

Alcon Supply Chain and Modern Slavery and Human Trafficking Statement

Introduction

Some jurisdictions have enacted laws that require certain companies to make public statements about their efforts to eliminate slavery and human trafficking. These laws include the UK Modern Slavery Act of 2015, Section 54, Part 6, and the U.S. State of California Transparency in Supply Chains Act of 2010. This statement describes our efforts to address this topic.

We are committed to being a company that is reliable and trustworthy, and to operating our business consistent with the highest standards of ethics and integrity. 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.

Company Overview

Alcon is the largest eye care device company in the world, with over USD 7 billion in sales during the year ended 31 December 2018. Based on its sales for this period, Alcon is the number one company globally in ophthalmic surgical devices and the number two company globally in vision care. Headquartered in Geneva, Switzerland, Alcon has over 70 years of history in the ophthalmic industry, operates in over 70 countries, and serves consumers and patients in over 140 countries.

Alcon researches, develops, manufactures, distributes, and sells a full suite of eye care products within two key businesses: surgical and vision care. The surgical business focuses on ophthalmic products for cataract surgery, vitreoretinal surgery, refractive laser surgery, and glaucoma surgery. Alcon's broad surgical portfolio includes implantable lenses, consumables, and surgical equipment required for these surgeries and supports the end-to-end needs of the ophthalmic surgeon. The vision care business comprises daily disposable, reusable, and color-enhancing contact lenses and a comprehensive portfolio of ocular health products, including products for dry-eye, contact lens care, and ocular allergies, as well as ocular vitamins and redness relievers.

Integrity and Compliance Program

Alcon is committed to conducting its business with integrity and has in place a global ethics and compliance program designed to support legal and ethical conduct and prevent and detect violations of the law and our company policies. Some key elements of our integrity and compliance program include:

- **Policies and training** – Alcon's Code of Business Conduct ("Code") is the foundation of our global compliance program. It sets clear expectations for operating with integrity, consistent with Alcon's values and in compliance with external requirements. The Code defines what we stand for and how we conduct our business. Alcon also has in place more detailed company policies and procedures that guide the daily work of Alcon associates.

Alcon trains all associates on its Code annually. Alcon also provides additional, targeted training for associates on requirements that apply to associates' respective job functions.

- **Monitoring and Auditing** – We monitor and audit our program to assess its effectiveness. We refine our program to address any gaps identified and risks triggered by changes in Alcon business activities and/or changes in external requirements.

Alcon Supply Chain

We engage an extensive network of suppliers worldwide. We expect our suppliers to comply with our Alcon Third Party Code of Conduct, which outlines our expectations for third parties who conduct business with or on behalf of Alcon to operate consistent with the same high standards of integrity to which we hold ourselves. This includes meeting our commitment to conduct business in a socially and environmentally responsible manner. The Third Party Code of Conduct prohibits suppliers from using child labor or forced labor of any kind, including, bonded, indentured or involuntary prison labor or from engaging in any other form of slavery or human trafficking. It also requires fair treatment of supplier's workers. We take these precautions to verify that our suppliers meet these expectations:

- We select suppliers based on their merit and quality of goods or services.
- Before contracting with suppliers, and periodically thereafter, we conduct due diligence on our suppliers through a tiered, risk-based program.
- We verify that appropriate provisions are included in supplier contracts to reflect suppliers' obligation to comply with the law, the Alcon Third Party Code of Conduct, and applicable principles of relevant Alcon policies, and communicate these expectations to our suppliers.
- We require suppliers to provide appropriate training to their employees to fulfill these obligations.
- We rely on audits of supplier activities as they relate to Alcon business, to confirm supplier compliance with contractual commitments, performance and quality standards, and the Alcon Third Party Code of Conduct.

Alcon Ethics Helpline and Reporting – Our associates and suppliers are expected and encouraged to speak up, ask questions to seek guidance or clarification, and report ethical concerns in good faith and without fear of retaliation. The channels available for speaking up include the Alcon Ethics Helpline, an independently managed, secure and confidential online and telephone service available 24 hours a day, 7 days a week, in multiple languages. The Alcon Ethics Helpline is available not only to our associates, but also to third parties, including our suppliers.

We remain committed to supporting human rights and global efforts to eliminate modern slavery and human trafficking.

Signature:



Title: David Endicott, Chief Executive Officer and Member Alcon Board of Directors

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