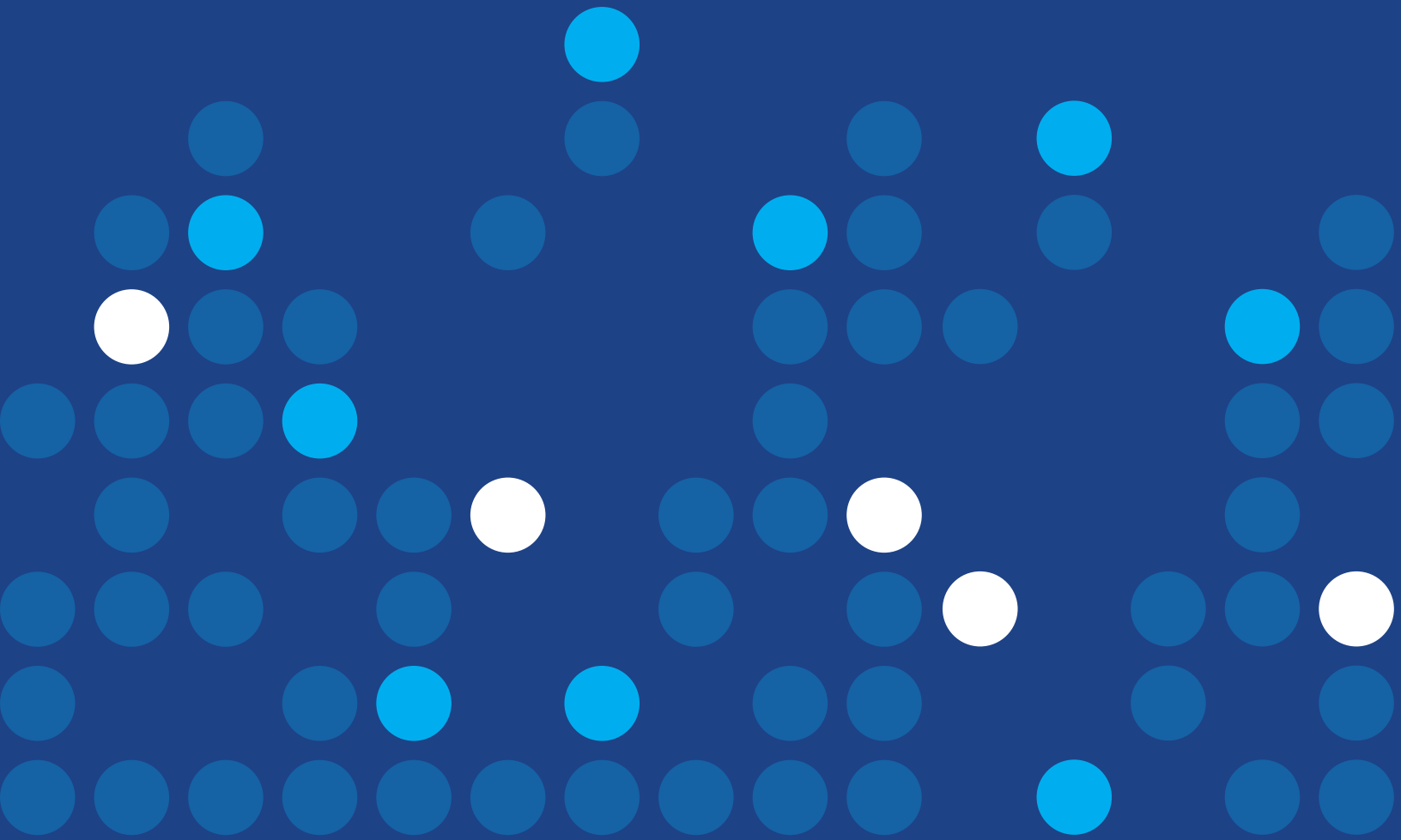


# Code of Business Conduct

Trust • Integrity • Accountability





# Code of Business Conduct



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# Message from the CEO

## Building Trust through Integrity



*"Our success depends on maintaining the trust of our stakeholders. No amount of progress can come at the expense of our company values or integrity."*

It is a privilege to lead Alcon as the company enters a new chapter of independence in developing solutions for eye health. What we do is critical to help people see better; how we do it helps us earn trust with our customers, investors, co-workers, and other company stakeholders. Our success depends on maintaining this trust.

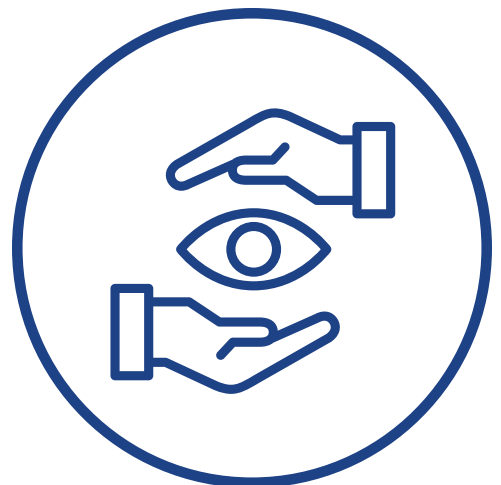
We all must embrace our company values and culture of integrity. I am committed to conducting business in alignment with the expectations stated in this Code of Business Conduct. I expect the same commitment from each of you. No amount of progress can come at the expense of our company values or integrity.

