

 STAAR SURGICAL		
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Global Anti-Bribery and Anti-Corruption Policy		

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1. PURPOSE AND POLICY

1.1 The purpose of this Global Anti-Bribery and Corruption Policy (this “Policy”) is to establish guidelines and procedures to foster compliance by STAAR Surgical Company (the “Company”) with global and national anti-bribery, anti-corruption standards, laws, and industry guidelines (“ABAC Laws”). The Company does business directly or indirectly in over 75 countries around the globe, each of which has its own unique laws, customs, and business practices, and this Policy contains information intended to reduce the risk of corruption and bribery from occurring in the Company’s activities. This Policy is intended to reiterate the Company’s commitment to integrity in the conduct of its business and to assist Company Personnel (as defined below) in understanding the requirements of ABAC Laws. Consistent with this commitment, no individual will suffer adverse consequences for refusing to offer or make a corrupt payment, even if it may result in the loss of business.

1.2 It is the policy of the Company that all Company Personnel conduct business in alignment with ABAC Laws. The Company strictly prohibits all forms of corruption and bribery and will take all necessary steps to see to it that corruption and bribery do not occur in its business activities. This Policy prohibits all forms of bribery, corruption, and unethical business practices, whether involving government officials or private parties. Company managers are responsible for promoting awareness of and enforcing compliance with this Policy among their personnel and must not actively or passively authorize or ignore corrupt activities in their organization.

2. PERSONS SUBJECT TO THIS POLICY

2.1 This Policy applies to all directors, officers, and employees of the Company and its subsidiaries, as well as any contractors and consultants (collectively referred to as the “Company Personnel”).

2.2 In addition, all other third-party representatives acting for or on behalf of the Company and its subsidiaries, wherever they are located, including all vendors, distributors, resellers, importers, and commercial agents shall be subject to this Policy and shall be considered Company Personnel hereunder. Any such third party that interacts with a foreign government official (including health care professionals) is referred to as a “Foreign Agent” herein.

3. APPLICABLE LAWS AND REGULATIONS

3.1 As a result of the Company's global operations, the Company is subject to a number of ABAC Laws, including the United States (U.S.) Foreign Corrupt Practices Act ("FCPA"), the United Kingdom (U.K.) Bribery Act, and the Organization for Economic Co-operation and Development Anti-Bribery Convention, as well as other anti-corruption laws in countries where the Company operates. Where local laws are stricter, they prevail; otherwise, this Policy applies.

3.2 Under the FCPA, it is illegal for U.S. persons, including U.S. companies or any companies traded on U.S. exchanges, and their subsidiaries, directors, officers, personnel, consultants and third parties interacting on their behalf, to bribe (directly or indirectly) foreign government agencies or officials. Foreign government officials include government personnel and healthcare professionals ("HCPs") at public hospitals, state universities or individuals with national health service roles.

3.3 Understanding the full scope of the FCPA is essential as it directly affects everyday business interactions between the Company and foreign government officials and government-owned or government-controlled entities. Violations of the FCPA can also result in violations of other U.S. laws, including anti-money laundering, mail and wire fraud, and conspiracy laws. The penalties for violating the FCPA are severe. In addition to being subject to the Company's disciplinary policies (including termination), individuals who violate the FCPA may also be subject to imprisonment and fines.

3.4 The U.K. Bribery Act extends ABAC Law prohibitions to commercial bribery. Many countries additionally have local regulations prohibiting the use of undue influence or unfair competition to induce HCPs to act in violation their duty of care to patients, such as offering improper benefits in exchange for future orders or to reward past orders.

4. PROHIBITED PAYMENTS

4.1 Improper Inducements. The Company strictly prohibits bribery in any form, including but not limited to, the following:

- offering, promising, giving, or authorizing anything of value (e.g., cash, gifts, entertainment, travel, favors, employment) to any person (including government officials or customers) to improperly influence a business decision or gain an unfair advantage;
- requesting, accepting, or agreeing to receive a monetary bribe or kickback in exchange for business benefits; and
- promising or giving of a non-monetary bribe or kickback, including gift, entertainment, travel, or a favor.

If a foreign government official or customer requests or demands any such benefit, either directly or through a family member or other third party, report this immediately (see *Duty to Report* below).

4.2 Commercial bribery. All forms of commercial bribery (i.e., bribery of non-governmental parties) are prohibited, including the offer, promise, authorization of payment, or payment or provision of anything of value to any employee or representative of another company to induce or reward the improper performance of any function or any business-related activity. Company Personnel also shall not request, agree to receive, or accept anything of value from any employee or representative of another company or entity as an inducement or reward for the improper performance of any function or business-related activity.

