



Supplier Code of Conduct

STAAR Surgical Company is committed to reaching our 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.

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. Our expectations for suppliers include the following:

Conditions of Employment

Your company shall support all laws pertaining to prohibition of the use of child labor or any form of forced labor, slavery, or human trafficking. You must also support the right of workers to join associations and engage in collective bargaining. You shall work within applicable laws and regulations in regards to work hours, fair compensation, and benefits. You shall have a zero-tolerance policy towards abuse, discrimination, and harassment, and support and provide a healthy, safe, and sanitary work environment. We do not currently verify or audit our suppliers specifically to evaluate risks of human trafficking and slavery or require our suppliers to certify that materials incorporated into products comply with such laws. Our Code of Business Conduct and Ethics ("Code") sets forth our commitment to comply with applicable laws, including employee and human rights. All employees receive regular training regarding our Code. We hold employees accountable for complying with our Code.

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.

Compliance

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.

You must be able to demonstrate compliance with this Supplier Code of Conduct upon our request, and we expect you to take action to correct any non-compliance. We reserve the right to audit our suppliers to ensure compliance, and terminate an agreement with any supplier who cannot demonstrate such compliance with applicable laws and regulations.

STAAR expects our partners to share our commitment to ethical and principled conduct, and to develop and implement internal business processes to assure compliance with all applicable laws and regulations, as well as this Supplier Code of Conduct.