disclosures	At least twice annually	Executive leadership, with periodic updates as necessary and periodically to the Board
ESG Working Group	Supports ESG Committee by monitoring and improving ESG data collection and compliance with regulations; oversees preparation and submission of annual disclosures	At least quarterly	ESG Committee
Diversity, Equity, and Inclusion Committee	Promotes globally inclusive culture; educates employees on DEI topics; highlights international observances and holidays	At least quarterly	ESG Committee
Climate Risk Working Group	Reviews and monitors strategy to identify material climate-related risks and impacts; implements programs to mitigate and disclose them	At least annually	ESG Committee

Business Ethics

Our leadership sets the tone for the high standards of responsible business conduct that define our organization. The Board, with the assistance of its three standing committees, approves policies that support business ethics. Our Code of Business Conduct and Ethics (Code of Conduct) is a key policy that guides our Directors, officers, and employees worldwide in making ethical decisions and complying with applicable laws and regulations when conducting business.

Consistent with our recent efforts to revise and update the charters of the Board standing committees and our Corporate Governance guidelines, we are in the process of updating the Code of Conduct for consistency, improved clarity and to better align with best practices. To supplement the Code of Conduct, we have adopted a number of standalone policies. This reporting year, we updated our Insider Trading Policy, which implements processes and procedures designed to prevent insider trading violations, and we adopted a new Confidential Information and Disclosure Policy, which establishes guidelines regarding the protection of confidential information and addresses how and when confidential information may be shared or disclosed. During 2025, we intend to adopt new standalone policies on non-discrimination, avoiding bribery and corruption, responsible marketing, and environmental responsibility.

At STAAR, all new hires are required to complete comprehensive training on our Code of Conduct and certify that they will abide by it. We also require our contractors, as appropriate, to train on and certify to the Code of Conduct. In addition, employees are required to recertify their adherence and complete refresher training on key topics annually. Separate annual training has also been provided on insider trading and protecting confidential information. In 2024, over 99% of employees completed the mandatory training.

Anti-Bribery and Anti-Corruption

We have a zero-tolerance policy for bribery and corruption, which is covered in mandatory Code of Conduct training for employees. In addition, employees who interact with global healthcare professionals or government officials are required to complete additional annual training on topics covered in our standalone Anti-Corruption Policy.

We track and audit expenses related to interactions with healthcare professionals to monitor compliance with modest meal limits and require that events are focused on education. Further, we review customer-related spending in the purchase order (PO) process.

STAAR also conducts due diligence on all new distributors to confirm they have ethics codes in place and no history of bribery or improper interactions with customers or government officials. Distributors must certify compliance with STAAR's Code of Conduct, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act as part of their initial contract with STAAR and must recertify compliance annually. New vendors who have financial relationships with physicians or interact with the government on STAAR's behalf (foreign agents) are also required to pass due diligence checks and/or complete certifications. We periodically monitor global sources for adverse media involving our distributors or foreign agents, particularly those in higher risk countries.

Ethical Marketing

As set out in our Code of Conduct, we prohibit STAAR employees from making untrue, misleading, deceptive, or fraudulent statements regarding our products and services, or from taking unfair advantage of anyone.

We have established a medical, legal and regulatory review process for advertising and promotional materials, as well as for clincal publications and presentations, to validate that all statements are consistent with our regulatory approvals and that descriptions of features, benefits, data, and analysis regarding our products are accurate and not misleading. Our cross-functional teams use a comprehensive content lifecycle management platform to centralize their review, and in 2024, we improved our processes and issued guidelines on marketing regulations in key jurisdictions where we operate.

In addition, we take steps to prohibit the improper promotion of "off-label" use of STAAR products in accordance with the U.S. Food, Drug, and Cosmetic Act and relevant laws. In 2024, to better share clinical information with surgeons, we launched STAAR University, which offers surgeons access to publications, key clinical outcomes data, and other resources to support clinical confidence.

