STAARSURGICAL™

2026 Sustainability Report

Evolution in Visual Freedom

Table of Contents

2026 Sustainability Report

At STAAR, we believe in operating ethically and sustainably to support our patients, customers, employees, partners, and communities.

About This Report

In this Sustainability Report Supplement, we use the terms “we,” “us,” “STAAR,” “STAAR Surgical,” or “the company” to refer to STAAR Surgical Company. Unless otherwise noted, this Report provides data and highlights primarily covering STAAR’s fiscal year 2025 and includes progress on sustainability projects through March 2026. This Supplement is informed by the reporting guidelines set forth by the Sustainability Accounting Standards Board (SASB) Medical Equipment and Supplies industry standards 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.

About STAAR Surgical Company

STAAR Surgical Company (“STAAR”) designs, develops, manufactures, and sells implantable lenses for the eye and the accessory delivery systems used to place the lenses into the eye. For more than 40 years, we have focused exclusively on ophthalmic surgery and are the leading manufacturer of phakic implantable lenses used worldwide in refractive (“corrective”) procedures. Our Implantable Collamer® Lenses (ICLs) are intended to provide visual freedom by reducing or eliminating reliance on glasses or contact lenses. We market 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 deliver premium refractive outcomes while optimizing patient comfort.

STAAR has sold more than 4,000,000 ICLs in more than 85 countries worldwide.

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

2026 Sustainability Highlights

Environmental

992 MWhs of solar energy generation at our U.S. facilities

44% Reduction in freshwater usage for U.S. manufacturing

Social

99% Mandatory compliance training completion

5.8% Decrease in total recordable incident rate (TRIR)

367 Hours volunteered by employees

Governance

Refreshed our Code of Conduct

Developed a standalone Anti-bribery and Anti-corruption Policy

Corporate Responsibility

Board Composition and Structure

As of March 2026, the Board consisted of seven Directors, six of whom are independent under Nasdaq listing standards. Since the start of this year, we have appointed three independent Directors to the Board: Neal C. Bradsher, Richard T. LeBuhn, and Christopher M. Wang, as recommended by our largest shareholder. Together, they bring experience in relevant public market investments and business experience in China, a key market for STAAR. Mr. Bradsher, Chairman of the Board, is the founder and president of Broadwood Capital and a Chartered Financial Analyst. Mr. LeBuhn serves as executive vice president at Broadwood Capital and has prior portfolio management and board experience. Mr. Wang is the founder and chief investment officer of Yunqi Capital with senior experience in Asia-based equity investing and corporate finance. Combined, our Directors bring deep healthcare expertise, executive operating experience, and significant investment and capital-markets backgrounds. This mix ensures robust governance oversight alongside long-term investor perspectives that strengthens decision-making and stewardship on behalf of the company and its stakeholders.

The Board is supported by three standing committees: the Audit Committee, the Compensation Committee, and the Nominating and Governance Committee. Each committee is composed entirely of independent Directors. In 2025 and early 2026, the Board also established three ad hoc committees to support the Board's oversight efforts: the Capital Stewardship Committee to oversee capital planning initiatives, the Search Committee to guide leadership decisions, including the CEO succession process, and the Insight and Engagement Committee to deepen interaction with management, stakeholders, and industry experts.

Governance and 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 standing committees, approves policies that support business ethics. Our Code of Business Conduct and Ethics guides our Directors, officers, and employees worldwide in making ethical decisions and complying with applicable laws and regulations when conducting business. In 2025, we revamped the Code of Conduct to be more comprehensive, adding expanded guidance on anti-bribery and anti-corruption, responsible marketing, and clearer information on reporting potential violations, including how to use the compliance hotline and other reporting channels. In 2026, we plan to introduce a standalone Conflict of Interest Policy with disclosure requirements and a policy governing the acceptable use of generative AI.