I expect you to understand this Code, ask questions if something is unclear, and be accountable for your actions and decisions.

Guided by this Code, let's do our best work. Demonstrate your integrity and accountability as we collaborate to protect and restore vision. Our ultimate customers, the millions of patients and consumers we serve, deserve no less.

A handwritten signature in black ink, consisting of a stylized 'A' followed by a series of loops and a long horizontal stroke.

David J. Endicott  
Chief Executive Officer



# Trust Matters and it Begins with You

This Code of Business Conduct (“Code”) defines what we stand for and how we conduct our business. We expect all associates and Alcon’s Board of Directors to follow the Code.

Building a strong company culture that promotes trust is a shared responsibility. Our reputation for acting ethically and responsibly is based on the decisions each of us make, every day.

We must work together to earn and maintain the trust of our stakeholders: patients and consumers, healthcare professionals who use our products and services, other business partners, our investors, regulatory agencies, and our Alcon colleagues.

Why is this important? Because people do business with companies, and individuals, they can count on and trust. We are committed to being that kind of company. The individual and collective decisions we make can earn or break the trust of our stakeholders.

We create risks when we break trust, including:

- Harm to people
- Reputational or financial harm to Alcon
- Adverse legal consequences, including fines and penalties, and
- Inability to recruit and retain talented employees.

We must avoid these risks so we can focus all our resources on accomplishing our mission of helping people see better. How do we do this? By remaining committed to acting with integrity in the workplace, in the marketplace, and in society. This includes complying with the laws of all countries in which we operate.

## **Alcon expects you to:**

- Demonstrate integrity and respect for others, consistently following our Values and Behaviors
- Be accountable for meeting the expectations of this Code
- Follow all applicable laws and industry codes
- Follow Alcon policies and procedures that apply to your work, including any stricter local requirements
- Ask questions when you need help
- Speak up to report suspected violations of this Code, and
- Support our company’s commitment to being an ethical global citizen.

## **Alcon also expects its leaders to reinforce this Code and inspire others by:**

- Demonstrating and demanding ethical decision-making
- Being open and approachable so that associates feel comfortable speaking up
- Listening carefully and handling concerns with sensitivity, and
- Seeking help to resolve issues when they arise, including escalating issues when appropriate.

As you conduct Alcon business, use this Code as your ethical compass. Our stakeholders, including the patients and consumers who ultimately benefit from our products, are counting on each one of us to do this.

*What you do, and how you do it, makes a difference.*

# Our Culture of Integrity

It all begins with our culture. Our values and behaviors unite us globally in a shared commitment to an integrity-based culture. They serve as our ethical foundation to engage in business interactions that build trust. Displayed below are the fundamental company values to which we expect you to align your actions.



# We Build Trust by Speaking Up

## Speak up to ask questions

We want you to speak up and to get help when you need it. Ask questions when something is not clear, whether it is a job expectation, an assignment, or how to apply this Code or a policy. Sometimes the best you can do is identify a question and request assistance. It is okay not to have all of the answers; it is your responsibility to ask questions and seek help. You are not alone; there are resources to support you.

You should also take time to be thoughtful and ask yourself questions before taking action:

- Is the action consistent with the letter and spirit of the law and this Code?
- Would this action help Alcon maintain the trust of its stakeholders?
- Could the action cause any harm?
- Could the action somehow embarrass Alcon or damage Alcon's reputation or credibility?
- Could the action reflect poorly on you and your personal integrity?

## Speak up to raise concerns

If something does not seem right or you have a concern, the company wants to know about it right away. That way, if there is a problem, the company can address the situation quickly and appropriately to prevent harm or keep the issue from getting worse. Trust your instincts. We expect you to speak up promptly when you have a question or a concern, especially when you are aware of or suspect something that could be a violation of the law, this Code, or company policies.

## What does the company expect from you when you raise concerns?

When you raise concerns, or are asked for information by the company, we expect you to demonstrate integrity by:

- Providing truthful information in good faith, even if you do not have all of the details
- Maintaining confidentiality, and
- Cooperating fully.

Speaking up in good faith does not mean you have to be right, but you must believe the information you provide is truthful.

*To be successful in fulfilling our mission, we must earn and maintain the trust of all company stakeholders. To accomplish this, we expect you to speak up.*



## What can you expect from the company when you raise concerns?

When you raise any concern about unethical or inappropriate behavior, you can expect a process that respects and protects you, and includes:

- An opportunity to report in a confidential manner and, if permitted, anonymously
- An opportunity to be heard and taken seriously
- A thorough review and/or investigation of your concern, and
- Opportunities for follow-up.

