



Alcon



Swiss Non-Financial Matters

2023 REPORT

Introduction

This Non-Financial Matters Report covers the performance and impact of Alcon Inc. in 2023 on non-financial matters pursuant to Art. 964a-c of the Swiss Code of Obligations. As a company of public interest with domicile in Fribourg and corporate headquarters in Geneva, Switzerland, we are required to disclose certain non-financial information, including information that is helpful to the understanding of our business performance, business results, the state of our business and our effects on environmental matters, social issues, employee-related issues, respect for human rights and combating corruption.

Alcon's Board of Directors reviewed and approved this report on March 20, 2024. We also voluntarily engaged the audit firm PricewaterhouseCoopers AG (PwC) to obtain limited assurance on the selected quantitative metrics in this report. This report was prepared in accordance with the accompanying [Basis of Preparation document](#). Unless otherwise stated, we use the same boundary for the consolidated financial statements presented in our 2023 Annual Report as for sustainability main performance indicators. All information contained in this report is based on the best available information as of March 2024, and may contain good faith estimates.

About Alcon

Alcon is the global leader in eye care, dedicated to helping people *See Brilliantly*. With an over 75-year heritage, we are the largest eye care company in the world, with complementary businesses in Surgical and Vision Care. Being a truly global company, we work directly in 56 countries and serve consumers and patients in more than 140 countries. We have a long history of industry firsts, and each year we commit a substantial amount to research and development to meet customer needs and advanced patient demands.

We see a world where treatable, preventable eye health conditions receive the attention they need, regardless of someone's geography, gender, age or socioeconomic status. More than 1 billion people are living with some form of uncorrected vision impairments—90% of those individuals live in low- and middle-income countries.¹ Through training, education programs and partnerships that improve access and affordability, we are bringing eye care to those who need it.

The global ophthalmic surgical and vision care markets are large, dynamic and growing. As the world's population grows and ages, the need for quality eye care is expanding and evolving. We estimate that the size of the eye care markets in which we operate is approximately \$34 billion and is projected to grow mid-single digits per year through 2028.²

Business Model³

Alcon researches, develops, manufactures, distributes and sells a full suite of eye care products within our global Surgical and Vision Care businesses.

Through our Vision Care business, we are one of the largest manufacturers of contact lens and ocular health products. Our portfolio includes a broad range of daily disposable, reusable and color-enhancing contact lenses and a comprehensive portfolio of ocular health products for dry eye, glaucoma, contact lens care and ocular allergies. We also offer ocular

vitamins and redness relievers such as eye drops for dry eye and ocular allergies and pharmaceutical drops for certain eye conditions.

Our Surgical business offers one of the industry's most complete lines of ophthalmic surgical products, encompassing implantables, consumables, equipment and accessories for use in surgical procedures to address cataracts, vitreoretinal disorders, refractive errors and glaucoma. Our portfolio includes equipment, instrumentation and diagnostics, intraocular lenses (IOLs) and glaucoma devices, as well as a broad line of consumables, including ophthalmic viscosurgical devices, surgical solutions, incisional instruments, surgical custom packs and other products to treat cataracts and refractive errors, such as presbyopia and astigmatism. We also develop specific products to match the needs of different customer segments. Premium-tier and mid-tier surgical consoles, for example, can be manufactured and sold at various price points in different markets.

Product Development

At our core, Alcon is an innovation company rooted in our deep understanding of our customers' needs. Alcon has one of the industry's largest Research and Development commitments and is supported by more than 1,800 R&D associates with expertise in areas like optics, material science, chemistry, software, hardware, manufacturing and technical operations. New projects originate from concepts developed internally by staff scientists and engineers or from external ideas from eye care professionals or strategic partnerships with academic institutions or other companies.

Marketing and Sales

We believe we have the largest global sales and services organizations dedicated to eye care in the world. Our extensive sales and distribution network supports our geographic reach and ability to expand access to critical eye care services.

1. Source: World Health Organization. Blindness and visual impairment. 2022.

2. Source: MarketScope, GfK and Alcon internal estimates.

3. More information on our products and business model is available in Portfolio Update section and Item 4: Information on the Company of our 2023 Annual Report here: https://s1.q4cdn.com/963204942/files/doc_earnings/2023/q4/supplemental-info/2023-Annual-Report.pdf.

