

Modern Slavery | Supply Chain Statement

2025



About this Statement

This statement addresses the California Transparency in Supply Chains Act (2010), Australia's Modern Slavery Act 2018 (Cth) (Australian MSA), Canada's Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023 (the Act), and the United Kingdom's Modern Slavery Act 2015 (UK MSA). This statement describes our business practices and efforts related to this topic. It covers the reporting period January 1, 2024, to December 31, 2024.

This is a joint statement made on behalf of the Alcon's entities subject to these local regulations, namely: Alcon Laboratories (Australia) Pty Ltd, Alcon Canada Inc., Corporation Ivantis Canada Inc., Alcon Eye Care UK Limited, Alcon Laboratories (U.K) Limited. Unless explicitly stated otherwise, references to "we", "us" and "our" encompass the entire company, including the reporting entities listed above, as well as their owned and controlled entities.

Company Overview

Alcon is the global leader in eye care dedicated to helping people see brilliantly. With over USD 9.8 billion in sales during the year ended 31 December 2024. Alcon is headquartered in Geneva, Switzerland. Founded in Fort Worth, Texas, more than 75 years ago, Alcon has grown to become the largest eye care company in the world. Our team of over 25,000 associates operates in sixty countries, serving customers and patients in 140 countries. We are committed to being a reliable and trustworthy company and to operating our business consistent with the highest standards of ethics and integrity. As a healthcare company, we are committed to promoting the health and well-being of our associates, the people who work in our supply chain, and the patients and consumers who use our products.

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. Our commitment to operating our business with integrity and accountability includes respecting worker rights, complying with employment and human rights laws, and working to prevent any child labor, modern slavery, or human trafficking from occurring in any part of our business operations or supply chain.

Business Structure

Alcon researches, develops, manufactures, distributes, and sells a full suite of eye care products within two key businesses: surgical and vision care. Our surgical portfolio includes technologies and devices for cataract, retinal, refractive surgery, as well as advanced technology intraocular lenses (ATIOLs). We also provide advanced viscoelastic, surgical solutions, surgical packs, and other disposable products for cataract and vitreoretinal surgery. Alcon's broad surgical portfolio includes implantable lenses,

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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.

Our global business structure features management teams aligned under Innovation and R&D, manufacturing, and the two global business franchises (surgical and vision care), all supported by appropriate corporate operations and control functions. Our reporting structure and accountabilities within functions, business units, and geographies, allow visibility and oversight to their respective leaders. Our procurement leadership team has accountability for overseeing procurement and supply chain activities.

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 – 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. "People" are included in our core values and behaviors.

Alcon is committed to treating associates fairly and with respect. The Code includes content emphasizing the need to maintain a respectful work environment by:

- Showing respect for all people
- Treating people fairly and without discrimination
- Not engaging in improper conduct
- Being inclusive and courteous, and
- Not disparaging others or engaging in any physical or verbal harassment of colleagues

The Code includes provisions that affirm Alcon's commitment to maintaining fundamental human rights, including respecting the rights of workers, and Equal Opportunity Employment. We take pride in maintaining a diverse and safe working environment. Our global policies do not permit discrimination in recruiting, hiring, training, promotion, or other employment practices based on race, color, religion, gender, national origin, age, sexual orientation, gender identity, marital or veteran status, disability, membership in an association, or other legally protected subject.

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The Code also emphasizes the importance of complying with company expectations for maintaining a healthy, safe, and secure workplace, as well as Alcon's commitment to building trust through integrity as an ethical global citizen.

Demonstrating our commitment to, and advocacy for, Fair Labor Standards, the Code includes the following statements:

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 preventing any child labor, modern slavery, or human trafficking from occurring in any part of our business operations or supply chain. We respect the rights of employees to associate freely and respect their right to choose collective bargaining.

Our Code further reinforces a general culture of integrity and accountability and requires remedial action for known breaches of the law and/or company policies. Alcon also has in place more detailed company policies and procedures that align with the Code principles to guide the daily work of Alcon associates. The Code includes an expectation that associates speak up whenever they see actions inconsistent with any of the Code expectations.

Find out more about our commitments in our [Global Policy on Human Rights](#).

Training – Alcon trains all associates on its Code annually, and provides additional, targeted training to associates on requirements that apply to their respective job functions, including to those responsible for risk assessment, due diligence, and supplier engagement.

Our 2024 Code training course, completed by 98% of our associates worldwide, requires all associates to verify they have read, understood, and will follow the Code.