We provide educational events for our customers in a responsible manner aligned with industry guidelines. This includes monitoring the effectiveness of controls set forth in our Global Ethical Marketing and Interactions with Health Care Professionals program and providing regional training sessions to our marketing teams. We investigate credible reports of violations of our ethical marketing standards and take corrective actions where necessary.

Whistleblower Policy

We maintain a Compliance Hotline and Website, which allow employees, suppliers, customers, and third parties anywhere in the world to raise concerns about potentially unethical conduct they observe. The independent service is available 24/7 in local languages and is proactively communicated on www.staar.com and intranet as well as in our Code of Conduct. Reports are treated confidentially and can be made anonymously, where permitted by local law. They are timely investigated, and appropriate actions are taken to address any substantiated claims. As set forth in our Code of Conduct, we prohibit discrimination or retaliation against any employee who reports a violation or concern in good faith or participates in an investigation.

Cybersecurity and Data Privacy

Safeguarding the privacy and security of data pertaining to our stakeholders is of critical importance to STAAR.

Our Chief Information Officer leads a dedicated committee that includes the Director of Information Security, Director of IT Operations and Chief Privacy Officer, to identify, manage, and mitigate risks associated with cybersecurity and data privacy. Cybersecurity and privacy are discussed by the Board at least annually, with additional meetings if specific issues arise.

We have adopted the National Institute of Standards and Technology Cybersecurity Framework (NIST CSF) to align our cybersecurity program with industry standards.

Employees are required to complete mandatory training on cybersecurity and privacy best practices at least annually, and we conduct regular phishing simulation tests to heighten employee vigilance and response.

Zero
Data security breaches in 2024

In 2024, we made several improvements to bolster our cybersecurity defenses and improve privacy compliance requirements:

- Updated our Data Privacy and Security Policy and added a Privacy Operations Manual to address evolving privacy and security needs
- Formalized our data governance and data classification processes, enhancing our ability to manage and protect sensitive data
- Increased training on targeted privacy regulations for personnel handling personal data from the U.S., California, EU/UK/CH, Japan and China
- Expanded automation of monitoring systems and brought in external parties to help monitor risks, breaches, and gaps in data security
- Formalized a privacy impact assessment procedure mandating that any new programs collecting personal data be assessed for compliance with applicable privacy regulations
- Self-certified to the US-EU-UK-Swiss Data Privacy Framework
- Conducted a cybersecurity risk assessment and tabletop exercise and used findings to update our Incident Response Plan
- Implemented Privileged Access Management to monitor use of personal and confidential data

Environment

At STAAR, we understand the need to balance our strategies to serve our customers and their communities with consideration for the long-term health of the planet.

We seek to contribute to a sustainable future by using energy and water responsibly, minimizing waste, and transitioning to lower-carbon operations, while bolstering our climate resilience. In 2025, we intend to formalize this commitment through the adoption of a dedicated Environmental Policy. We aim to make our practices more environmentally sustainable while taking steps to safeguard our business against risks associated with climate change.

Further, we believe that because our ICLs provide long-term vision correction benefits, they can reduce the environmental impact associated with disposable contact lenses.

Climate and Energy

Improving energy efficiency and transitioning to renewable energy are the main ways we seek to reduce our carbon footprint, a strategy that also makes sound business sense.

Over the last three years, we have invested in solar panel installations at our Southern California facilities in Tustin, Lake Forest, and Monrovia. In 2024, these installations met approximately 30% of our energy needs at the three sites by generating 1,019 MWh of electricity. In 2024, we installed a battery storage system and back-up generator at our Monrovia manufacturing facility to support energy reliability during peak demand times and allow us to store excess solar power for later use.

Additionally, we embarked on a on-going program to upgrade our single-phase HVAC systems to three-phase systems, in line with California's Title 24 building energy efficiency standards.

To support our employees using electric vehicles and reduce emissions associated with commuting, in 2024, we installed electric vehicle charging stations at our new corporate headquarters. We offer them free of charge for employee use as part of our efforts to encourage low-emission transportation to work.