All new hires complete Code of Conduct training and certify compliance. Employees complete refresher training and recertify on an annual basis. Contractors, as appropriate, also train and certify as to compliance with the Code of Conduct.

ESG Oversight

The Board oversees the identification, mitigation, and management of our major business risks and overall risk profile. The Board has delegated oversight of development and adherence to our 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 strategy and initiatives.

Management has established an ESG Committee to oversee ESG strategy and initiatives, including data gathering, risk assessment, objectives, and disclosures. It meets at least twice annually, reports to executive leadership, and provides periodic updates to the Board. There are three supporting bodies which all report to the ESG Committee, including: the ESG Working Group, which manages ESG data quality, regulatory compliance, and annual disclosures and meets quarterly; the Culture Committee, which promotes a globally inclusive culture and employee education and meets quarterly; and the Climate Risk Working Group, which reviews material climate risks and implements mitigation and disclosure programs and meets at least annually.

Cybersecurity and Data Privacy

Our Chief Information Officer leads a dedicated committee with IT operations, information security and privacy leadership, including the Chief Privacy Officer, to identify, manage, and mitigate cybersecurity and data privacy risks. The Board reviews cybersecurity and privacy at least annually and receives additional briefings as needed. We align our program with the NIST Cybersecurity Framework, and employees complete mandatory annual data protection training along with regular phishing simulation tests.

Whistleblower Policy

We maintain a Compliance Hotline and Website that enable employees, suppliers, customers, and other third parties worldwide to report concerns about potential unethical conduct. The service is operated by an independent third-party provider, is available 24 hours a day in local languages, and is communicated on www.staar.com, on our intranet, and in our Code of Conduct.

Reports are handled confidentially and may be submitted anonymously, where permitted by local law. All reports are reviewed and investigated promptly, and appropriate corrective or disciplinary actions are taken when claims are substantiated. As set out in our Code of Conduct, we prohibit discrimination or retaliation against any employee who makes a good faith report or participates in an investigation.

Anti-bribery and Anti-corruption

We maintain a zero-tolerance policy for bribery and corruption. In 2025, we introduced a standalone Anti-Bribery and Anti-Corruption Policy and separate Global Ethical and Marketing Interactions with Healthcare Professionals Guidelines to further clarify expectations for interactions with healthcare professionals and government officials and for responsible marketing across regions. These policies complement our Code of Conduct and apply globally, with employees in relevant roles completing annual training on them.

We monitor and review expenditures related to healthcare professional engagements to establish compliance with modest meal spending limits and to validate that events serve educational purposes. We also review customer-related spending as part of the purchase order process. These controls support adherence to our interactions and marketing guidelines.

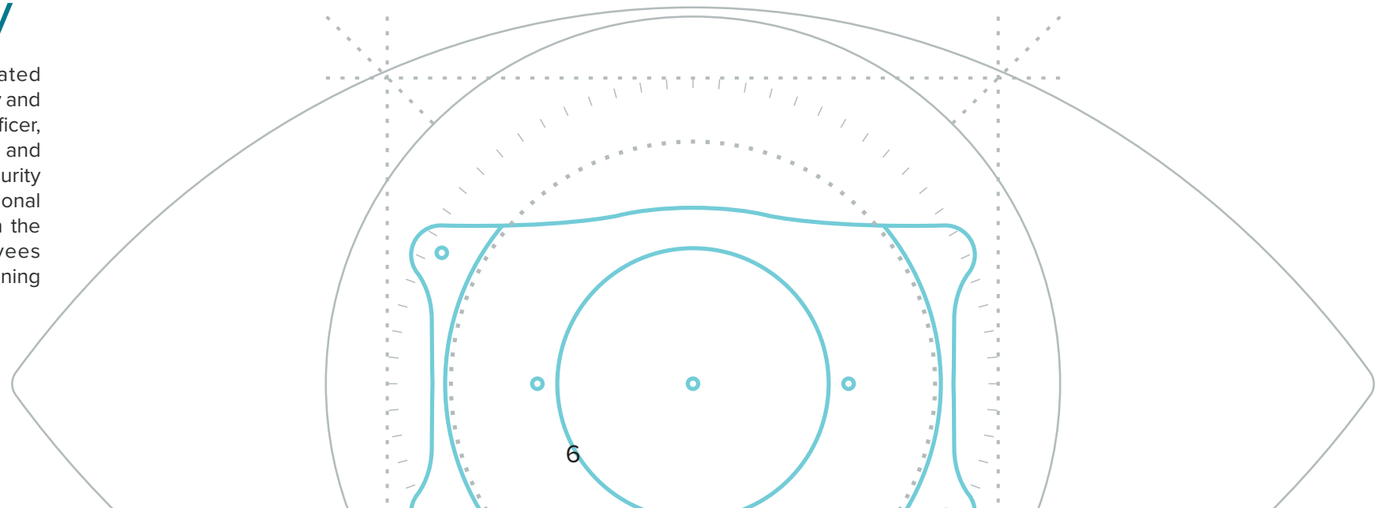
We perform due diligence on all new distributors and require them to regularly certify compliance with STAAR's Code of Conduct, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act at onboarding and recertify annually. Certain vendors that have physician financial relationships or interact with the government on our behalf also complete compliance and certifications.