Our direct-to-customer and distribution methods differ across business lines. Surgical products are sold directly to hospitals and ambulatory surgical centers. We sell through distributors where we do not have local operations or a scientific office. Our contact lenses can be purchased from eye care professionals, optical chains and large retailers, subject to country regulation. Alcon ocular health products can be found in major drugstores, pharmacies, food stores and mass merchandising and optical retail chains globally.

Manufacturing

Our commercial operations are supported by state-of-the-art manufacturing facilities that are generally organized along product categories. We manufacture about 90% of our products internally, which enables us to manage our environmental impact through efficiency and optimization to reduce emissions, water, waste and chemicals of concern.

Supply Chain and Contracting

Alcon works with 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. We also outsource some tasks and capabilities to third parties. We strive to ensure all business partners operate with the same high standards of integrity and business conduct to which we hold ourselves.

Human Capital

We employ more than 25,000 associates globally. Alcon seeks diverse talent and perspectives that enable our company to deeply understand the diverse needs of our global customer base and contribute to our missions to help people *See Brilliantly*. We focus on the care and growth of associates through learning and development, performance feedback, career progression and a focus on associate engagement—all while ensuring competitive compensation and benefits.

Governance

Alcon is governed by a Board of Directors composed of 10 independent members and our CEO. We strive for diversity among our Board members so that Alcon can benefit from different backgrounds, expertise and perspectives and meet the changing needs of our global business. As of 2023, 36% of our Board members are female. Our organizational structure features management teams aligned under Innovation and R&D, Manufacturing and our Surgical and Vision Care businesses, all supported by appropriate corporate operations and control functions. This organization, as well as our policies and processes, are designed to serve our business, shareholders, associates, partners and communities while promoting accountability across the company.

Risk Management

The Alcon Board of Directors oversees risk identification and mitigation strategies. This is done, for example, through its review and approval of the annual financial statements (Form 20-F) and risk factors therein, Social Impact & Sustainability Report and Swiss Non-Financial Matters Report and through its annual strategic review process. With oversight from the full Board, each Board Committee has a role in the risk oversight matrix, as described in its Charter. The Audit and Risk Committee oversees the compilation of Alcon's top risks and determines how each will be addressed among the full Board and the Board Committees. Beneath the Alcon Board and Committees, Alcon's senior management develops and oversees organizational resources, policies and processes to effectively manage risks.

2023 Financial Performance⁴

- Net Sales: **\$9.4 billion**
- Vision Care Net Sales: **\$4.1 billion**
- Surgical Net Sales: **\$5.3 billion**
- Operating Income: **\$1.0 billion**
- Core Operating Income: **\$1.8 billion**

Social Impact and Sustainability (SIS)

Our SIS strategy leads with our commitment to enable communities to access eye care services so that everyone can *See Brilliantly*:

- **Brilliant Lives:** With our partner organizations, we enable communities to access critical eye care services.
 - Alcon Children's Vision Program screened 30,200 students (prekindergarten through fifth grade).
- **Brilliant Innovation:** Our diverse talent from around the world innovates best-in-class products that change lives.
 - We achieved a Vision Care recall rate of 0% and Surgical recall rate of 0.001%.
 - 100% of facilities, as well as 100% of Tier 1 suppliers, participated in our third party audit programs for manufacturing and product quality.
- **Brilliant Planet:** We care for our planet by focusing on reducing emissions and waste.
 - In 2023, we reduced year-over-year Scope 1 and Scope 2 GHG emissions by 22,527.51 tCO₂e (approximately 8.74%).

SIS Governance

We leverage a robust governance structure and consider SIS objectives throughout our enterprise decision-making process. Leadership starts with Alcon's Board of Directors:

- **Governance and Nomination Committee:** Supports the Board in overseeing environmental management, including climate change and waste, as well as social impact; product access, affordability and pricing; and associate health and safety.
- **Compensation Committee:** Supports the Board in overseeing culture, diversity and inclusion (D&I) and pay equity.
- **Audit and Risk Committee:** Oversees Alcon's overall risk management program.

The Governance and Nomination Committee provides oversight of our overall SIS strategy and reporting. Quantifiable SIS metrics are factored into all Alcon Executive Committee members' incentive compensation.

Our executive Social Impact and Sustainability Steering Committee oversees SIS and is responsible for identifying and managing Alcon's sustainability-related risks. The leaders of our Social Impact and Sustainability Working Group manage initiatives and progress across the business. We have also established operational committees, including a Social Impact Committee, a Global Environmental Sustainability Committee and an Innovation Committee, to provide topic-specific expertise and oversight.