Operational Greenhouse Gas Emissions

We follow the World Resources Institute's Greenhouse Gas Protocol to calculate our operational (Scope 1 and 2) greenhouse gas (GHG) emissions. As our business continues to grow, we use GHG intensity as our key metric to monitor performance, based on the ratio of energy usage per $1,000 USD of revenue.

This year, we expanded our Scope 1 and 2 emissions calculations to encompass our international facilities and commercial offices where we have operational control. This broader reporting boundary brings seven offices and three storage facilities into scope, allowing for a more comprehensive and transparent assessment of our emissions profile.

We are pleased to share a year-over-year GHG intensity reduction of 10% and overall reduction of more than 12%, even as we expanded the boundary of our emissions profile. By lowering our carbon footprint while enhancing transparency, we are making meaningful steps in advancing our ESG program.

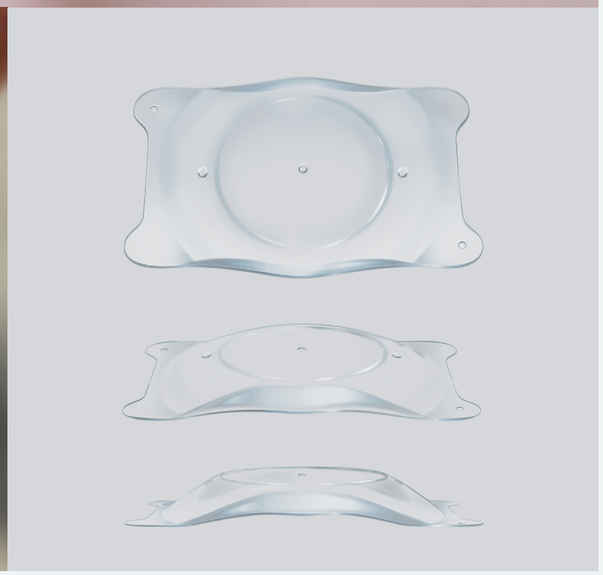
Climate-related Risks and Opportunities

Our Climate Risk Working Group is responsible for identifying, assessing, and addressing climate change risks and opportunities and reporting periodically to executive leadership.

The location of our core operations in Southern California puts us at physical risk of drought conditions and potential wildfires, which will continue to be exacerbated by climate change. These vulnerabilities are coupled with the seismic risks posed by earthquakes in California and Japan where we have facilities.

To mitigate these risks, we have made significant investments to establish a second manufacturing site at our Nidau facility in Switzerland. We have also increased our inventory of finished lenses at different sites around the world and have boosted inventory levels of our proprietary Collamer® material used in our ICLs. These efforts not only strengthen our resilience against climate-related risk but also support our ability to address market growth and demand.

Lastly, we are aware of the risk of potentially higher compliance costs posed by new climate regulations. We will continue to monitor these changes closely and adapt our strategies as needed.



Waste Management

Responsibly managing waste associated with our products and operations makes sense financially, and it benefits the environment.

Hazardous Waste

We monitor our hazardous waste and use certified vendors to transport it for treatment, storage, and disposal. We also conduct regular testing of wastewater to support adherence to relevant regulations.

We had zero occurrences of hazardous waste and environmental non-compliance in 2024. Our total hazardous waste generated increased by approximately 6% compared with 2023. This was due in part to an increase in production for our inventory levels. In 2023 , we implemented a program that enables us to clean waste glassware from industrial processes, so that it can be recycled rather than entering our hazardous waste stream.

Electronic Waste

In accordance with the applicable regulations, our information technology department works to manage our electronic waste and coordinates with our vendors for proper management, disposal, and recycling, when possible.

Paper Waste

We are working to reduce our paper usage across our organization. At our Monrovia, CA manufacturing facility, we initiated a pilot program in 2024 for a new electronic work order kiosk, which would allow the transition from paper to digital work orders. To reduce the use of paper in quality documentation, we also continued to use electronic Directions for Use (eDFU) in markets where this is allowed.

At the end of 2024, we began implementing a new electronic quality management system, which will reduce our paper usage.

Water Management

Most of our water usage is related to our manufacturing process, and we recognize the importance of managing this precious resource responsibly.

