

Alcon Eye Care UK Limited Labour Standards Assurance System (LSAS) Policy

Alcon Eye Care UK Limited (Alcon) supports eye care professionals and their patients and we believe that our suppliers are critical to our success in meeting our vision “To be the most trusted leader in eye care”. We seek to create genuine partnerships for the benefit of Alcon, our suppliers and, most importantly, the patients who rely on us.

1. Purpose and rationale of this policy

This policy aims to provide clarity to our employees, customers, suppliers, investors and other stakeholders concerning Alcon’s commitment to respecting human rights and labour standards throughout our direct operations (where we respect and promote the Labour Standards Assurance System through our employment policies and practices) and our supply chain.

2. Alcon’s understanding and commitment to Labour Standards

Alcon is committed to respecting all internationally proclaimed human rights. Operating in accordance with the International Bill of Human Rights (the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. The Alcon UK LSAS Policy aims to align with internationally recognised labour standards in relation to:

- Child labour
- Forced/bonded labour
- Non-discrimination
- Non-harassment
- Living wages
- Working hours
- Working conditions
- Freedom of association/collective bargaining

3. Policy scope, responsibilities and Board-level support

This Policy aims to drive compliance across the following two main focus areas of the LSAS:

- 1) The management of Alcon’s suppliers within our supply chains.
Alcon requires its UK suppliers of products, falling within the scope of the LSAS, to adhere to this policy and the Alcon Supplier Code.
- 2) Associates’ awareness and understanding.
Alcon requires all its UK and Ireland associates to adhere to the Alcon Code of Conduct and to complete the awareness training with competency based assessment.

The Alcon LSAS Representatives, supported by the LSAS Project Manager, are responsible for

implementation of this policy. It is supported through approval and sign-off by the Alcon General Manager and Finance Director.

This policy is designed to document the framework of the Labour Standards Assurance System in the UK, and used in conjunction with Alcon's policies and controls, particularly the Supplier Code and the Code of Conduct.

4. Commitment to comply with law and global standards

Alcon is committed to ensuring its operations are compliant with the laws concerning labour and human rights in the countries where we operate. Alcon is also committed to upholding the ILO core labour standards. Where national law imposes more stringent requirements, we will ensure compliance with those requirements while respecting the content of this policy.

5. Expectations of our suppliers

Alcon recognises that our responsibility for human rights and labour conditions encompasses the whole of our supply chain, and it is our goal that working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We encourage all suppliers of products covered by the LSAS to comply with the provisions concerning human rights covered by the standards referenced in this policy.

All suppliers of products within the scope of the LSAS are also expected to adhere to Alcon Ethics and Compliance Standards for Suppliers and Alcon Supplier Code. We will monitor our selected suppliers based on internal risk assessment, audit findings and mitigation activity plans. We reserve the right to terminate supplier relationships where mitigation efforts have not met expected improvements in supplier performance or required compliance.

6. Assurance and verification procedures for the LSAS

The assurance and verification procedures which Alcon has in place to continue to monitor and develop the policy include:

- Supplier self-assessment surveys and verification documentation
- Quality Management System
- Quality Audits
- Supplier Management, Due Diligence Check and Risk Review

7. Communication and training on LSAS policy

This policy will be communicated at regular intervals to our suppliers impacted by the scope of our Labour Standards Assurance System, and published on our UK website. We provide LSAS specific online training to all Alcon staff, which is refreshed yearly.

8. Commitments to addressing significant issues identified as part of the LSAS

Alcon will identify significant labour standards issues of concern affecting products falling under the scope of the LSAS through the Quality Management System, regular Supply Management Meetings, Leadership Risk Review Meetings and the Labour Standards Risk Review Process. Following the identification of any non-conformance or increased risk, we will follow the investigation process and take any necessary action.

9. Promoting ethical conduct

Alcon is committed to promoting ethical conduct and legal compliance with all our associates and throughout our supply chain, including our supplier's contractors worldwide. Alcon aims to foster an environment of open communication where concerns can be expressed freely through the company's BPO Helpline.

10. Commitment to policy review process

Alcon is committed to continually improving its Labour Standards Assurance Management System in line with this policy, and to meeting relevant targets to drive improved performance. The policy will be reviewed on an annual basis to ensure its continuing focus, relevance, and alignment to the legal requirements in the jurisdictions where we operate.

Mike Turner
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Dave Coe
Head of Quality, LSAS Representative

Mike Chaffey
LSAS Deputy Representative