Sustainability Priorities

Regular engagement with associates, suppliers, customers, healthcare providers, industry groups, investors and nonprofit partners is the primary way we identify, assess and prioritize matters of importance. Our overall SIS strategy is informed by our 2022 Social Impact and Sustainability Priority Topic Assessment, which identified what matters most and where we have the most potential to create value aligned with our purpose.

The assessment process, led by a third party, started with a landscape analysis that identified sustainability topics. The topics were generated through a review of industry and sustainability trends, peer company priorities and reporting, and leading frameworks like the Global Reporting Initiative and Sustainability Accounting Standards Board. We then surveyed more than 270 Alcon leaders and associates, suppliers, customers, healthcare providers, industry groups and nonprofit partners to rank the topics and engaged our Board and company leadership to assess each topic's strategic and financial impact on Alcon. In 2023, we reviewed the assessment conducted in 2022, confirming the selection of topics. These were classified according to certain criteria, in particular, importance to stakeholders and business relevance. As a result, the topics described in this report have been identified to be those of most importance to Alcon. Alcon is planning to conduct a new materiality assessment in 2024 to comply with the requirements of the Corporate Sustainability Reporting Directive (CSRD).

Sustainability-Related Risk Management⁵

Alcon primarily evaluates how sustainability-related matters can affect our business through our annual enterprise risk management process. The potential risks we identify are integrated into our business planning, including investments in reducing safety and health risks to our associates and reducing our impact on the environment. We also have dedicated resources to monitor legislative and regulatory developments and emerging issues to anticipate future requirements and undertake policy advocacy when strategically relevant. Outside of our annual enterprise risk management process, we also introduced a SIS Risk Management Committee in 2023. This group meets quarterly to identify, analyze and advise leadership on potential social and environmental risks that could impact the enterprise.

Responsible Value Chain

Alcon's global business partners are required, as part of our Global Master Service Agreement, to comply with our Third Party Code of Conduct, which outlines our expectations for suppliers, distributors, wholesalers, licensors, licensees and other technology and business partners, as well as their agents and subcontractors.⁶ This includes meeting our commitment to conduct business in a socially and environmentally responsible manner. Suppliers are also expected to adopt, with their own suppliers, considerations that broadly cover the same principles. Adherence to the Responsible Business Requirements stated in the Code is one criterion Alcon uses to select and evaluate third parties.

5. Sustainability-related risks are discussed in more detail in the Sustainability Risks and Impacts section below. More information on risks to our business generally is available in the Risk Factors section of our 2023 Annual Report here: https://s1.q4cdn.com/963204942/files/doc_earnings/2023/q4/supplemental-info/2023-Annual-Report.pdf.

6. Find our Purchasing Terms and Conditions here: <https://www.alcon.com/about-us/responsible-business-practice/general-purchasing-conditions> and our Third Party Code of Conduct here: https://www.alcon.com/sites/g/files/rbvwei496/files/2022-06/Alcon_Third_Party_Code_of_Conduct.EN_.pdf.

Sustainability-Related Impacts and Risks

Our business has impacts beyond financial performance that must be managed, including on the environment, our communities, access to eye care and patient safety. Throughout this report, we disclose main performance indicators and discuss the policies, due diligence systems, measures and mechanisms we have in place to manage sustainability-related impacts and risks.

Impacts

Carbon Footprint: Climate change is a global challenge with potentially significant impacts on the health and resilience of our communities. We do not operate in an emissions-intensive industry but recognize our responsibility to reduce our emissions. Our current focus is reducing our Scope 1 and Scope 2 greenhouse gas (GHG) emissions where we have direct operational control.

Waste Generation and Management: Product-related waste is challenging for all companies in the healthcare industry because regulatory bodies often require disposable medical devices and products to protect patient safety and minimize the risk of infection. Addressing this impact starts with the research and development process.

Community Investment: Alcon is a large employer and has a physical presence in many areas where we operate. We recognize our opportunity to have a positive impact through our business, partnerships, Alcon Cares and the Alcon Foundation by supporting the strength and vitality of these communities with resources, time and expertise.