Our Monrovia, CA manufacturing facility is in an area of high-water stress. In 2024, we integrated water purity and boiler metrics into the building management system, giving us greater visibility and control over our water usage. In addition, we installed motion-sensor faucets and low flow technology in bathrooms to improve water efficiency. In part due to these efforts, our freshwater usage across our Monrovia and Aliso Viejo manufacturing sites decreased by more than 5% compared to the previous year.

Product Quality and Safety

Patients around the world have trusted STAAR's ICLs to bring them visual freedom. We work hard to sustain their trust by prioritizing safety and quality, adhering to global regulatory standards, and continuously improving our quality management and business systems.

Our Quality Manual details how we manage quality and safety across the product lifecycle, from design and materials sourcing to manufacturing, packaging, distribution, and post-market surveillance. It incorporates our Quality Policy, which is dedicated to meeting customer requirements for positive patient outcomes.

Design and Development

We align our practices to international product quality and safety standards for medical devices, including the following standards set by the International Standards Organization (ISO):

- ISO 11979 series for intraocular lenses
- ISO 10993 standard for biocompatibility materials handling and processing
- ISO 11607 and ISO 17665 standards for packaging and sterilization
- ISO 13485 standard on quality management systems for medical devices
- ISO 14971 standard on risk management for medical devices

We continuously put our products, and the materials and components used in them, through testing on biocompatibility, sterility, and endotoxins. Additionally, we conduct ongoing process validation and cleanroom assessments.

Quality Management System

Our processes are maintained and improved through our quality management system (QMS) which is compliant with ISO 13485 standards. The QMS is essential for regulatory compliance under the U.S. FDA Quality System Regulations and has undergone rigorous audits and certifications by our EU Notified Body and other regulatory authorities.

At the end of 2024, we began implementing a new electronic QMS to enhance data integrity and compliance. Replacing paper and PDF formats, the cloud-based centralized platform is expected to streamline workflows for document control, complaint handling, audits, non-conformance reports, and corrective and preventive actions (CAPA).

Quality risks or impacts raised through our QMS processes are escalated to our Quality Management Oversight Committee, a cross-functional leadership group headed by the Head of Regulatory Affairs that meets as required to align on appropriate action.

Training for Employees, Suppliers, and Surgeons

New employees undergo training on our Quality Manual and any standard operating procedures assigned to them, with periodic refreshers thereafter. Any revisions to the Quality Manual automatically trigger mandatory training.

In addition, our employees are required to complete annual training on the core elements of our QMS and standalone training on complaint handling, as any employee made aware of an alleged product deficiency is required to report it within 24 hours.

Relevant suppliers, including those that calibrate our equipment, must complete training provided by STAAR on the standard operating procedures that apply to them.

Our surgeon customers are also required to complete our EVO ICL certification training and demonstrate sufficient product knowledge and proficiency in performing surgical procedures with our lenses. The structured program includes both didactic sessions and hands-on simulated surgical practice, followed by successfully conducting multiple surgical cases at the surgeons' facilities in the presence of a STAAR clinical representative or designated surgical proctor.

Our Chief Medical Officer, an ophthalmic surgeon with extensive experience conducting EVO ICL procedures in his practice, travels globally to conduct "train the trainer" sessions and oversee training standards. In 2024, more than 1,200 healthcare professionals received EVO ICL training and certification globally. In September 2024, STAAR opened an advanced and expanded EVO Experience Center at our Lake Forest, CA, headquarters to meet growing demand from surgeons. The Experience Center is a global hub for comprehensive, hands-on training and education in lens-based vision correction. STAAR offers a comprehensive range of professional education programs to support ophthalmic professionals including wet labs, peer mentorship, and proctorship.

Quality System and Safety Audits

Our manufacturing facilities undergo regular audits by our internal Quality team and third parties. Our EU Notified Body conducts external assessments for compliance with ISO 13485, and the globally recognized Medical Device Single Audit Program (MDSAP) endorsed by Australia, Brazil, Canada, Japan, the United States, and other health authorities.

