

Modern Slavery Supply Chain Statement

2026

Reporting year: January 1, 2025 – December 31, 2025

About this Statement

This statement addresses the California Transparency in Supply Chains Act of 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, 2025, to December 31, 2025.

This is a joint statement made on behalf of the Alcon entities subject to these local regulations: Alcon Laboratories (Australia) Pty Ltd, including its subsidiary Cylite Pty Ltd. (Australia); Alcon Canada Inc.; Corporation Ivantis Canada Inc.; and Alcon Eye Care UK Limited, including its subsidiary Alcon Laboratories (U.K.) Limited. These reporting entities are direct or indirect subsidiaries within the Alcon group of companies, whose ultimate parent company is Alcon Inc. 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.

Continuous Improvement – Summary Note

Over the past year, Alcon has continued to strengthen its approach to identifying, preventing, and addressing modern slavery risks. This reflects a structured progression toward alignment with OECD Due Diligence Guidelines and evolving regulatory expectations.

Key areas of progress include:

- **Advancement of risk assessment practices** – This statement incorporates the outcomes of a Human Rights Risk Assessment conducted across Alcon's value chain, providing greater transparency on the identification and prioritization of risks, including those related to modern slavery.
- **Enhancement of supplier risk management** – Additional detail has been included on the strengthening of supplier risk evaluation processes, particularly during onboarding. This includes the introduction of a structured assessment approach, incorporating a modern slavery questionnaire to support the early identification and management of potential risks within the supply chain.

Alcon recognizes that addressing modern slavery risks is an ongoing process. These actions represent an important step in building a more robust and systematic human rights due diligence framework, which will continue to evolve over time.

Company Overview

Alcon is the global leader in eye care, dedicated to helping people see brilliantly. In the year ended December 31, 2025, we generated more than USD 10.3 billion in sales. 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, 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.

Our Due Diligence Approach

Embedding Integrity and Compliance into Our Operations

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. Key elements of our due diligence approach 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 respectfully. 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 respect for worker rights 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 status.

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 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.

More information about our commitments is available in our [Global Policy on Human Rights](#).

Risk Identification and Assessment - We conducted a Human Rights Risk Assessment covering our own operations and global supply chain as part of our ongoing human rights due diligence, informed by the UN Guiding Principles on Business and Human Rights and aligned with OECD guidelines. The assessment was also grounded in internationally recognized human rights standards, including the Universal Declaration of Human Rights, the International Labor Organization's Fundamental Principles and Rights at Work, and the UN Global Compact. It aimed to identify and prioritize potential human rights risks, including forced labor and child labor, using a risk-based approach informed by procurement data, country-risk indicators, industry research, and internal stakeholder input, and prioritizing risks based on severity (scope, scale and remediability) and likelihood.

These results provide a structured basis for reviewing and strengthening policies, controls, and governance to further embed human rights considerations into our operational processes and decision-making.

Training and awareness – 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.

In 2025, over 97% of our associates and contractors completed the Code of Business Conduct training, which requires associates to confirm that they have read, understood, and commit to comply with the Code. In addition, a dedicated human rights module was incorporated into the annual training for all associates within our operations.

In addition to the Code of Business Conduct training, all associates in the United Kingdom will receive specific training to enhance their awareness of the UK Modern Slavery Act, scheduled to be rolled out by Q4 2026.

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 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 pages 41 and 42 of our [Social Impact and Sustainability Report 2025](#).

Supply Chain Due Diligence

Supply chain risk profile - 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 risks 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.

These findings were confirmed by the Human Rights Risk Assessment we have completed, which identified the highest risks of forced labor and child labor in the procurement categories of real estate and facilities, IT and telecommunications hardware, healthcare equipment (including metal, glass, plastic, and electronic components) and packaging.

A significant proportion of Alcon's procurement spend relates to suppliers located in Europe, primarily within European Union Member States. A comparatively limited share of total spend is associated with suppliers based in countries identified as presenting an elevated labor rights risk, as defined by the UNICEF Children's Rights in the Workplace Index, including Brazil, Indonesia, Malaysia, Singapore, and the United States of America.

The majority of value creation within the products procured by Alcon's entities takes place at Tier 1 supplier level, where operations are subject to established controls.

Supplier onboarding, screening, and monitoring - 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, we conduct screening and targeted, risk-based due diligence assessments of our suppliers to mitigate the 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.
- We continually review and enhance our risk-based assessment and due diligence processes across key risk areas to reflect evolving risks and regulatory expectations. In 2025, we strengthened our supplier labor

rights risk assessment process by enhancing how potential risks are identified, escalated, and managed through our due diligence workflow. Under the updated approach, suppliers continue to undergo onboarding and initial screening, and any identified labor rights risk triggers an enhanced assessment. Suppliers in scope are required to complete a targeted modern slavery questionnaire and are subject to immediate and ongoing screening against relevant external sources, which informs an overall risk rating and recommended remediation actions where needed.

- 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 subcontracting.
- 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. All critical (Tier 1) suppliers undergo at least one formal review annually and are assessed for compliance with applicable Health Authority regulations, quality standards, and required controls and documentation. These suppliers are subject to our Supply Quality Audit Program, with audit scope and frequency determined through risk-based assessments, and may be audited on a targeted basis where concerns arise. In 2025, we achieved full audit coverage of Tier 1 suppliers, reinforcing rigorous oversight across our supply chain.
- We also monitor conflict minerals risk through an annual assessment of our products to identify the presence and origin of such materials. This process relies on standardized documentation to ensure consistent capture of data, decisions, and procedures related to their sourcing and use.

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](#).

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

Approved and signed on: August 10, 2026



David Endicott

Chief Executive Officer and Member, Alcon Board of Directors