Access to Eye Care: Vision impairments impact more than a billion people worldwide and seriously impede the ability to engage in school, work and society. Many of these impediments can be managed by timely, high-quality care. As an industry leader, we can help expand access to affordable eye care. Through our global capabilities, we demonstrate value and address

cost barriers to make these critical products accessible to patients. We engage with healthcare decision-makers, such as payors, to garner reimbursement and/or funding support. We invest substantial resources in generating data to demonstrate the value of our products in support of access and reimbursement.

Patient Health and Safety: As with all medical devices, the products and ophthalmic surgical equipment we produce carry inherent risks to patients if any of our quality and safety measures are missed. These risks are rigorously managed throughout the product lifecycle.

Employee Well-Being: Our associates dedicate significant time and personal investment to their jobs and Alcon as a whole. The opportunities, compensation and benefits we offer and the culture we create at Alcon directly impact each of their daily lives and well-being.

Associate Health and Safety: As a manufacturing company, we face the risk of workplace accidents. Therefore, safety is always a top priority, especially for our many Manufacturing and Technical Operations (MTO) associates who handle equipment, machinery and materials.

Labor Standards: Our supply chain for includes purchasing component parts for manufacturing intricate surgical equipment, contact lenses and related medicinal products. The materials that carry the highest fair labor standards risks in Alcon's supply chain include electronics, electronic components and circuit boards, IT and telecoms hardware and surgical instruments or equipment, in particular when sourced (whether directly or indirectly) from certain countries in Asia.

Risks

Climate Change: The nature of environmental risks to our business depends on both the physical aspects of climate change as well as market regulations and our ability to understand and respond to rapidly evolving developments. Natural disasters and climatic events could disrupt our operations and those of our suppliers and result in financial and reputational impacts.

Waste Management: We are subject to numerous national and local laws and regulations related to the discharge of regulated materials into the environment, human health and safety, laboratory procedures and hazardous materials and wastes. Our operations involve using and producing hazardous and flammable materials, including chemicals and biological materials. We generally contract with third parties to dispose of hazardous materials and wastes and thus cannot completely eliminate the risk of contamination or injury from these materials. We prohibit sending hazardous waste to landfill and aim to divert all non-hazardous waste generated at manufacturing sites and distribution centers from landfills by 2030.

Supply Chain or Facility Disruptions: Our position as a global manufacturer of medical devices presents risks that can impact our customers directly, as well as affect Alcon's ability to deliver the products patients need. In addition to natural disasters and climatic events, our operations or those of our suppliers could be disrupted by a number of factors, including strikes and other labor disputes, industrial accidents and other occupational health and safety issues.

Supply chain disruptions resulting from global raw material sourcing and manufacturing can lead to availability, quality and safety concerns. We are also sometimes dependent on a single- or limited-source of suppliers for some components, raw materials and production services, such as sterilization. The loss of these suppliers or their inability to deliver at the quality we require could disrupt our operations. As such, we have implemented a global manufacturing strategy to maximize business continuity in case of such events or other unforeseen catastrophic events.

Talent Retention and Attraction: Our associates drive Alcon's success. Failing to create an inclusive culture that fosters creativity, dedication and performance could result in the loss of top talent, hinder innovation and affect our ability to hire. The loss of key members of our organization—including senior members of our scientific and management teams, high-quality research and development specialists and skilled personnel in developing countries—could delay or prevent the achievement of major business objectives.

Anti-Corruption and Anti-Bribery Compliance: Alcon's extensive international operations and sales distribution include countries that are perceived to have heightened levels of public sector corruption. Operating in such areas subjects us to increased scrutiny and has inherent risks.

Environmental Matters

Alcon cares for our planet by engaging teams across the enterprise to reduce emissions and waste generated from our operations and products. Our Global Environmental Sustainability Committee brings together leaders from across the company and is responsible for setting goals and implementing plans to achieve them.

Climate Change

Policies and Concepts

Alcon is committed to becoming carbon neutral by 2030 (Scope 1 and Scope 2 emissions). Our Senior Vice President of Global MTO and Global Head of HSE oversee progress toward this goal in collaboration with our Global Head of Social Impact and Sustainability. We also seek to protect our business from physical risks, including but not limited to climate change, by evaluating the potential impact of related risks and developing mitigation plans.

To govern our efforts, we have adopted a Global HSE Policy⁷ that codifies our commitment to minimizing our operational impact on the environment, as well as procedures and practices that promote the efficient use of resources. We also maintain an internal Energy Management Standard that describes our sustainable management principles for energy and related GHG emissions throughout our company's activities.