In 2024, a successful third-party audit was carried out across our five facilities in the United States and Switzerland to recertify us for three years to ISO 13485 standards and MDSAP, as well as renew our adherence to the EU Medical Device Regulation (MDR). During the year, we also underwent an unannounced third-party audit of our Monrovia, CA facility and a manufacturing facility audit of our Nidau, Switzerland facility, both with successful outcomes.

Zero
Product recalls in 2024

Continuous Improvement

Consistent with best practices, we conduct ongoing monitoring of our products' safety and performance, striving for continuous improvement.

Our complaint handling and post-market surveillance procedures are intended to promptly identify issues that may arise. We then follow a rigorous CAPA process to determine the root causes of any defects and develop improvement plans designed to prevent recurrence.

In compliance with the MDR, we make product data, including adverse events, complaints, corrective actions, and clinical evaluation results publicly available through our annual Periodic Safety Update Report submission to our EU Notified Body.

Our Device Safety Committee, which includes representatives from our Quality and Medical Affairs teams, meets quarterly to review our product performance and identify trends, so that they remain within acceptable risk profile limits. It reports results during quarterly Quality Management Review meetings comprised of cross-functional executives, including the Chief Executive Officer and Chief Operating Officer.

Supply Chain Management

Our foremost commitment at STAAR is to consistently provide our customers with safe, compliant, and effective medical devices that enhance patient health outcomes. This means we expect the same exceptional standards of integrity and transparency from our suppliers as we demand of ourselves.

We adopt a risk-based approach to approving and monitoring suppliers to safeguard quality and traceability in line with applicable laws and regulations, as well as to mitigate supply chain disruptions.

We sell a Class III medical device; as such, we require certain suppliers to maintain their own QMS and comply with international regulations and standards, including ISO 13485.

Where a supplied material or product is of critical importance, we also analyze potential suppliers' management of their own Tier 1 suppliers as part of our evaluation process.

Supplier Code of Conduct

When selecting suppliers, we assess their alignment with our Supplier Code of Conduct. This outlines our expectations on topics such as anti-bribery and corruption, human rights (including the prohibition of child labor and other forms of modern slavery), safe and healthy working environments, provision of grievance mechanisms, environmental stewardship, data protection, and legal compliance.

Suppliers of materials, products or services directly related to our products are covered by our QMS and are therefore mandated to endorse the Supplier Code of Conduct before approval and agree to audits according to their risk profile.

Supplier Audits

We assign suppliers to risk tiers according to the products and services they provide. This determines the frequency and scope of audits they must undergo. The top two risk tiers cover 60% of our supplier spend.

Suppliers in the top risk tier, accounting for approximately 20% of our supplier spend, undergo third-party audits by a recognized international regulatory agency such as the U.S. FDA or ISO, as well as an annual audit by STAAR's supplier quality team.

Suppliers in the second-highest risk tier, accounting for approximately 40% of our supplier spend, are subject to an audit by our supplier quality team every two years, which is outlined in our standard operating procedures.

If we receive non-conforming products from suppliers, we issue supplier correction requests, which allow them to address and rectify the nonconformance. Suppliers who exceed our threshold for supplier correction requests are subject to performance evaluations, which may determine if performance audits are required. If non-compliance is identified during a performance audit, we issue corrective actions.

Product Traceability

We have established procedures to facilitate the traceability of materials and products in our value chain. Incoming materials and components are assigned part numbers for backward traceability, while finished products receive lot numbers for forward traceability.

Our QMS includes protocols to mitigate risks from harmful chemicals, and we have standard operating procedures in place for handling hazardous materials in raw material manufacturing.

Supply Chain Resilience and Business Continuity

In general, we focus on sourcing U.S.-made raw materials where possible. We believe this helps promote a stable supply chain, and that it can mitigate potential tariff risks. To support increased demand, and as part of our business continuity planning, we have recently invested in expanding our manufacturing capabilities at our facility in Nidau, Switzerland, to mitigate the risk of supply chain disruptions.

