

Alcon Global Policy on Anti-bribery

1. PURPOSE

Consistent with Alcon's commitment to conducting its business with integrity, the purpose of this policy ("Policy") is to establish company expectations regarding anti-bribery.

2. SCOPE

This Policy applies globally to all Alcon business dealings. Whenever regional or local anti-bribery laws are more stringent than the requirements of this Policy, the more stringent law applies.

3. POLICY

3.1 Bribery is Prohibited

As stated in our Code of Business Conduct, Alcon prohibits bribery or anything that could be perceived as bribery.

- You must never offer, promise, approve, or provide money or anything else of value (e.g. gifts, vacations, travel, entertainment) to exert improper influence over another person's professional obligations. Do nothing that could be regarded as giving or offering an improper inducement or reward for a decision related to Alcon products, services, or business or for a particular action that benefits Alcon. This prohibition applies to interactions with all individuals, whether they work for a private business or represent a government or public entity or organization.
- Bribery is prohibited, no matter who pays it. You must not commit or authorize acts of bribery using Alcon funds or resources or personal funds or resources, or by using third parties.
- You must not accept a bribe, i.e., any money, reward, or anything else of value (e.g. gifts, vacations, travel, entertainment), that could exert improper influence on your Alcon business judgment. Follow the Alcon [Conflicts of Interest disclosure process](#) if you are offered, receive, or have questions about, any offers of financial or other benefit made to you by external parties.

3.2 Interactions with Government and Public Officials

- In addition to the obligations above, when interacting with Government and Public Officials, comply with applicable legal limitations and ethical restrictions. These restrictions may apply to contractual engagements of these individuals and to offers or provision of gifts, meals, travel, entertainment, services, payment, or items of value. In some locations, transparency to their employers may be required.
- Government and Public Officials are individuals who are leaders, officers, employees, contractors, representatives, or agents of any of the following, and close relatives of these individuals (e.g., parents, siblings, spouses, children):
 - Government (local, provincial, or national) ministries, agencies, legislatures, the military, or law enforcement
 - Companies, institutions, or entities owned (in whole or part) or controlled by a government (e.g., government-owned business, hospitals, or universities)
 - Public international organizations (e.g., the United Nations, World Bank, World Health Organization, the International Monetary Fund, International Red Cross, World Bank, International Olympic Committee), or
 - Political parties or candidates for public or political office.

Healthcare Professionals (HCPs) who are employed by the government (e.g., national health care service) or receive payment for services from a government are also considered to be Government and Public Officials (e.g., practice, teach, or consult in a public hospital).

- When interacting with Government and Public Officials, follow all laws and company policies that apply to the interaction.
 - For interactions that do not fall within the normal course of business where controls are already in place, seek advice from legal and government affairs before making payments to or providing any business courtesy or item to a Government or Public Official, to verify that it is permissible under applicable law and ethical codes.
 - Facilitation payments are prohibited, i.e., do not make a payment to secure or expedite a routine government service or action. It is acceptable, however, to pay a fee to a government entity when all of the following conditions are met:
 - It is a published government fee available to all similarly situated parties,
 - Payment is made transparently to the entity and not to an individual government employee, and
 - The payment is accurately recorded in Alcon books and records.
 - Initiate contact with Government and Public Officials on behalf of Alcon only if this is part of your assigned job responsibilities.
 - Alcon authorizes and trains certain associates to communicate on behalf of Alcon with specific external audiences, including various types of Government and Public Officials (e.g., regulatory agencies, tax authorities, ministers of health, etc). Refer inquiries from Government and Public Officials to the appropriate company contact.
 - Cooperate respectfully with government authorities who regulate our products and business activities.

3.3 Interactions With and Engagements of Healthcare Professionals (HCPs) and others

- To further the goal of this Policy to prevent improper influence, follow the additional requirements stated in *The Lens*, Alcon's Global Policy on Professional Practices, which governs interactions with HCPs and other business contacts, whether or not they are Government and Public Officials.
- The Lens includes core principles, policies, and minimum requirements for engaging HCPs, arranging events and professional meetings, funding events organized by third parties, providing travel and meals, providing items of value and products to HCPs, conducting research, engaging in external product communications, and managing company grants, donations, and community support, as well as interactions with patients and consumers.

3.4 Books and Records

As a publicly traded company, we have a duty to shareholders and the public to maintain a system of internal financial controls, and books and records that are accurate, complete, and understandable. You are expected to:

- Follow good record-keeping and good accounting practices, and document Alcon business decisions and transactions consistent with applicable Alcon accounting policies and internal financial controls.
- Record company business transactions accurately, properly, and with reasonable detail, in a manner that fairly reflects the transactions and disposition of Alcon assets, regardless of the value or magnitude.
- Report any false, artificial, or suspicious entries found in company books or records, or in books or records of other persons or companies with whom Alcon does business.
- Retain records for the period designated in company records retention requirements.

It is prohibited for you to do any of the following knowingly:

- Make, arrange, or approve a false entry in company records
- Disguise or create false records
- Omit any relevant entries in company records
- Delete or alter company records without following the appropriate company procedures that apply to that action, and
- Submit, approve, or pay expenses that are excessive, lack adequate description or supporting documentation, or appear to be improper.

3.6 Third Parties

At times, Alcon contracts with third parties (non-Alcon companies and individuals such as agents, consultants, advisers, distributors, and other business partners) to represent Alcon in interactions with other external parties. Third parties who act as Alcon representatives are subject to all applicable Alcon risk screening and due diligence processes, and specific contracting requirements.

In addition, Alcon contracts with any third party considered “in-scope” for anti-bribery risk management under the Global Procedure on Anti-Bribery Risk Management (“Procedure”), must include clauses that obligate the third party, when acting for Alcon, to comply with the law as well as the concepts stated in this Policy and/or similar anti-bribery obligations stated in the Alcon Third Party Code of Conduct. The Procedure outlines additional required clauses.

Prospective merger, acquisition, and joint business venture partners are also subject to anti-bribery due diligence, and appropriate mitigation plans must be developed to address any issues identified.

3.7 Speaking Up is Expected

Violations of this Policy can have serious consequences for Alcon and all individuals involved.

- If you have questions about what laws and/or ethical restrictions apply, it is your responsibility to speak up and seek advice from your local compliance officer and/or a company lawyer.
- You have an obligation to speak up immediately, using any of the options outlined in our Code of Business Conduct, if you observe, become aware, or suspect that bribery may be occurring or that there are inaccuracies in any books or records relating to Alcon business.
- If you own the business relationship with a third party who contracts with Alcon, you must be vigilant regarding the activities of these third parties and speak up immediately if you observe, become aware, or suspect that the third party has committed bribery or plans to commit bribery.

4. References

- Code of Business Conduct
- Third Party Code of Conduct
- The Lens (Global Policy on Professional Practices)
- Global Policy on Contracting
- Global Travel, Expense, and Corporate Card Policy
- Global Procedure on Anti-Bribery Risk Management
- MAL’s (Management Authorization Levels)
- Company accounting policies and procedures