Due Diligence Applied

We have embedded an environmental impact assessment into our manufacturing capital investment approval process, recognizing opportunities to address environmental impacts during the planning stage of projects.

Every year, Alcon completes a Scope 1 and Scope 2 GHG emissions inventory, as prescribed by our internal GHG Inventory Management Plan (IMP). Our IMP includes detailed guidance, methodologies and tools to direct data collection and management, emissions quantification and reporting. It also

documents procedures for estimating emissions when primary data is not available. This ensures accuracy, reliability and repeatability.

Additionally, we are working with EcoVadis, a leading provider of global business sustainability ratings, to track our key suppliers' performance. We have also trained Alcon's buyers on using the tool. This integration with suppliers will help us determine Scope 3 emissions. It will also enable us to integrate suppliers' performance into our strategic sourcing process and help us engage and encourage them to reduce energy consumption, emissions and resource use, as well as share best practices.

Measures Adopted and Effectiveness of Measures

Our strategy to achieve carbon neutrality includes reducing energy consumption and transitioning to renewable energy sources. Every year, we continue to implement new energy-saving projects across the company. This includes switching fluorescent bulbs with LEDs, optimizing compressed air consumption, installing insulation sleeves for injection of heating units and replacing old compressors with more efficient models.

In 2023, Alcon Singapore Manufacturing installed rooftop solar panels that generate approximately 7,500 gigajoules of renewable energy for direct site consumption. We also worked with our Texas energy utility company to secure the physical delivery of renewable energy to our Fort Worth and Houston locations. We continue to evaluate renewable energy options for our other operations.

We track these projects' performance individually and review aggregate energy savings and emissions avoidance. As a result of these measures, we achieved an approximately 8.74% decrease in Scope 1 and Scope 2 GHG emissions in 2023 compared to 2022. This continued a more than three-year trend in operational emissions reductions and puts us on track to achieve our Carbon Neutral Goal.

Alcon also looks to minimize our emissions footprint by incorporating sustainability into our product development process. We measure products' emissions intensity and other environmental main performance indicators at each development phase, including the early stage of the R&D phase using our Environmental Sustainability Scorecard (ESS). The ESS helps us identify opportunities to improve and meet demand for more sustainable, resource-efficient products that meet or exceed cost and efficiency expectations. As just one example, the use of the ESS in connection with our Unifeye equipment, resulted in a 25% reduction in GHG emissions per surgery.

Impact and Risk Management

We manage Alcon's potential climate impacts and risks proactively through our Carbon Neutral Goal. Key sites are annually reviewed by our insurance company, including a review of current acute physical risks and mitigation recommendations. The Global Head of HSE receives the final results of these site assessments through a dashboard, which is also shared with each individual HSE site head.

2023 Main Performance Indicators

- Scope 1 GHG Emissions:
75,183 tCO₂e (2022: 73,746 tCO₂e)
- Scope 2 GHG Emissions (Market-Based):
158,299 tCO₂e (2022: 182,264 tCO₂e)
- Year-over-Year Reduction in Scopes 1 and 2 GHG Emissions: **22,527.51 tCO₂e (approximately 8.74%)**

Waste Management

Policies and Concepts

We are committed to diverting 100% of non-hazardous waste generated at manufacturing sites and distribution centers from landfills by 2030. Our Senior Vice President of Global MTO and Global Head of HSE oversee progress toward this goal. Alcon's Global HSE Policy helps minimize our potential contribution to these risks by implementing sound waste management practices and compliance.⁸ Sites are required to implement our internal Waste

Management Policy, which requires them to develop and annually review a Waste Management Plan that contains:

- A waste inventory that describes significant waste streams, characterizes waste (hazardous, non-hazardous, medical, etc.) and details the legal waste code, contractor responsible, disposal route and more
- A waste minimization plan
- On-site waste handling and storage requirements
- Management of waste contractors
- Final disposal of wastes

The Global HSE Policy also prohibits sending hazardous waste to landfills unless required by law. Alcon's internal Waste Management Standard establishes minimum requirements for safe and sustainable waste management programs at our sites and helps ensure that waste is properly stored, treated and disposed of in compliance with federal and local regulations.

Additionally, our Third Party Code of Conduct specifies that business partners must verify the safe handling, storage, recycling, reuse or management of waste.⁹ Waste, air emissions and water discharges with the potential to adversely impact human health or the environment (giving priority to Active Pharmaceutical Ingredients) are appropriately minimized, managed, controlled and/or treated prior to release into the environment.