Ethical Marketing

As set out in our Code of Conduct and further detailed in our Global Ethical and Marketing Interactions with Healthcare Professionals Guidelines, STAAR employees are prohibited from making untrue, misleading, deceptive, or fraudulent statements about our products and services or from taking unfair advantage of anyone. We also prohibit the improper promotion of off-label use of STAAR products in accordance with the U.S. Food, Drug, and Cosmetic Act and other applicable laws.

We provide educational events for customers in a responsible manner, aligned with industry guidelines and our Global Ethical and Marketing Interactions with Healthcare Professionals Guidelines. We monitor the effectiveness of related controls and deliver regional training for marketing teams. We also investigate credible reports of potential violations of our ethical marketing standards and take corrective action when warranted.

We maintain a medical, legal, and regulatory review process for advertising and promotional materials, as well as for clinical publications and presentations. This process is designed to confirm that statements are consistent with our regulatory approvals and that descriptions of features, benefits, data, and analyses are accurate and not misleading. Our cross-functional teams use a comprehensive content lifecycle management platform to centralize reviews, and we have issued guidelines on marketing regulations in key jurisdictions where we operate to support consistent compliance.



Environmental Sustainability

We seek to contribute to a sustainable future by using energy and water responsibly, minimizing hazardous waste, transitioning to lower carbon operations, and strengthening our climate resilience. In 2025, we adopted a standalone Environmental Policy that formalizes these commitments and guides our programs across sites and functions. We also reiterated this commitment in our Code of Conduct, reinforcing accountability for environmentally responsible practices and supporting actions to safeguard our business from risks associated with climate change.

Hazardous Waste

Responsible waste management lowers cost and protects the environment. We track hazardous waste, work with certified vendors for transport, treatment, storage, and disposal, and test wastewater regularly to support compliance. In 2025, we recorded zero instances of hazardous waste or environmental noncompliance, and total hazardous waste was 69 tons, an increase of about 3 percent from 2024. Since 2023, we have cleaned waste glassware from industrial processes so it can be recycled rather than entering the hazardous waste stream. We manage electronic waste in line with regulations, with our information technology team coordinating vendor handling, disposal, and recycling where possible. Where feasible, we aim to reduce paper. For example, in our Monrovia, California manufacturing facility, we now use electronic work-order kiosks, and where permitted, we use electronic Directions for Use (eDFU) instead of paper DFUs. In addition, our electronic quality management system now supports digital, rather than paper-based, workflows.