4.3 Facilitation payments. The Company strictly prohibits facilitation payments (small payments made to expedite routine government actions). Even if facilitation payments are customary in some regions, they are against Company policy and must not be offered or authorized. Company Personnel must always seek lawful alternatives (e.g., proper alternatives, escalation to compliance) to avoid facilitation payments. In the rare circumstance that Company Personnel are subject to a threat of immediate physical harm by a person demanding a facilitation payment, a payment may be made, provided that the payment and all circumstances surrounding it are reported immediately to the Office of the General Counsel. Any facilitation payment must be properly and transparently recorded in Company's books and records.

4.4 Cash payments. Cash payments of any kind to a third party, other than documented petty cash disbursements or other valid and approved payments, are prohibited. Company checks shall not be written to "cash" or anyone other than the party entitled to payment except to replenish properly used petty cash funds.

4.5 Political and charitable contributions. In general, contributions to candidates for non-U.S. political office and charitable contributions to non-U.S. charities are prohibited. In limited circumstances, bona fide contributions may be permitted with pre-approval in writing by Compliance and the Chief Financial Officer.

5. PERMITTED PAYMENTS

5.1 Promotional hospitality, marketing expenses or service agreement fees. In general, ABAC Laws permit Company Personnel to pay for the reasonable cost of a foreign government official's meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion, demonstration, or explanation of Company products or services, or the execution of a contract with a government or agency. Lavish entertainment, such as luxury resorts, sporting events, and first-class travel, is strictly prohibited. Special rules apply to HCPs. See STAAR's Global Ethical Marketing and Interactions with Health Care Professionals Guidelines.

5.2 Promotional gifts. In general, ABAC Laws permit Company Personnel to provide promotional gifts of nominal value (less than \$25 USD) to a foreign government official as a courtesy in recognition of services rendered or to promote goodwill. These gifts must be nominal in value and should generally bear the trademark of the Company or one of its products. Special rules apply to HCPs. See STAAR's Global Ethical Marketing and Interactions with Health Care Professionals Guidelines.

5.3 Other payments. Other bona fide payments may be permissible in certain jurisdictions, provided they are not an improper inducement or otherwise prohibited under ABAC Laws. As customary business practices vary globally, and it is not always clear what payments may be lawfully made in certain jurisdictions, Company Personnel should contact Compliance or Legal for assistance in properly navigating local requirements.

6. WORKING WITH THIRD-PARTY REPRESENTATIVES

6.1 As the Company will generally be held liable under ABAC Laws for third parties acting for or on its behalf, Company Personnel must carefully assess the engagement of any new third-party representatives hired to conduct business outside of the U.S. and monitor continued engagement of such third parties. Company Personnel must follow the guidelines and processes set forth in this Section 6 with respect to engaging third parties, including conducting due diligence with respect thereto. These steps, and the related due diligence efforts, must be accurately and thoroughly

documented by Company Personnel and Compliance. If any inconsistencies are discovered during the due diligence review or if there are concerns about a third-party representative's services, then, before engagement, the business owner or Compliance must: (i) consult the Company's Chief Legal Officer; and (ii) obtain the written approval from the Commercial VP or SVP with responsibility for the region.

6.2 Contractual provisions. Any Company Personnel engaging a Foreign Agent should formalize the engagement in a written agreement approved by Legal. This written agreement should include a commitment from the Foreign Agent that it agrees not to engage in improper business conduct, such as bribery, with the intent to improperly influence behaviors or obtain any benefit for the Company's business interests. This commitment may reduce the risk of a violation and may provide evidence of the Company's intent to comply with anti-bribery laws, including the FCPA.

6.2.1 Purchasing will require a certification of compliance with applicable ABAC Laws (including FCPA) from all Foreign Agents ("FCPA certification"). Any waivers or modifications to the standard template(s) must be approved by Compliance. High-risk Foreign Agents (based on third party risk assessment) may be required to re-certify compliance periodically.

6.2.2 Foreign Agents that are distributors, importers, resellers, and sales agents (collectively "Distributors") must execute a certification to abide by ABAC Laws and the Company's Code of Business Conduct and Ethics as part of their contract execution and renewals. High-risk Distributors may be required to re-certify compliance annually or in response to any red flags or adverse media.