## Zero tolerance for retaliation

We do not tolerate retaliation in any form against anyone who speaks up in good faith, participates in an investigation, or files a complaint or report. All Alcon managers are responsible for taking appropriate steps to prevent retaliation in their areas of responsibility. Any retaliation, whether direct or indirect, against those who speak up is grounds for discipline.

## How to speak up

When you have questions or concerns, we encourage you to speak to your manager, to the extent you are comfortable. You are also welcome to reach out to one of the following resources:

- Any other member of management
- A member of the Human Resources department
- An Integrity & Compliance representative
- A member of the Alcon legal department, or
- The Ethics Helpline (telephone or web-based; see details below)

When you speak up, you are demonstrating our value of courage and you are helping Alcon operate its business with integrity.

## How do I speak up using the Ethics Helpline?

The Alcon Ethics Helpline is an independently managed, secure, and confidential online and telephone service available 24 hours a day, 7 days a week, in multiple languages. Concerns may be reported anonymously through the Helpline, where allowed under local law. See [Alcon.Ethicspoint.com](https://Alcon.Ethicspoint.com).

### INTEGRITY IN ACTION – *Reporting a Concern*

**Q:** Is protection from retaliation only available if I report my concerns through the Helpline?

**A:** No matter how you report your concern, retaliation is unacceptable. If you believe you have been retaliated against for reporting a concern, or have been threatened with retaliation, contact a member of the Human Resources or Integrity and Compliance department.



# Building Trust in the Workplace

We build trust and succeed together. Respect for each other in the workplace, combined with our commitment to following our values, this Code, and company policies, is a powerful foundation for achieving our collective goals.

## We Build Trust by...

- Having a respectful work environment
- Providing a safe work environment
- Managing conflicts of interest appropriately
- Managing information and resources properly



# We Build Trust with a Respectful Work Environment

## Show respect for all

At Alcon, we treat others with respect and dignity, we encourage diversity, we welcome a wide range of ideas and perspectives, we provide equal opportunity for all, and we promote an inclusive culture. We value one another's contributions as well as the strengths that come from our differences.

Alcon expects you to be respectful, act professionally, and demonstrate courtesy, consideration, and sensitivity to the dignity and values of others when interacting with colleagues, guests, business partners, customers, government representatives, and other Alcon business contacts. This is true regardless of where the interactions occur (for example, at Alcon facilities, customer or vendor offices, business trip destinations, or work related social events).

## No improper conduct

We expect our work environment to be free of improper conduct; physical or verbal harassment or mistreatment in any form is

unacceptable. Similarly, Alcon will not tolerate any harassing or other improper conduct directed at its associates by others with whom the company does business.

## Fair treatment

We are committed to treating associates and job applicants fairly. It is our policy that skills, qualifications, and other job-related and business criteria are the basis for all employment-related decisions (including hiring, promotion, termination, compensation and benefits, and access to training, development, and transfer). We are an equal opportunity employer. We provide a workplace that is free from discrimination related to age, race, color, ancestry, ethnicity, nationality, pregnancy, sexual orientation, gender or gender identity, characteristics, or expression, genetic information, disability (mental or physical), marital or domestic partnership status, political belief, creed, religion, veteran or military status, and any other status or characteristic protected by law.

## INTEGRITY IN ACTION – *Improper Conduct*

**Q:** One of my co-workers often makes jokes about another associate in our group and this seems to make the associate feel uncomfortable. What, if anything, should I do about it?

**A:** Making rude jokes or comments to or about someone in the workplace is not acceptable. What may seem acceptable, amusing, or a common stereotype to one person may be unwelcome, abusive, or offensive to another.

You should speak to your co-worker about stopping this inappropriate behavior if you are comfortable doing so, speak to your manager, or report the matter consistent with our speak-up process so it may be addressed appropriately.

# We Build Trust with a Safe Work Environment

We are committed to providing a healthy and physically safe work environment for our associates and visitors.

## Health and safety

We continually assess the health and safety impact and risks associated with our business activities. Our health and safety policies and procedures are designed to help people work safely and prevent injuries. Regardless of your role or work area, we expect you to:

- Know and follow the health and safety requirements that apply to your job,
- Conduct yourself in a manner that promotes and protects your own health and safety, and that of your co-workers and guests, whether you are conducting business in the workplace, at an Alcon facility, in the marketplace, or on the roadways, and
- Speak up promptly about any accident or personal injury and any situation or condition that poses a potential safety threat (for example, a request to do a task you consider unsafe, or suspicion that any equipment, tool, and/or vehicle is not operating appropriately and may be unsafe).

We maintain a drug-free workplace at all locations. You are expected to comply at all times with company policies regarding use or possession of drugs or alcohol.

## Security

We take proactive precautions at our facilities to minimize security risks to associates and visitors. Violence and threats of violence are not acceptable in the workplace.