Water

We recognize that manufacturing drives most of our water usage, making responsible water management a key priority across operations and sustainability initiatives. Our Monrovia, California facility is located in an area of high-water stress, which makes conservation and quality control especially important. Over the last year, our total water use decreased notably, driven in part by the closure of our advanced manufacturing facility in the first half of 2025. We track site-level consumption and are evaluating efficiency and reuse opportunities to moderate future demand while supporting production needs.

At our manufacturing facility in Monrovia, we have integrated water purity and boiler metrics into our building management systems to improve visibility, support proactive maintenance, and reduce avoidable losses. We have also installed motion sensor faucets and low-flow fixtures in restrooms to cut discretionary use and improve efficiency. Together, these actions help us manage consumption more precisely, maintain consistent process quality, and lessen our impact in a water-constrained region. We will continue to evaluate additional measures, including broader fixture upgrades, leak detection analytics, and process water recirculation where feasible.

Climate

We calculate our operational Scope 1 and Scope 2 greenhouse gas emissions in accordance with the World Resources Institute Greenhouse Gas Protocol. As our business grows, we track performance using greenhouse gas (GHG) intensity, which is our ratio of energy use per 1,000 dollars of revenue.

Our Scope 1 and Scope 2 emissions encompass all facilities where we have operational control, including our international facilities and commercial offices. This broader boundary provides a more comprehensive and transparent view of our emissions profile. In 2025, our total emissions decreased compared to 2024.

Our Climate Risk Working Group identifies, assesses, and addresses climate risks and opportunities and reports to executive leadership. With core operations in Southern California, we face drought and wildfire risk, and our facilities in California and Japan also face seismic risk. To build resilience and support demand, we are expanding capacity at a second manufacturing site in Nidau, Switzerland, maintaining finished lens inventories across global sites, and building inventory of our proprietary Collamer® material used in our ICLs. We also monitor new climate regulations and potential compliance costs and will adjust our strategy as needed.

Energy

We strive to reduce our carbon footprint by improving energy efficiency and transitioning to renewable energy, a strategy that also delivers strong business value. Over the last four years, we invested in solar at our Southern California sites in Tustin, Lake Forest, and Monrovia. In 2025, these systems generated approximately 992 MWh and met about 17% of our total energy needs. To enhance reliability and capture peak savings, our Monrovia manufacturing facility uses battery storage and a backup generator to store excess solar power and support operations during peak demand. The combination of on-site generation, energy storage, and backup power helps sustain critical operations through grid disruptions and price volatility, supporting business continuity.

To further cut consumption, we are upgrading single phase HVAC systems at our Lake Forest and Monrovia sites to three phase systems in line with California Title 24 building energy efficiency standards. We also expanded workplace electric vehicle charging at our corporate headquarters in 2025 and offer it free to employees to encourage low emission commuting.

Product Quality and Safety

Our Quality Manual guides quality and safety for our products from design and sourcing through manufacturing, packaging, distribution, and post-market surveillance, and incorporates our Quality Policy to meet customer requirements and support positive patient outcomes.

We align our practices with international medical device quality and safety standards, including the following ISO standards:

- **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 routinely test our products, as well as the materials and components used in them, for biocompatibility, sterility, and endotoxins. We also conduct ongoing process validation and cleanroom assessments and monitoring.

Quality Management System

Our processes are maintained and continually improved through our quality management system (QMS), which complies with ISO 13485. The QMS is foundational to our compliance with the U.S. FDA Quality System Regulation and undergoes certification by our EU Notified Body and audits by other regulatory authorities.

In 2025, we continued implementing an electronic QMS to improve data integrity and compliance, replacing paper and PDF workflows and streamlining document control, training, audits, supplier monitoring, nonconformance reports, and corrective and preventive actions (CAPA).

Training for Employees, Suppliers, and Surgeons

New employees complete training on our Quality Manual and any assigned standard operating procedures, followed by periodic refresher training. All employees complete annual training on the core elements of our QMS and standalone training on complaint handling. Any revision to the Quality Manual automatically triggers mandatory training. Any employee who becomes aware of an alleged product deficiency is required to report it within 24 hours.