6.2.3 Foreign Agents that are HCPs may certify compliance as to ABAC Laws pursuant to the Company's Master Consulting Agreement for HCPs, which contains provisions related to compliance with ABAC Laws, instead of an FCPA certification. However, one-time, or modified agreements may not have this provision, in which case the HCP would need to execute an FCPA certification. Questions may be directed to Legal or Compliance.

6.3 Initial due diligence. Before engaging a new Foreign Agent, the Company must conduct careful due diligence to confirm that business will be conducted in an ethical and lawful manner. When onboarding Foreign Agents that are Distributors, Company Personnel must submit to legal@staar.com (with a copy to Customer Service AG) (i) an ABAC questionnaire, completed by the Company Personnel, and (ii) a second ABAC questionnaire, completed by the proposed new Distributor, with supporting documentation on its financial statements, business references, and compliance program. Such questionnaires, as they may be modified from time to time, shall seek sufficient information to answer the questions set forth below in in Section 6.3.1 – 6.3.4. A contract with the new Distributor cannot be completed until Compliance completes the due diligence process and provides its approval. When onboarding a new Foreign Agent (vendor) that is not a Distributor, (i) Company Personnel must consider the questions set forth below in Sections 6.3.1 – 6.3.4; and (ii) the Foreign Agent must certify compliance to ABAC Laws using an approved Company template.

6.3.1 Due diligence question #1: Can the Foreign Agent perform the requested services? The Company Personnel seeking to engage the Foreign Agent should conduct an initial assessment to determine whether it is legal under local law for the Foreign Agent to perform the requested services and whether the Foreign Agent is able to perform the services. Then, the Company Personnel should research the Foreign Agent's past performance, experience, expertise, qualifications, and competency to justify their engagement and level of compensation. This review should include gathering the type of information otherwise required for making any prudent business decision, which may include visiting their place of

business to confirm its staffing and operations are consistent with its representations, as well as obtaining business references or other assurances.

6.3.2 Due diligence question #2: Are there any relationships between the Foreign Agent and foreign officials? The Company Personnel seeking to engage the Foreign Agent should conduct an initial assessment of any such relationships, including whether the company is owned, directly or indirectly, by the government or a government official, and whether the Foreign Agent is related to members of the country's ruling party or family. The Company Personnel should consider whether the Foreign Agent (or its personnel or family members) hold or held political office or other appointment to a party or official government position that may require further assessment under ABAC Laws. In addition, if the Foreign Agent was recommended by a foreign government official, or by a person or entity with business connections to a foreign entity, further review should be undertaken.

6.3.3 Due diligence question #3: Is the proposed compensation reasonable? The Company Personnel seeking to engage the Foreign Agent should consider whether the proposed compensation is consistent with the "fair market value" for such services in the jurisdiction. In addition, any unusual payment requests, including directing that a payment be sent to another country or requiring an unusually large "up-front" payment, must be assessed for compliance with ABAC Laws. Compensation that is not in line with local market rates or practices may be a sign that there are "facilitation payments" or bribes being made in potential violation of local laws or the FCPA.

6.4 Additional due diligence. For certain Foreign Agents designated as "High-risk," additional due diligence may be required by Compliance. Compliance may conduct additional due diligence activities based on the particular facts and circumstances of the engagement in keeping with the risk, such as (i) the Corruption Perception Index for the country or countries in which the business will take place, (ii) whether the Foreign Agent will work directly with government agencies on the Company's behalf, is government owned or personnel a foreign official, and (iii) whether the Foreign Agent cannot demonstrate an ABAC compliance program. Such additional diligence activities shall seek sufficient information to address any potential compliance red flags or questions regarding the Foreign Agent's integrity, including those set forth below in in Sections 6.4.1 – 6.4.2.

6.4.1 Potential red flags. If a Foreign Agent requests that its identity be held confidential, or requests that the Company work through intermediaries, it could be a red flag for compliance issues under ABAC Laws. In addition, if the Foreign Agent refuses to certify or make a representation as to compliance with ABAC Laws, fails to cooperate with the diligence review, or provides non-responsive or incomplete answers to questions, additional diligence should be conducted.

6.4.2 Questions regarding integrity. For "High-risk" Foreign Agents, a review of published press reports (i.e., adverse media) and a check of global watch lists (e.g., OFAC, global sanctions) should be conducted to assess the integrity of the Foreign Agent. In addition, in the event of questionable press reports or if otherwise appropriate, reference checks should be obtained.