You must not possess or use firearms or other weapons while conducting Alcon business and while on Alcon-owned or leased property, unless specifically authorized under applicable local law and local company policy. This prohibition applies even if you are licensed to carry a firearm.

You are expected to report promptly to the company any security concerns, including actual or threats of violence in the workplace.

*We expect our work environment to be safe, respectful, and free of improper conduct. Simply put, we expect and insist that our associates are both respected and respectful.*

## INTEGRITY IN ACTION – Safety Concern

**Q:** I am aware of a condition that may present a safety hazard. Should I report it?

**A:** Yes, protecting health, safety, and the environment is something for which we are all responsible. You should report the issue right away before someone gets hurt.

# We Build Trust by Managing Conflicts of Interest Appropriately

You must conduct Alcon business dealings ethically, fairly, and in the best interest of Alcon. A conflict of interest exists whenever your personal interests or relationships conflict, or may appear to conflict, with Alcon's business interests. You must not engage in activities that present conflicts of interest.

When you encounter a situation that presents a possible conflict of interest, you must either avoid or decline the opportunity, or follow the Alcon conflict of interest disclosure process. After you disclose the situation to the company, your manager will advise you of the appropriate action. In some cases, the action may be permitted, with conditions.

The following are examples of actual or potential conflicts of interest that require company evaluation:

**Outside business interests** you or your spouse, domestic partner, or immediate family member has that may conflict with Alcon interests, such as:

- Owning, participating in (for example, as an officer, member of a board of directors, or a consultant), or being employed by another company that does, or seeks to do the following:
  - Compete with Alcon
  - Buy goods or services or receive grants or donations from Alcon
  - Supply goods or services to Alcon
  - Distribute our products
  - Enter into a joint venture or another type of business partnership with Alcon

- Personal financial interests or prospective investments that could be significant enough to pose a conflict with independent business judgments you make for Alcon (e.g., investments in a customer, competitor, supplier, distributor, or business partner, or in opportunities learned of through Alcon),
- Accepting other outside responsibilities that interfere with your ability to perform your job at Alcon.

**Accepting or soliciting anything of any material value for personal benefit** (such as payments, gifts, travel, entertainment, favors, or personal services) from another company that has any tie to Alcon or Alcon business interests. There is no conflict of interest if the thing of value is generally available to all Alcon associates.

**Any close personal relationship** with a business partner, customer, competitor, or colleague whose career advancement, compensation, or other term or condition of employment you have the ability to influence.

**Use of Alcon assets (both physical and intangible) for inappropriate purposes**, such as for personal business gain or the benefit of family and friends, political purposes, or to benefit or solicit for charitable organizations or endeavors not initiated by Alcon. You may use Alcon resources for incidental personal use only if this does not interfere with company business, your job performance or that of others, and does not violate restrictions in this Code or a company policy.



## INTEGRITY IN ACTION – *Conflicts of Interest*

**Q:** I received an invitation to join the Board of Directors of a charitable institution to which Alcon donates products from time to time. Do I need to seek approval from someone at the company before I accept this position?

**A:** Yes, you must seek company review of this situation through the Conflicts of Interest process. Sometimes, serving on the Board of another company presents conflicts. If the company approves the role, there may be certain conditions associated with the approval.

# We Build Trust by Managing Information and Resources Properly

## Use of company resources

Alcon provides you with the resources you need to do your job, including company information, information technology systems, funds, and physical assets. You must use company resources appropriately for Alcon business purposes, and obtain appropriate company authorization for expenditures or other transactions where required.

You are expected to report promptly to the company any theft of or damage to company assets.

If you are involved in contracting for Alcon, you must follow applicable company processes and verify contract provisions accurately reflect the nature, value, and content of the proposed transactions and relationships.

## Confidential information

Our business success depends in part on the appropriate protection and use of confidential information. Confidential information is information that is not currently known or generally available to the public. It may be information owned by or relating to Alcon, or other organizations or individuals.

Examples of Alcon confidential information include (but are not limited to): research information, product design details, manufacturing methods, non-public financial results, business plans and strategies, potential licensing and acquisition agreements, and

legal memoranda and advice. From time to time, Alcon is also entrusted with confidential information that belongs to third parties.

To safeguard confidential information:

- Never disclose confidential information to anyone not authorized to receive it, whether inside or outside of Alcon
- Use sound, professional judgment to determine whether information is confidential; consult a supervisor or company lawyer if there is any doubt about whether information is confidential in nature
- Mark and handle confidential information appropriately given its categorization
- Protect confidential information against risks of theft, loss, misuse, and unauthorized modification or disclosure
- When creating or modifying information, verify the accuracy of any resulting company records
- Do not discuss confidential information in places where the conversation may be overheard and do not display it in areas that could allow inappropriate access (for example, in public areas at Alcon facilities, airports, airplanes, restaurants, lobbies, elevators, and restrooms), and
- Report promptly any information security incidents to Alcon information technology security associates.