Due Diligence Applied

As part of our ISO 14001-certified HSE Management system, each site must track and report the type of waste generated and determine the environmental aspects and impacts of its operations. We have also implemented annual internal conformance reviews to evaluate performance and require all manufacturing sites to conduct legal compliance assessments covering environmental management, including waste management and permits, with an external party every three years. Sites must report, investigate the root cause and implement corrective actions

8. Find our global HSE Policy here: <https://www.alcon.com/sites/g/files/rbywei496/files/2019-09/Global-HSE-Policy.pdf>.
9. Find our Third Party Code of Conduct here: https://www.alcon.com/sites/g/files/rbywei496/files/2022-06/Alcon_Third_Party_Code_of_Conduct.EN_.pdf.

needed for identified deviations from compliance with regulations or Alcon's established procedures. The appropriate site and HSE leaders are informed immediately and nonconformances are presented to leadership during the management review process.

We carefully select vendors to transport and dispose of waste. Additionally, as applicable, we assess HSE during our third-party risk assessment process.

Measures Adopted and Effectiveness of Measures

Operational Waste

Alcon's operational waste consists of both hazardous and non-hazardous material, including wastes such as solvents, production-related wastes, expired products and packaging. Our Zero Manufacturing Waste to Landfill guidance document defines the scope and requirements for our sites to minimize or eliminate waste streams. Our waste management hierarchy starts with reduction and prevention, such as the elimination of toxic materials and reduction of non-recyclable materials, followed by reuse and recycling. Sites annually set targets for waste reduction and recycling projects implemented and non-hazardous waste landfill diversion, which are tracked and compared against a baseline. In 2023, our manufacturing sites set out to reduce waste by a combined total of approximately 480 metric tons. We far exceeded this target, achieving a reduction of approximately 935 metric tons by the end of the year.

As a result of these measures, Alcon achieved a 95.9% non-hazardous waste landfill diversion rate through Q3 of 2023. We were the first healthcare company to achieve GreenCircle Zero Waste to Landfill certification for three of our aseptic sites. Additionally, 16 of our manufacturing sites are ISO 14001 certified, demonstrating our rigorous approach to environmental compliance.

Product-Related Waste

We partner with external consultants to conduct lifecycle assessments on specific products to set the baseline for future product development. We are also investigating more efficient ways to reduce packaging waste by eliminating styrofoam, substituting virgin packaging material with recycled material and reusing byproduct where feasible and applicable.

Impact and Risk Management

To manage waste-related impacts and risks, waste generated at Alcon sites is handled, stored, labeled and managed within our locations to reduce the risk of contamination to the environment and communities. We have also developed Standard Operating Procedures that require evaluation and documentation that waste contractors have reviewed pre-treatment and final disposal risks and ensured that environmental impact is minimal. Our sites use Alcon's risk management process to identify HSE risks and implement necessary controls. The results of this process are shared with senior leadership and considered in developing our HSE annual plan and goals. Internal and external audits of this system are facilitated and conducted at the site level.

2023 Main Performance Indicators

- Non-Hazardous Waste Landfill Diversion Rate: **95.9%**¹⁰
- Non-Hazardous Waste Diverted From Disposal (MT): **23,196**
- ISO 14001-Certified Sites: **16**

Social Issues

We are working toward a world where treatable, preventable conditions affecting eye health receive the attention they need. Our two Foundations—Alcon Cares and the Alcon Foundation—provide products, equipment and monetary donations to charitable partners to help increase access to quality eye care around the world. Alcon also continues to work within our business to deliver affordable technologies and prioritize product quality and patient safety.

Social Impact

Policies and Concepts

Alcon strives to have a positive impact on our global communities. Our Social Impact strategy focuses primarily on eye care and secondarily on community investment and encompasses financial support, associate time, expertise and product and equipment donations.

We have set two goals to enable communities to access eye care services so everyone can *See Brilliantly*. These goals are managed by our Social Impact team and Social Impact Committee with oversight of our Global Head of Social Impact and Sustainability. By 2025, our goal is to provide philanthropic support and training programs to help improve vision for at least 5 million people afflicted with untreated cataracts in low- and middle-income countries, including 1 million considered cataract blind. At the same time, our associates will help improve vision and enhance academic success with a goal of conducting at least 150,000 vision screenings for children and ensuring comprehensive care for those in need.