6.5 Ongoing monitoring. Company Personnel working with Foreign Agents must regularly review these relationships for compliance, with enhanced scrutiny for High-risk Foreign Agents. This includes scrutinizing all expenses before processing a reimbursement and requiring documentation to support

any expenses incurred on the Company's behalf. In particular, Company Personnel should be mindful of any statements by a Distributor or Foreign Agent that a certain amount of money is needed to "get the business" or "make the necessary arrangements," or if a request is made for a charitable or political contribution. In addition, any requests for Company Personnel to prepare any false documentation, like purchase orders or invoices, are red flags. Ongoing monitoring of relationships with Foreign Agents shall also be conducted by the Company's Internal Audit function, which shall incorporate into its annual audit plan a risk-based review of the Company's interactions with foreign government officials, customers, and other relationships identified as "High-risk."

7. RECORD-KEEPING AND ACCOUNTING STANDARDS

7.1 It is important that the Company maintain accurate, complete, and transparent records in all aspects of its business. Accurate record-keeping is essential for regulatory compliance, financial integrity, and maintaining the trust of Company stakeholders, including patients, customers, regulators, and shareholders. The Company, all Company Personnel and Foreign Agents shall maintain all records documenting transactions and transfers of value for business conducted on or for the benefit of the Company, including services payments, purchases, donations, commissions, rebates, expense contributions and reimbursements, gifts, fees or taxes to foreign agencies, any transfers of value to government agencies or personnel, and other such transactions. Records must reflect the true nature of each transaction and be supported by appropriate documentation. No "off-the-books" accounts or undisclosed funds may be maintained under any circumstances. Failure to maintain proper records constitutes a violation of this Policy and may result in disciplinary action, up to and including termination. For Foreign Agents, improper documentation may lead to contract termination. The Company reserves the right to pursue legal action for deliberate falsification of records, which may result in civil or criminal penalties under applicable laws.

7.2 It is the Company's policy to implement and maintain internal accounting controls based upon sound accounting principles. All accounting entries in the Company's books and records must be timely and accurately recorded and include reasonable detail to fairly reflect transactions. These accounting entries and the supporting documentation must be periodically reviewed to identify and correct discrepancies, errors, and omissions.

7.3 For any transaction involving the provision of anything of value to a foreign government official, such transaction may only occur with appropriate prior Company authorization, must be recorded in accordance with generally accepted accounting principles, and must be tracked in a separate log or record with supporting documentation. Such supporting documentation shall include (i) the name and position of the Company Personnel requesting and authorizing the transaction, (ii) the name and position of the foreign government official, and (iii) a description of the transaction, including the value thereof, as well as all relevant details, products or services provided, contract terms, etc.

8. DUTY TO REPORT

8.1 Any Company Personnel having information about or knowledge of any conduct inconsistent with this Policy should promptly report such matter to their manager, Compliance (complianceofficer@staar.com), Legal (legal@staar.com), or through the Company's Compliance Hotline (1.800.299.6012) or Website (<https://staar.ethicspoint.com>) (which lists additional hotline numbers for reporters outside the U.S.).

8.2 The Company's Compliance Hotline and Website are an essential resource designated to provide Company Personnel and any other stakeholders with a secure means to report any suspected or observed misconduct, including violations of our Code of Business Conduct and Ethics, regulatory requirement, or Company policies. All Company Personnel are encouraged to use the Hotline and Website. All reports will be treated with confidentiality, and information will be shared on a need-to-know basis during the investigation process. Individuals may choose to remain anonymous if allowed by local regulations. While anonymous reports may limit the Company's ability to follow up for additional details, every effort will be made to investigate all credible concerns.

8.3 The Company maintains a strict policy against retaliation for anyone who, in good faith, reports a concern or participates in an investigation. Any form of retaliation will be subject to disciplinary action, up to and including termination. If you experience any forms of retaliation, please report it immediately through the Compliance Hotline or Website, Compliance (complianceofficer@staar.com), or Human Resources representative.

9. ENFORCEMENT

Failure to comply with this Policy may subject the Company Personnel to disciplinary action by the Company, including dismissal for cause, whether or not the person's failure to comply results in a violation of ABAC Laws. In addition, violations of ABAC Laws can lead to fines, punishment, or other penalties from enforcement authorities.

10. GENERAL

10.1 Company Personnel will be subject to periodic training and education on this Policy. Managers must confirm that their personnel timely complete annual compliance training and are alert to potential signs of bribery and corruption, particularly when doing business with or through Foreign Agents. Any questions about this Policy or the requirements of applicable laws should be directed to the Office of General Counsel.

10.2 This Policy shall be reviewed periodically by the Company's Board of Directors, and any substantive changes hereto shall be subject to approval by the Board of Directors.