### Third party information

You must likewise respect the intellectual property rights and confidential information of third parties by:

- Not obtaining confidential information of third parties by improper means (including from individuals under an obligation of confidentiality, such as consultants, vendors, or current or former employees of the third party), and
- Not using materials of external parties in a manner inconsistent with the rules governing intellectual property rights, including copyrights.

### Disclosures

Consult a member of the legal department if you have a business need to disclose confidential information. A confidentiality agreement may be required, with a signature from the third party and approval from a member of the legal department.

Special company approval processes also apply to disclosures that will be made:

- Involving private personal information
- In a forum accessible by the public, such as in scientific publications, financial disclosures, presentations at conferences, press releases, and social media, or
- To government authorities.

Consult with a member of the legal department if you have questions about the proper process.

### Inventions

Inventions you make using Alcon information and assets are Alcon's property. You must submit details about inventions and ideas you make on behalf of Alcon to the legal department

for study and review and cooperate fully in protecting these company assets. The company decides whether to obtain patents or maintain them as trade secrets.

### Data protection/privacy

Another way we build trust is by properly using and protecting confidential personal information entrusted to us by patients, consumers, healthcare professionals, other customers and business partners, and associates. Individuals who provide us with their personal information depend on Alcon to protect their data and privacy; we must honor their trust.

If information could identify an individual, either independently or when used in combination with other information within Alcon's control, you must collect, use, store, handle, and disclose it only with appropriate notice or consent and in accordance with the company's detailed privacy and data protection policies (global and local). Direct any questions to your manager or to Alcon Legal.

#### **INTEGRITY IN ACTION – Confidential Information**

**Q:** I am leaving Alcon to accept a new role at another company. Do my confidentiality obligations continue after I leave the company?

**A:** Yes, the obligation to protect confidential information continues. When your Alcon employment ends, you must not use, retain, or disclose confidential or proprietary information you obtained or learned of while working at Alcon, even if you created it.



# Building Trust in the Marketplace

Another way we build trust is through our interactions with others in the marketplace. We are committed to acting with integrity and dealing fairly in all of our business activities in the marketplace, consistent with the expectations of this Code.

## We Build Trust Through...

- Quality products
- Responsible record-keeping and reporting
- Ethical interactions
- Ethical transactions

*We are a company  
driven by innovation.*



# We Build Trust with Quality Products

From research and invention, to development, to manufacturing and distribution of our products, we are committed to providing products that are safe and effective and to complying with all related legal requirements and company policies designed to support quality and safety.

## Research, development, and product approval

Alcon has built a strong culture of innovation based on integrity and safety. Alcon follows established ethical and scientific standards as it conducts research to address relevant medical, scientific, technical, health economic, or other product needs and questions, or to inform business strategy. The goal of Alcon research is always to enhance eye care by improving our products or addressing unmet needs. Alcon respects and protects the rights, safety, and well-being of humans and animals, and safeguards the integrity and validity of research data obtained.

If you are involved in laboratory, development, or clinical research, you must follow all applicable Good Laboratory Practices, Good Clinical Practices, and related company policies and requirements established by the Research and Development function. When required, we disclose publicly the results of clinical research conducted by Alcon in an accurate, objective, and balanced manner, to enable customers to make informed decisions about our products.

## Product manufacturing and quality

Consistent with our commitment to patients and consumers, we are dedicated to manufacturing and distributing safe and effective products that meet the highest standards of quality. We adhere rigorously to regulatory requirements and our quality system. If you work in manufacturing, you must follow Good Manufacturing Practices, meet the industry quality regulations and standards reflected in our quality policies and procedures, and meet all company expectations communicated to you in training.

## Adverse events and product complaints

Since patient and consumer safety is paramount, whenever you become aware of adverse events or product complaints related to our products, you must report this information in a timely manner through the processes outlined in applicable company policies and procedures. This is true throughout the product life-cycle, whether the product is undergoing clinical evaluation or is already approved for marketing.

## Product security

Alcon exercises great caution in how it packages and distributes its products, with a view to preventing any product tampering, counterfeiting, or diversion. You are expected to report any knowledge or suspicion about activity that indicates the possibility of product tampering or counterfeiting, or inappropriate product distribution.

## INTEGRITY IN ACTION – Product quality

**Q:** We have a very tight deadline to meet for a product delivery and we could speed things up if we work around our safety requirements. Is this ok?

**A:** No, you should never skip any step in a manufacturing process no matter how tight the deadline. Manufacturing process requirements, including those that pertain to safety, should never be compromised. You must follow all company processes on which you have been trained and report any deviations. You are also welcome to speak to your manager about options for future process improvements.

# We Build Trust Through Responsible Record-Keeping and Reporting

As a publicly traded company, we have a duty to maintain books and records that reflect our financial position and our business transactions accurately and completely. The integrity of our books and records is also essential for successful and effective management of the company.