Our People

1,000+
Employees

27%
roles filled through employee referrals

77%
participation in 2024 Voice of Employee Survey

83%
of employees would recommend STAAR as great place to work

The talented team at STAAR is the powerhouse behind our vision to be the first choice for doctors and patients seeking visual freedom. We strive to create a safe and caring environment where employees with diverse perspectives and backgrounds can enjoy rewarding careers.

Talent Acquisition, Engagement and Retention

We cast a wide net to find the right talent for STAAR, posting on multiple job boards, leveraging our people's networks, and using search firms when appropriate. We also provide a three-year apprenticeship program in Switzerland, as well as informal internship opportunities in the United States. We recently expanded our applicant tracking system and LinkedIn recruitment platform in Switzerland, with the aim of increasing applications, improving efficiency and hiring faster while creating a better experience for candidates and managers.

Talent retention is a point of pride for STAAR. In 2024, our global overall turnover rate was approximately 8% (excluding temporary employees), significantly lower than the medical device industry average of nearly 19%. This strong retention performance reflects STAAR's inclusive workplace culture.

We have formal mechanisms to promote open feedback and grievance reporting. Our employees have annual performance reviews, and we conduct regular engagement surveys to understand evolving employee sentiment and expectations.

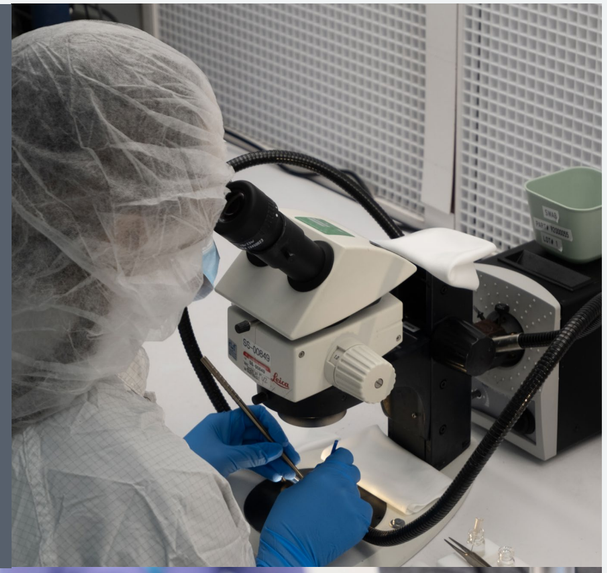
Beyond salaries, we provide competitive compensation and benefits including health insurance, wellness programs, a 401(k) plan (in the U.S.) and employee assistance. Most employees are eligible for flexible working arrangements, and eligible employees are considered for long-term and short-term incentive awards, including equity, during the annual performance evaluation period.

We respect the rights of our employees to freely associate and engage in collective bargaining, in accordance with local laws and regulations.

Learning and Development

Investing in the professional growth of our people is a priority for STAAR. Beyond compliance training, employees have access to online learning platforms offering a vast library of resources to improve their skills and advance their careers. In Switzerland, we also offer English lessons for learners at all levels.

In addition, department leaders have a budget to invest in upskilling their teams based on developmental goals set for their employees.



Equal Opportunity and Inclusion

STAAR is a global company, and we know that having a workforce that reflects our diverse customer and patient base will help us realize our business objectives and vision. We are committed to providing equal opportunities to qualified persons regardless of gender identity or expression, race, color, religion, age, national origin, sexual orientation, marital status, physical or mental disability, or veteran's status. Moreover, STAAR complies with applicable laws prohibiting discrimination and harassment, including in our recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes. As a federal contractor, STAAR has separately developed an affirmative action plan for protected veterans and individuals with disabilities in accordance with applicable regulations. Our commitment to maintaining a work environment free of harassment and discrimination is clearly stated in our Code of Conduct and Employee Handbook.

To foster an inclusive culture, new hires are required to take onboarding compliance training on identifying microaggressions and on respect in the workplace, inclusion and sensitivity. Additionally, California employees must complete harassment prevention refresher training every two years.

We have a cross-functional Diversity, Equity, and Inclusion Committee, which seeks to foster a globally inclusive culture, educate employees, and highlight international observances and holidays. Supported by sub-committees in Switzerland and China, it meets regularly and reports to our executive leadership on our progress.

