

CALIFORNIA COMPLIANCE PROGRAM DECLARATION

Alcon has established, based on our good faith understanding of the California statutory requirements, a comprehensive compliance program that is materially compliant with the requirements of the California Drug Marketing Practices statute, Cal. Health & Safety Code 119400-119402. As of the date of this declaration, we declare that we comply in all material respects with the comprehensive integrity and compliance program description available on Alcon.com.

Because our company primarily manufactures, distributes, and markets medical devices, our comprehensive compliance program in the United States is designed to comply with the AdvaMed Code of Ethics on Interactions with Health Care Professionals (the "AdvaMed Code"). The AdvaMed Code is a voluntary ethical code established by the medical device industry. While the Advamed Code is substantially equivalent to the Pharmaceutical Research and Manufacturers of America Code on Interactions with Health Care Professionals (the PhRMA Code"), there are some distinctions, including those that related to the unique nature of interactions between medical device companies and health care professionals.

Our program is reasonably designed to prevent and detect violations of the law and our policies and procedures. We have implementing appropriate program elements through our Code of Business Conduct, policies, procedures, communication mechanisms (including the Alcon Ethics Helpline), training, monitoring, auditing, and mechanisms for corrective action, as well as discipline of associates when appropriate. We also have a global head of Integrity & Compliance, and multiple compliance officers and committees, who have oversight of our compliance with medical device industry codes both in the United States and globally.

In addition to the above program elements, we have also established an annual limit of \$2500 per business segment for meals and educational items as the maximum aggregate value that may be provided to healthcare professionals practicing in the State of California. This limit excludes the value of travel to attend Alcon educational and training meetings, examples, educational materials for patients, evaluation units, items used to provide charity care, and fair market value payments for legitimate consulting services.

We recognize that compliance programs must adapt to changing external requirements as well as a company's evolving business and risk management needs. Therefore, we will continue to assess our compliance program annually, and refine the program by implementing compliance program improvements to meet identified needs.

To obtain a copy of this Declaration and/or the Alcon Comprehensive Integrity and Compliance Program description, please call 1-800-253-1462.

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