## Accuracy in books and records

As we operate globally, our company books and records must reflect company transactions in a timely manner that is accurate, complete, and understandable. These documents must comply with applicable external legal and accounting requirements as well as Alcon internal policies no matter where the transactions occur.

When creating and managing documents as part of your work at Alcon, you must:

- Follow applicable company procedures for making entries and corrections in company books and records
- Properly record and submit expense reports that are accurate and timely
- Not pay, seek reimbursement, or approve expenditures that lack adequate description or documentation, are not for legitimate services, are inconsistent with the related contract, or otherwise appear to be improper, and
- Not make, arrange to have made, or fail to correct or report any false, misleading, or artificial entries, or disguise information in books or records or records of parties with whom Alcon does business.

## Records retention

You must retain official company records for the time period required by Alcon's global

records retention policy, and must meet any additional local legal requirements. You must not destroy, alter, delete, or dispose of any documents or records that are requested or required by any government authority or are the subject of any retention instructions from the legal department.

## Public disclosures

We are committed to filing with relevant government authorities, on a timely basis, reports that are accurate, complete, and compliant with applicable regulations. This includes, by way of example, periodic earnings filings made with regulatory authorities and transparency reporting. If you are involved in making these disclosures, you must follow all applicable legal and company requirements.

### **INTEGRITY IN ACTION – *Accurate Reporting***

**Q:** You become aware of a recent sale involving significant, unanticipated increase in consumable product sales to a major customer at quarter-end. You suspect the customer does not actually need this quantity and could return a large quantity of these products in the following quarter. What should you do?

**A:** You should report the situation promptly to the company as outlined in the “speak up” section of this Code. If the customer does return the products, both the customer and sales personnel may have received unjust financial benefits in the form of volume-based sales rebates or commissions, which could be considered fraudulent. This would also result in a misstatement of revenue and receivables in Alcon financial statements filed with securities authorities, which if material, could lead to government fines or penalties for Alcon.



# We Build Trust Through Ethical Interactions

## Customer interactions and other professional practices

We are committed to conducting our customer interactions and other professional practices responsibly and with integrity. Because we work in a highly regulated industry, it is important for you to keep in mind certain core principles to guide your actions in the marketplace. Before acting, ask yourself these questions:

- Are you putting patients and consumers first?
- Are you acting with clear and proper purpose?
- Are you engaging appropriately?
- Are you researching for the right reason?
- Are you funding and donating responsibly?

In addition, you must follow legal and industry code requirements and company policies that apply to our customer interactions and other professional practices.

## Fair competition

We are committed to competing vigorously in the marketplace in a fair and compliant manner, and to earning our business success on the merits of our products and services, excellent customer service, and competitive prices. This means we:

- Present our products, services, and sales programs in a clear, honest, and forthright manner, and
- Do not engage in or tolerate unfair methods of competition, including unfair or deceptive practices.

## Suppliers and other commercial third parties

We hold our suppliers, distributors, and third parties who are contracted to act on behalf of Alcon to the same high standards of integrity to which we hold ourselves. We expect our suppliers and business partners to uphold the commitments stated in the Alcon Third Party Code of Conduct.

**Before contracting with a third party, you are expected to:**

- Base your selection on the merit, quality of goods or services, and/or professional skills and reputation of the third party, and
- Verify that appropriate provisions are included in the contract to reflect the third party's obligation to comply with the law and relevant Alcon policies.

**In the case of suppliers, you must also:**

- Act in the best interests of Alcon, not allowing any gifts or other personal or family interests to influence your business decisions made on behalf of Alcon, and
- Not attempt to exert inappropriate influence on any employee of an existing or potential supplier.

*We are committed to conducting all of our interactions responsibly and with integrity.*

## Dealing with government officials

In the course of conducting Alcon business, you may interact with regional, national, provincial, state, county, or local government employees or officials. In countries that have a nationalized or public healthcare system, healthcare professionals may be considered government officials.

### We expect you to:

- Initiate contact with government employees or officials on behalf of Alcon only if this is part of your assigned job responsibilities
- Refer inquiries from government employees or officials to the appropriate company contact for response
- Cooperate respectfully with government authorities who regulate our products and business activities
- When submitting Alcon information to government entities or representatives, submit only information that is accurate, complete, and not misleading
- Do nothing that could be regarded as giving or offering an inappropriate inducement or reward for doing business with Alcon or taking a particular action that benefits Alcon, and
- Comply with all applicable ethical standards and legal limitations that apply to interactions with government and public officials (for example, restrictions on offering or providing gifts, meals, travel, entertainment, services, payment, or items of value to government employees, contractors, and agents).

It is your responsibility to consult with your local compliance officer or a company lawyer to determine what law and restrictions apply.

## Speaking externally on behalf of Alcon

Our external communications about Alcon business matters can impact the trust we have built in our company brand and reputation. It is important for us to communicate accurately, clearly and consistently, when we provide information. Only certain associates are authorized to speak externally on our behalf with various audiences, for example, the news media or investors.