In addition, all associates in the United Kingdom received a specific training to enhance their awareness of the UK Modern Slavery Act at the end of 2019. The training included competency-based questions.

Alcon Ethics Helpline, and Reporting

Our associates 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. Clear instructions about this are addressed in our Code. We also offer Alcon associates related annual training and communications. The channels available for speaking up include the Alcon Ethics Helpline, an independently managed, secure, and confidential online and

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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 third-party contractors and suppliers.

Monitoring, and Auditing – We conduct selective, risk-based monitoring and auditing of our compliance program to assess its effectiveness. We continually work to refine our program to address any gaps identified and risks triggered by changes in Alcon business activities and/or changes in external requirements.

For more information on Alcon’s Human Rights Due Diligence initiatives, see page 41 of our Social Impact and Sustainability Report 2024.

Alcon Supply Chain

We engage an extensive network of suppliers worldwide. Our supply chain for surgical and vision care products includes purchasing component parts for manufacturing intricate surgical equipment, contact lenses, and related medicinal products. The highest fair labor standards risk in Alcon’s supply chain relate to the following key materials:

- Electronics, electronic components and circuit boards, IT and telecoms hardware, and surgical instruments or equipment, when sourced (whether directly or indirectly) from certain countries in Asia; and
- Metal raw materials from mines in jurisdictions affected by conflict or with poor labor rights performance or a high prevalence of or vulnerability to modern slavery.

We expect all our suppliers globally to comply with applicable legal requirements and meet Alcon's expectations stated in the Alcon Third Party Code of Conduct. Third Parties are expected to adopt the same broad principles covered in this Code with their own suppliers. This includes meeting our commitment to conducting business in a socially and environmentally responsible manner.

By committing to the Alcon Third Party Code of Conduct, Alcon suppliers agree not to use child labor or forced labor of any kind, including bonded, indentured, or involuntary prison labor. They also agree not to engage in any other form of slavery or human trafficking. The Alcon Third Party Code of Conduct also requires suppliers to treat their workers fairly. We take the following precautions to help 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, conduct screening and targeted, risk-based due diligence assessments of our suppliers to mitigate the

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possibility of risks related to any of the following areas depending on the screening criteria: Anti-Bribery, Animal Welfare, Contractor Safety, Global Trade Compliance, Health, Safety & Environment, Labor Rights (including modern slavery, child labor, human trafficking or other human rights abuses), Quality Management, Clinical Medical Affairs, Scientific & Tech Services and Supplies, Information Protection, Record Management, Data Privacy.

- Over the course of the past couple of years, we reviewed and enhanced our risk-based assessment and due diligence processes across some of these risk areas. We also monitor conflicts minerals risk annually.
- We include appropriate provisions in supplier contracts to reflect suppliers' obligation to comply with the law, the principles of the Alcon Third Party Code of Conduct, and applicable principles of relevant Alcon policies. We require Alcon pre-approval for any sub-contracting.
- We perform risk-based monitoring (both desktop and on-site audits) of supplier activities as they relate to Alcon business to confirm supplier compliance with contractual commitments, performance, and quality standards. In 2024, we continued on-site supplier audits according to plan. 7% of these audits were performed remotely, leveraging video technology to enable visual inspection to supplement document reviews.
- As a publicly traded entity, we report annually to the U.S. Securities and Exchange Commission on our supply chain due diligence in connection with conflict minerals. For more information, refer to our Conflict Minerals Report.

In the UK, Alcon is subject to the UK Labor Standards Assurance System (LSAS) requirements, which mandate supplier due diligence and labor standards for medical suppliers to the UK's National Health Service. In December 2022, Alcon received independent verification that it maintained Level 3 LSAS compliance, indicating that Alcon has a robust system for implementing and maintaining its LSAS program, with evidence that Alcon is addressing defined risks.

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

Consultation

All entities covered by applicable laws have been consulted in the preparation of this statement, providing them with the resulting requirements and Alcon's due diligence practices applicable worldwide. They have been actively involved in validating this statement and

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establishing the actions required to prevent any risk of modern slavery and to ensure a high level of compliance within Alcon's operations and value chain.

This statement has been approved by Alcon Board of Directors and signed by David Endicott, Chief Executive Officer, and Member of Alcon Board of Directors, on behalf of the reporting entities subject to the laws covered by this declaration.

Approved and signed on 7/8/2025

David Endicott
Chief Executive Officer and Member, Alcon Board of Director.

A handwritten signature in blue ink is written over the text "David Endicott". The signature is stylized and appears to be "D. Endicott".