



STAAR SURGICAL CORPORATION

HUMAN AND WORKFORCE RIGHTS POLICY

STAAR Surgical Corporation (“STAAR”) is committed to upholding human and workplace rights throughout our company. STAAR respects international human rights principles, including the International Labor Organization Declaration on Fundamental Principles and Rights at Work. This Human and Workforce Rights Policy sets forth key principles that guide us in operating our business in order to achieve this goal.

- 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.
- 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:
 - o 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;
 - o 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 job-seekers to enhance representation in the applicant pool for all levels of the workforce; and
 - o 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.

- STAAR complies with applicable laws and regulations relating to wages, work hours, overtime and benefits. We believe in providing fair, performance-based compensation. We provide opportunities for our employees to build rewarding careers and healthy, balanced lives.
- 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, and that STAAR's workplace complies with applicable laws, regulations, and policies. Employees are encouraged to express concerns and provide input to ensure a compliant working environment.
- STAAR respects the ability of employees to choose whether or not to join unions and engage in collective bargaining, as permitted by applicable laws in the countries where we do business.
- We expect our employees to adhere to our Code of Business Conduct and Ethics, and believe they should "do the right thing" in all business activities. 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.

- We encourage you to report any suspected or actual violation of this Human and Workforce Rights Policy, either via our Compliance Officer (complianceofficer@staar.com; 626.303.7902, x2231), or via our Ethics Hotline (telephone toll-free in the United States at 1-800-826-6762). We will not retaliate or discriminate in any manner against anyone because he or she in good faith reports any suspected or actual violation.