Due Diligence Applied

All donations made by Alcon Cares and the Alcon Foundation are overseen by each foundation's Board of Directors, who use a rubric to evaluate requests.¹¹ This rubric helps the boards allocate resources based on needs and objectives, the organization's financial health, program cost and value, impact, internal evaluation metrics and strategic alignment with the foundations' philanthropic goals.

Alcon's Social Impact team conducts due diligence reviews on existing and potential partners through our donation management system to verify and monitor regulatory and transparency requirements. Organizations are also required to provide program updates and impact reports that enable us to track their performance and determine our collective impact.

Measures Adopted and Effectiveness of Measures

Alcon believes that accessible, quality eye care requires more than money, supplies and equipment. Alcon Cares and the Alcon Foundation partner with US-based organizations dedicated to strengthening the services, systems and talent required of self-sustaining eye health ecosystems in low- and middle-income countries. Some organizations the foundations work with include EYEliance, Mercy Ships and Orbis. Engagements start with an initial discovery meeting to learn about the organization and determine alignment with the foundations' objectives and strategies. Through the duration of the monetary donation, the Social Impact team works alongside partners to develop a strategy and identify additional ways Alcon can provide support.

The Alcon Foundation also allocates a portion of its annual budget to community impact. It supports programs that address homelessness, food insecurity, access to mentoring, education and work readiness and wrap-around services that improve quality of life for underserved populations. Alcon affiliates around the world make charitable donations or direct contributions with review and approval from the Social Impact team. As one example, in 2023, Alcon Grieshaber AG in Schaffhausen, Switzerland, supported go tec!, which works to promote and foster STEM-focused careers by bringing mathematics, information technology, natural sciences and technology classes and activities to local schools.

Additionally, the Social Impact team has worked in recent years to expand Alcon's Children's Vision Program (CVP), helping families in the Fort Worth community overcome barriers to accessible professional eye care. Through CVP, Alcon associates perform vision screenings for students, and the Alcon Children's Vision Center provides comprehensive exams and two sets of glasses to students who do not pass the vision screening. The Alcon Children's Vision Center, funded by the Alcon Foundation, provides comprehensive exams and glasses to students who do not pass the vision screening. Alcon assesses the CVP's effectiveness through our goal to conduct more than 150,000 children's vision screenings. Through CVP, Alcon conducted vision screenings for 30,200 students, prekindergarten through fifth grade, in 2023.¹²

Impact and Risk Management

The Alcon Cares and Alcon Foundation rubrics and screening processes help to identify partner organizations that are in good standing and align with Alcon's values, minimize potential reputational risks and maximize positive social impact. Additionally, the Social Impact and Legal and Compliance teams created comprehensive program guidelines for associate giving. These guidelines highlight the eligibility that a charitable organization or educational institution must meet for Alcon to support them through an Associate Giving Program, such as holding a nonprofit status and refraining from discrimination or restriction of services based on characteristics, such as age, race, national origin, citizenship status, ancestry, gender, gender identity, sexual orientation, disability, veteran status, religion, marital status or domestic partnership status.

2023 Main Performance Indicators

- Students (Prekindergarten through Fifth Grade) Screened Through the Alcon Children's Vision Program: **30,200**

Access, Affordability and Pricing

Policies and Concepts

Alcon is committed to advancing access to eye care by delivering affordable technologies and working closely with healthcare decision-makers to continually improve cost, access and quality of care. Our pricing structure aligns with business priorities. Setting specific pricing, reimbursement and health economics objectives ensures we have evidence-based resources to demonstrate value and support global access to new products and innovations. Standard market access requirements to determine price must be met before a new product is launched. This includes evidence that supports clinical, economic and humanistic requirements, a comparison to other standards of care and total cost of care considerations. We also develop products using inclusive design principles that help meet customers' needs, preferences and budgets.

Our pricing and accessibility efforts are informed by the work of our Market Access team, which tracks performance and collaborates with the R&D, Clinical Research, Marketing and Commercial teams and reports to our Surgical and Vision Care Franchise General Managers. Vision Care and Surgical business leadership makes any decision on pricing that falls outside of our standard guidelines.