In 2024, we acknowledged and honored a range of holidays and cultural events, including Lunar New Year, Juneteenth, Hispanic Heritage Month and Diwali.

Employee Safety and Wellbeing

The health and safety of our people is paramount. New hires are required to complete training on hazard communication, blood-borne pathogens, and Methicillin-resistant Staphylococcus aureus (MRSA), with periodic refresher training and emergency response drills thereafter to keep employees vigilant and safe. Additionally, we plan for business continuity with our on-site personnel, so that we optimize for normal operations even during challenging times.

We have numerous standard operating procedures to help our employees carry out tasks in a consistently safe manner. These include the implementation of gowning and personal protective equipment (PPE) mandates for controlled manufacturing zones, and stipulations for managing chemical waste.

The Health and Safety Committee in our Southern California facilities is a cross-functional team of more than 20 employees who meet monthly to review and improve our workplace safety practices.

Our quarterly safety-related inspections, detailed documentation, and proactive corrective actions plans are retained in our computerized maintenance management system, where completions and approvals are tracked and maintained. Comprehensive facilities assessments are conducted quarterly to identify potential hazards in the work environment and introduce appropriate safety measures.

In 2024, we introduced quarterly safety walks in our facilities to proactively identify and address potential hazards. We also implemented a Workplace Violence Prevention Program in compliance with California's amended Labor Code. This includes mandatory online annual training for employees covering emergency exit routes, response protocols, and overall workplace security.

We encourage feedback from employees to help us continuously improve our safety policies, programs, and overall safety culture. Safety is also integrated into our annual employee performance evaluations, and applicable employees are evaluated on their adherence to safe and healthy work practices.

Metric	2023	2024
Total recordable incident rate (TRIR)	1.5	0.9
Days away, restricted, or transferred (DART)	1.1	0.7

Community Giving

Giving back to our communities is an important part of STAAR's efforts to be a responsible corporate citizen.

We also find that our charitable financial donations, in-kind donations, and employee volunteer programs boost the wellbeing of our workforce and contribute to higher talent retention rates. We aim to sponsor and support causes important to our employees, such as the American Red Cross, Ridley Eye Foundation, Holland Foundation for Sight, and Beyond Blindness.

In 2024, the STAAR team completed approximately 760 hours of volunteering. Many of these volunteer hours were with Beyond Blindness, a nonprofit that empowers children with visual impairments and other disabilities to achieve their potential. STAAR volunteers helped support events at their school facility, a fundraising gala and golf tournament, and volunteer sessions at our California facilities in Lake Forest and Monrovia.

Through our global employee charitable matching program, we raised over $87,000 in 2024 in matching funds for over 60 organizations.

Supporting Access to Healthcare

The positive social impact of our ICLs is a great source of pride for the STAAR team, but we recognize that not everyone can afford them. Through our Project My Vision program, we donate product inventory that is either discontinued or near the end of its shelf-life to non-profit clinics serving underprivileged populations. We also donate lenses on a case-by-case basis, such as during the 2023 Hawaii wildfires when we worked with a Maui clinic to issue them to first responders and impacted members of the public. During 2024, we donated approximately 350 ICLs.

Additionally, STAAR employees participate in multiple ophthalmology related non-profit organizations to raise funds for improving ocular health in underserved communities.

In 2024, we began discussions with the Herbert Gavin Eye Institute of University of California, Irvine for sponsorship of the Children's Eye Mobile, which brings vision assessment to underprivileged children in Orange County, CA. As a result, we are one of the 2025 sponsors of this effort.