Relevant suppliers, including calibration providers, complete STAAR-provided training on applicable standard operating procedures.

Surgeon customers are required to complete EVO ICL certification training and demonstrate sufficient product knowledge and procedural proficiency before performing surgery with our lenses. The structured program includes didactic learning and hands-on simulated surgical practice, followed by successful completion of multiple surgical cases at the surgeon's facility under the observation of a STAAR clinical representative or a designated surgical proctor.

We offer STAAR University, an online platform and resource library, to support appropriate scientific exchange. It provides surgeons with access to publications, key clinical outcomes data, and other resources that support clinical confidence.

Continuous Improvement

In compliance with the EU Medical Device Regulation (MDR), we provide product data, including adverse events, complaints, corrective actions, and clinical evaluation results, through our annual Periodic Safety Update Report submitted to our EU Notified Body and, where required, through other regulatory channels.

The Device Safety Committee, comprising Quality and Medical Affairs, meets quarterly to review product performance and trends and to confirm risks remain within acceptable limits. Findings are reported at quarterly Quality Management Review meetings with cross-functional executives, including the Chief Executive Officer and Chief Operating Officer.

Quality System and Safety Audits

Our manufacturing facilities undergo regular audits by our internal Quality team and by independent auditors. Our EU Notified Body performs external assessments for compliance with ISO 13485 and the EU Medical Device Regulation (MDR). We also participate in the Medical Device Single Audit Program (MDSAP), which is recognized by regulators in Australia, Brazil, Canada, Japan, and the United States.

In 2025, our EU Notified Body conducted a surveillance audit across our five facilities in the United States and Switzerland, covering ISO 13485, the Medical Device Single Audit Program (MDSAP), and the EU Medical Device Regulation (MDR). The audit was completed successfully. During the year, we also underwent a third-party distributor audit of our Brugg, Switzerland facility, which concluded with a successful outcome.

Social Responsibility

Talent Retention and Development

To reach top talent, we recruit across multiple channels, including job boards, employee networks, and select search firms. In Switzerland, our applicant tracking system and LinkedIn recruitment platform support the process by increasing applications, streamlining workflows, shortening time to hire, and improving the experience for candidates and managers. We also offer a three-year apprenticeship program in Switzerland and informal internship opportunities in the United States to support early career development.

We maintain formal channels for open feedback and grievance reporting. Employees receive annual performance reviews, and we conduct regular engagement surveys to understand evolving sentiment and expectations. We also offer competitive pay and benefits, including health insurance, wellness programs, a 401(k) plan in the United States, and employee assistance resources. Most employees are eligible for flexible working arrangements, and during the annual performance evaluation period eligible employees are considered for long-term and short-term incentive awards, including equity. We respect employees' rights to freely associate and to engage in collective bargaining in accordance with local laws and regulations.

Investing in the professional growth of our people is a priority at STAAR. Beyond compliance training, employees have access to online learning platforms with a broad library of resources to build skills and advance their careers. In Switzerland, we also offer English lessons for learners at all levels. Department leaders have budgets to support upskilling based on employees' development goals.

Health and Safety

The health and safety of our people come first. New hires complete training on hazard communication, bloodborne pathogens, and methicillin resistant Staphylococcus aureus (MRSA), with periodic refreshers and regular emergency response drills. We also maintain business continuity plans for on-site teams to sustain normal operations during challenging conditions.

We maintain comprehensive standard operating procedures to promote safe, consistent work practices. These include gowning and personal protective (PPE) equipment requirements in controlled manufacturing areas and defined processes for chemical waste management.

Each quarter, we conduct facilities assessments and safety walks across our sites to proactively identify and address potential workplace hazards, confirm that existing controls are effective, and implement appropriate safety measures to protect our people. We also maintain a Workplace Violence Prevention Program in compliance with California's amended Labor Code, which includes mandatory annual online training for employees on emergency exit routes, response protocols, and overall workplace security.