You must not communicate externally on behalf of Alcon if it is not part of your job responsibilities. You should refer any external inquiries you receive to the appropriate company contact.

While we support the use of social media, you must use it responsibly and in accordance with company policies when discussing Alcon related topics.

### INTEGRITY IN ACTION -

#### *Speaking on Behalf of Alcon Publicly*

**Q:** I just read a blog post that unfairly criticizes an Alcon product and I know it is not true. Should I post a reply?

**A:** You should not respond to any information published or posted publicly unless you are an authorized company spokesperson. It is important, however, to inform Corporate Communications, so that appropriate follow up action may be considered.

# We Build Trust Through Ethical Transactions

## Anti-bribery

We do not tolerate bribery, or anything that could be perceived as bribery, in any form. Bribery can damage trust and is inconsistent with our commitment to integrity and respect for our stakeholders.

You must not offer, promise, approve, or provide anything of value (for example, a payment, gift, meal, travel, entertainment, loan, service, or donation) improperly to induce or reward business decisions related to Alcon products or services. You may offer and provide business courtesies such as modest meals and nominal items only if they comply with applicable company policies as well as legal requirements, industry codes, and ethical standards that pertain to the proposed recipient. You must also follow Alcon third-party screening processes when required by company procedures.

## Securities trading

From time to time in the course of doing your job, you may learn of certain confidential information regarding Alcon or another company. If this information could impact a reasonable investor's decision to trade in Alcon's or the other company's securities, including stocks and bonds, it is considered material, non-public information.

It is unethical and illegal to buy, sell, trade, or donate securities of any company about which you have knowledge of material, non-public information, or to tip others who might make an investment decision based on this information. Follow all company policies that apply when trading in securities.

## International trade restrictions

We are a global company that engages in international trade every day. If you are involved in international trade transactions, or carry any Alcon products internationally for business purposes, you must meet all applicable laws and company requirements, including detailed trade compliance policies that apply to the following topics:

- **Import and Export Controls** – All Alcon exports (both tangible and intangible) and imports must be properly classified and valued, and must meet all applicable import and export requirements and restrictions. Requirements can vary under local laws, and apply both to transfers between Alcon affiliates as well as to transfers between Alcon and external parties.  
If you plan to hand-carry commercial goods, professional equipment, or other Alcon-related goods while traveling, you may only do so in a manner permitted by law. Obtain advice and prior approval from the Export and Sanctions Trade Compliance staff and the destination affiliate's Trade Compliance Manager.
- **Boycotts** – You must meet company reporting and approval requirements before acting on a request or inquiry relating to a boycott of a country. This is true even if Alcon will not respond to or comply with the boycott request. Direct questions to the Global Trade Compliance staff.



- **Trade Sanctions** – Various governments impose trade restrictions on countries, territories, entities, and individuals. You must verify that transactions are permissible before engaging in or committing to conduct company business with entities or individuals that you know or have reason to believe may be sanctioned, restricted, or debarred by a government. This is true for all types of Alcon transactions (e.g., research, manufacturing, purchases from suppliers, sales of company products, grants or donations, business travel, financial transactions, etc.) All activities and transactions involving sanctioned territories or parties must have prior written approval from Alcon’s Global Trade Compliance staff. You must follow relevant third party screening procedures when applicable.

### **INTEGRITY IN ACTION – *Trade Compliance***

- Q:** I am traveling to another country to fix a customer’s surgical system and forgot to ship the part. I do not know if I need an export license and it could take several weeks to get one. The customer needs the equipment repaired promptly to perform surgeries. It would save time and money if I just took the part with me and sort out the paperwork afterwards. Is this ok?
- A:** We must always follow import and export legal requirements because breaching these laws could expose us to serious risk, including possible fines and penalties. Check with Global Trade Compliance staff to determine the most efficient way to handle this situation.

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### **INTEGRITY IN ACTION – *Insider Information***

- Q:** I work at an Alcon manufacturing facility where we are greatly expanding our production line for a particular product. A friend of mine heard about the building project and asked me what will be built on the new line. Is it okay for me to tell her?
- A:** If this information is not already publicly known, it is not okay to respond to your friend’s question. If you are not sure it is public, check with a company lawyer.



# Building Trust in Society

Our commitment to building trust through integrity includes being an ethical global citizen. We are committed to engaging with society and the communities we serve in a way that meets societal expectations and serves the greater good.

## We Build Trust by...

- Being an ethical global citizen
- Administering our Code responsibly



# We Build Trust by Being an Ethical Global Citizen

We serve the greater good, and make a difference in our communities.

