

ALCON COMPREHENSIVE INTEGRITY AND COMPLIANCE PROGRAM

Our global integrity and compliance program sets clear company expectations for operating our business with integrity, and is designed to support legal and ethical conduct and to prevent and detect violations of the law and company policies. The fundamental elements of this program are:

Oversight

A global integrity and compliance officer and various compliance committees oversee compliance with our program globally. The Board exercises oversight through the Audit and Risk Committee.

Written Policies

Our Code of Business Conduct is the foundation of our program. It defines what we stand for and how we conduct our business. The Code is supported by more detailed functional, regional, and local policies and procedures.

Training

Alcon requires periodic training and education of all employees on obligations under our Code of Business Conduct and provides additional, targeted training on policies according to job functions and business risk.

Internal Lines of Communication

Associates may seek guidance, or submit reports of potential violations of the law, our Code, and company policies, to management, or to members of the human resources, legal, or integrity and compliance departments.

The Alcon Ethics Helpline is also available to associates and others for reporting potential instances of fraud and abuse and other potential violations of the law, our Code, or company policies. The Helpline is an independent, confidential, and secure service available 24 hours a day, 7 days a week. Reports may be submitted by telephone or online at www.Alcon.EthicsPoint.com.

Auditing and Monitoring

Alcon's integrity and compliance program includes ongoing efforts to assess, monitor, and audit compliance with the company's policies and procedures. The nature, extent, and frequency of these activities depend on a variety of risk factors, including previous violations, new regulatory requirements, changes in business practices, and other considerations. Alcon reports results of these activities to relevant local management and corporate governance committees.

Responding to Issues and Violations

While an integrity and compliance program cannot eliminate improper conduct, we have set clear expectations for all associates and agents to comply with our Code of Business Conduct, and applicable laws and company policies. When violations are identified, Alcon imposes discipline on individuals to address inappropriate conduct and deter future violations. We consider and address each situation on a case-by-case basis according to the nature and severity of the violation.

In addition to imposing appropriate disciplinary action, the company also assesses whether a violation may be due in part to gaps in company policies, training, business practices, or other controls. If so, the company is committed to implementing corrective measures to enhance its controls to prevent further violations.

We refine and enhance our program regularly to address any gaps identified as well as new risks triggered by changes in Alcon business activities and/or changes in external requirements.