We actively seek and act on employee feedback to continually improve our safety policies, programs, and overall safety culture. Safety expectations are integrated into annual performance evaluations, and employees in applicable roles are assessed on their adherence to safe and healthy work practices.

Equal Opportunity and Inclusion

As a global company, we recognize that a workforce reflecting the diversity of our customers and patients strengthens performance and advances our vision. We provide equal opportunity to qualified individuals regardless of gender identity or expression, race, color, religion, age, national origin, sexual orientation, marital status, physical or mental disability, or veteran status. We comply with laws that prohibit discrimination and harassment across the employment life cycle. Our commitment to a workplace free from harassment and discrimination is set out in our Code of Conduct and Employee Handbook. As a federal contractor, STAAR has separately established an affirmative action plan for protected veterans and individuals with disabilities in accordance with applicable regulations.

We promote inclusion through required onboarding training for new hires covering respect in the workplace, inclusion, and sensitivity. California employees also complete harassment prevention refresher training every two years.

To advance inclusion, we convene a cross-functional Culture Committee that educates employees, celebrates international observances and holidays, and strengthens a globally inclusive culture. Subcommittees in Switzerland and China support its work, and the Committee reports regularly to executive leadership.

Community Giving

We support our communities through targeted giving and volunteerism. Our charitable financial and in-kind donations, together with employee volunteer programs, support local needs and promote employee well-being and engagement. We sponsor and support causes that matter to our people, including the American Red Cross, Ridley Eye Foundation, Holland Foundation for Sight, and Beyond Blindness.

In 2025, STAAR team members contributed approximately 367 volunteer hours. Many of these hours supported Beyond Blindness, a nonprofit that empowers children with visual impairments and other disabilities.

Supply Chain Management

We aim to provide safe and compliant medical devices, consistent with applicable regulations and our quality management system, to support patient outcomes. We ask suppliers to meet standards of integrity and transparency that align with STAAR's own standards.

We use a risk-based approach to qualify and monitor suppliers to help safeguard quality and traceability in line with applicable laws and regulations and to reduce the risk of supply chain disruptions. As a seller of Class III medical devices, we require certain suppliers to maintain their own quality management system (QMS) and comply with international regulations and standards, including ISO 13485. When a material or product is critical, our evaluation also considers how prospective suppliers manage their Tier 1 suppliers.

We assess prospective suppliers for alignment with our Supplier Code of Conduct, which sets expectations for anti-bribery and anti-corruption, human rights (including the prohibition of child labor and other forms of modern slavery), safe and healthy working conditions, grievance mechanisms, environmental stewardship, data protection, and legal compliance. Suppliers that provide materials, products, or services directly related to our devices fall under our QMS and must acknowledge the Code and agree to risk-based audits before approval.

We use a risk-based tiering model to approve and monitor suppliers based on the products and services they provide. The tiers determine the frequency and scope of required audits, and the top two tiers represent about 60 percent of our supplier spend. Suppliers in the top risk tier, which account for approximately 20 percent of spend, undergo third-party audits or inspections by recognized regulatory authorities or certification bodies (for example, U.S. FDA inspections or ISO 13485 certification), as well as an annual audit by STAAR's supplier quality team. Suppliers in the second highest risk tier, which account for approximately 40 percent of spend, are audited by our supplier quality team every two years, as outlined in our standard operating procedures. When we receive nonconforming products, we issue supplier correction requests so suppliers can address and remedy the nonconformance. Suppliers that exceed our threshold for supplier correction requests are subject to performance evaluations, which may lead to performance audits. If an audit identifies noncompliance, we issue corrective actions.

We support traceability across the value chain by assigning part numbers to incoming materials for backward traceability and lot numbers to finished products for forward traceability. Our QMS includes controls for chemical risk mitigation and SOPs for handling hazardous materials in raw material manufacturing.

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 January 2, 2026 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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