## Charitable giving and community support

We are proud of our longstanding tradition of helping to meet unmet medical and community needs. Through foundations and other channels, we contribute money and Alcon products to legitimate organizations for charitable purposes aligned with our giving strategy, and support legitimate community activities where we have a business presence. We also provide disaster and humanitarian relief as needed to address emergency needs, and organize opportunities for employees to volunteer their time to help community organizations. Acknowledging our social responsibility through thoughtful giving and active community engagement reflects our unwavering commitment to support people and communities.

## Environmental sustainability

At Alcon, we strive to minimize the environmental impact of our business activities by adopting responsible policies, procedures, and practices that promote efficient use of resources and protect the environment. We install, maintain, and

monitor environmental controls to keep our facility emissions within legal limits. We also continually assess the environmental risks and impact of our existing as well as new business activities, such as designing a new product, engaging in a new market, remodeling facilities, building a new process, or acquiring a business.

Throughout the product life cycle, from product inception and design, through production and distribution, we are committed to:

- Conserving natural resources
- Reducing, reusing, and recycling waste and materials
- Reducing greenhouse gas emissions
- Sourcing environmentally friendly material
- Promoting sustainability during new building construction and facility modifications, and
- Complying with all applicable legal requirements that relate to the environment.

As indicated in the Alcon Third Party Code of Conduct, we expect our suppliers to have this same commitment to compliance and environmental sustainability.

*Each year, thousands of dedicated Alcon associates volunteer their time and talents to help our neighbors and strengthen the cities in which we live and work.*



## Fair labor standards

We believe that all people should be treated with dignity and respect, and therefore, we recognize the importance of maintaining and promoting fundamental human rights. We are committed to respecting worker rights, complying with employment and human rights laws, and to preventing any child labor, modern slavery, or human trafficking from occurring in any part of our business operations or supply chain.

## Political financial support and involvement on behalf of Alcon

We believe that being an ethical global citizen includes being involved in the political process. We participate in the political process only through appropriately trained associates who follow designated company processes. Political contributions are tightly controlled by law and are prohibited by some governments. You must not offer, provide, authorize, or arrange for the use of any Alcon funds, property, or associate services to support any candidate for political office, or any political party, official, or committee unless permitted under applicable law and with advanced, written authorization from a company lawyer.



## Political involvement by associates as individuals

We encourage you to participate fully as private citizens in the legitimate political process of your respective countries, states, or other political units. Any individual support you provide for political parties, candidates, events, or causes should be purely voluntary. You may not conduct political activity on company time or property, and you must use your own resources to support the activity. While Alcon encourages you to communicate with your government representatives in your capacity as an individual, you should not engage in these communications on behalf of Alcon unless doing so is part of your Alcon designated job responsibilities.

### **INTEGRITY IN ACTION – *Participation in the Political Process***

**Q:** I personally want to support a local political candidate by hosting a lunch event at Alcon. Can I do this?

**A:** No, you must not use company funds, facilities, or other resources to provide any personal support for a political party or candidate. If the company wants to arrange such an event for business purposes, this may be done only if it is permitted under local law and is authorized in advance and in writing by a company lawyer.

# We Build Trust by Administering Our Code Responsibly

We are committed to operating our business with integrity and our Code is an integral part of helping our associates fulfill this expectation. Our Code is the foundation of Alcon's global integrity and compliance program. It is not a contract and does not convey any specific employment rights or guarantee employment for any specific time. We may amend this Code from time to time with the prior approval of the Alcon Board of Directors. For the most current version of the Code, see the Integrity & Compliance internal website or Alcon.com.

## Related policies

The Code is supported by more specific global, regional, and local company policies and procedures that help the company comply with relevant legal requirements and societal expectations for conducting business ethically. Stricter local requirements, whether based on local law, industry code, or local company requirements, take precedence over what is required under this Code and company policies. In addition, anything stated in this Code and company policies that is stricter than local requirements takes precedence over the local requirements.

### INTEGRITY IN ACTION – Code Requirements

**Q:** Do the requirements to comply with the Code and take Code training apply to everyone at Alcon, regardless of level?

**A:** Yes, these requirements apply equally to all of us.

## Corrective actions and discipline

We are proud of what we do and the expectations we set for ourselves in this Code and related policies. We take violations of these expectations very seriously. Therefore, depending on the nature and severity of the situation, Alcon will take appropriate corrective or disciplinary action, up to and including termination of employment, for:

- Violating this Code, a company policy or procedure, or the law
- Failing to report a known or suspected incident
- Knowingly making a false report
- Refusing to cooperate with an investigation, or
- A manager's intentional disregard of a possible issue, or failure to act appropriately to address a violation or concern.

In addition, in the case of a violation of law, a government agency or a court may impose civil and/or criminal penalties on Alcon and/or on individuals.

## Acknowledgment required

You are expected to complete training on the Code periodically, and will be asked as part of the training, to acknowledge that you have received, read, understand, and will follow the Code expectations. You will also be asked to certify that you have reported to Alcon any actual, potential, or perceived conflicts of interest that exist between your personal interests and the interests of Alcon.





*Remember, trust matters...  
and it begins with you!*

**Alcon**