Safe Harbor

All statements that are not statements of historical fact are forward-looking statements, including statements about any of the following: any statement regarding product manufacturing, safety, design, or objective of management; marketing, business ethics, or supply chain management; environment or social-related aspirational targets or goals; and any statements of assumptions underlying any of the foregoing. Important factors that could cause actions to differ materially from those indicated by such forward-looking statements include the factors set forth in the company's Annual Report on Form 10-K for the year ended December 27, 2024 under the caption "Risk Factors," which is on file with the Securities and Exchange Commission and available in the "Investor Information" section of the company's website under the heading "SEC Filings." We disclaim any intention or obligation to update or revise any projections or forward-looking statements due to new information or events. These statements are based on expectations and assumptions as of the date of this Sustainability Report, and are subject to numerous risks and uncertainties, which could cause results to differ materially from those described in the forward-looking statements.

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Topic	Metrics	Category	Unit of Measure	Code	Response/Comment
Affordability & Pricing	Description of how price information for each product is disclosed to customers or to their agents	Discussion and Analysis	n/a	HC-MS-240a.2	We sell based on established price structures for the specific country in which the customer is located. Such pricing varies by volume purchased and geographic location. In countries where we sell via distributors, our distributors establish their own pricing. In hybrid markets where we engage employees of STAAR to work together with distributors, we collaborate with distributors in establishing pricing structures for certain strategic and alliance customers.
	Percentage change in: (1) weighted average list price and (2) weighted average net price across product portfolio compared to previous reporting period	Quantitative	Percentage (%)	HC-MS-240a.3	0%. We did not change the price of our products compared to the previous reporting period.
Product Safety	(1) Number of recalls issued, (2) total units recalled	Quantitative	Number	HC-MS-250a.1	We had 0 recalls during the reporting period.
	Products listed in any public medical product safety or adverse event alert database	Discussion and Analysis	n/a	HC-MS-250a.2	We had 0 products listed under any public medical product safety or adverse event alert database, including the MedWatch Safety Alerts for Human Medical Products database, during the reporting period.
	Number of fatalities associated with products	Quantitative	Number	HC-MS-250a.3	We had 0 fatalities associated with our products during the reporting period.
	Number of enforcement actions taken in response to violations of good manufacturing practices (GMP) or equivalent standards, by type 1	Quantitative	Number	HC-MS-250a.4	We had 0 enforcement actions taken in response to violations during the reporting period.
Ethical Marketing	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims 2	Quantitative	Presentation currency	HC-MS-270a.1	$0. We had no monetary loses as a result of legal proceedings assocaited with false marketing claims.
	Description of code of ethics governing promotion of off-label use of products	Discussion and Analysis	n/a	HC-MS-270a.2	Ethical Marketing
Product Design & Lifecycle Management	Discussion of process to assess and manage environmental and human health considerations associated with chemicals in products, and meet demand for sustainable products	Discussion and Analysis	n/a	HC-MS-410a.1	Product Quality
	Total amount of products accepted for take-back and reused, recycled or donated, broken down by: (1) devices and equipment and (2) supplies	Quantitative	Metric tonnes (t)	HC-MS-410a.2	STAAR does not take back, reuse, or recycle used products as our medical devices are implanted into patients. Taking back previously implanted medical devices would expose our workforce, and potentially others, to biological hazards.
Supply Chain Management	Percentage of (1) entity's facilities and (2) Tier 1 suppliers' facilities participating in third-party audit programs for manufacturing and product quality	Quantitative	Percentage (%)	HC-MS-430a.1	100% of STAAR manufacturing facilities and Rank 1 suppliers are enrolled in third-party audit programs.
	Description of efforts to maintain traceability within the distribution chain	Discussion and Analysis	n/a	HC-MS-430a.2	Supply Chain Management
	Description of the management of risks associated with the use of critical materials	Discussion and Analysis	n/a	HC-MS-430a.3	2024 Annual Report Item 1. Business pg. 5, 7 Item 1a. Risk Factors pg.16, 19
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption 3	Quantitative	Presentation currency	HC-MS-510a.1	$0. We had no monetary loses as a result of legal proceedings assocaited with false marketing claims.
	Description of code of ethics governing interactions with health care professionals	Discussion and Analysis	n/a	HC-MS-510a.2	STAAR Code of Business Conduct and Ethics
	Number of units sold by product category	Quantitative	Number	HC-MS-000.A	Not Available. STAAR does not report the number of products sold.


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