Due Diligence Applied

Alcon applies evidence- and value-based pricing to all our products, structuring pricing for product options differently based on the level of product innovation and other factors like market dynamics. Customer input is also sometimes captured on an anonymized basis through market research. This approach expands access to our new, innovative technologies with varying features, benefits and value, all at Alcon's highest standard of quality. We review and revise our "good, better and best" pricing structures annually.

Measures Adopted and Effectiveness of Measures

We collaborate with clinicians and other healthcare decision-makers to expand funding and insurance coverage for our products by sharing economic and clinical outcomes, such as cost-effectiveness studies, quality-of-life research and budget impact models. This serves as evidence of product value to develop reimbursement pathways for patients. We also consider public and private payment mechanisms to make our products affordable.

The Market Access team evaluates our approach and initiatives by tracking price performance in the markets we serve, as well as our reimbursement and funding success rates. In 2023, we launched a new process called Reimbursement Optimization and Initiative (ROI), a strategic internal process connecting our business strategy and desired product claims with main performance indicators such as economic evidence and price determination. This ensures transparency, alignment, collaboration and optimal reimbursement execution. By leveraging this ROI process as a core consideration throughout the R&D stages, we expect to better optimize our market access strategy and execution at the time of product launch.

We are also addressing access barriers through our PD program. Alcon associates work with ophthalmic teaching institutions and faculty to increase the standard of cataract and retinal care in low-to-middle-income countries by training local surgeons on modern phacoemulsification and vitreoretinal procedures. The PD program provides intensive training, combining theory and wet lab surgery experiences using artificial eyes. An experienced surgeon leads the training along with Alcon PD Specialists, who assist participants with surgical equipment training and techniques.

Since the PD program's inception in 2008, surgeons trained in core and advanced phacoemulsification courses have gone on to perform sight-enhancing or -restoring procedures. Alcon tracks each doctor's work after the program to assess the overall reach and impact of the program on patients. As a result of our work in 2023, we enrolled 612 surgeons who have since performed thousands of procedures in these countries.

Impact and Risk Management

To manage access, affordability and pricing-related impacts and risks, we thoroughly review our value propositions for validity and efficacy as part of the product development process. This includes conducting pricing and market research as well as economic research and analyses in the lead-up to product launches to better understand market dynamics and needs. It also helps identify the economic resources and requirements needed to differentiate our products and support various value propositions, including clinical, economic, physician and patient.

2023 Main Performance Indicators

- Number of Surgeons Enrolled in Alcon's PD Program in 2023: **612**

Product Quality and Patient Safety

Policies and Concepts

Product quality and patient safety are two of Alcon's top priorities. We have established a suite of robust policies and standard operating procedures to comply with quality and safety laws and regulations in every country where we distribute our products. For example, we have local policies that detail how we will meet distribution and safety in each region or country. Each of our policies describes our philosophy and expected associate conduct.

To achieve our quality and safety objectives, Alcon has implemented a Quality Management System aligned with the internationally recognized standard, ISO 13485. This system drives our approach, ensuring consistent, compliant execution throughout a product's lifecycle, covering design, evaluation and approval of suppliers and service providers, manufacturing, distribution and post-market quality and safety surveillance.

We comply with all applicable regulations throughout our products' lifecycles. All Alcon products manufactured at our dedicated facilities or by third

parties must comply with current Good Manufacturing Practices. Our new product designs are extensively studied and meet regulatory and legal criteria before being placed into production. Our Quality Management System covers all Alcon R&D centers, affiliates and manufacturing sites and complies with external standards and regulations, such as EN ISO 13485:2016 and EN ISO 14971:2019 for medical devices, United States Food and Drug Administration (US FDA) Code of Federal Regulations (multiple parts), European Union Medical Device Directive EU 93/42/EEC and European Union Medical Device Regulation EU 2017/745. Global health authorities, notified bodies and third-party auditors audit Alcon to verify compliance with these standards and other applicable regulations.

Alcon's Senior Vice President of Global Quality and Regulatory Affairs reports directly to our CEO, ensuring independence of the Quality function and autonomous oversight of product quality and safety. Our Global Quality activities are informed by the work of the Global Medical Safety group, led by our Chief Medical Officer, who monitors emerging concerns and enables the creation of action plans to respond to potential risks.

Due Diligence Applied

Alcon employs several levels of quality monitoring. Our electronic Quality Analytics System monitors key quality and safety metrics at Alcon manufacturing, distribution, R&D and affiliate sites. Site performance is reviewed by management and through regular audits to ensure compliance and achievement of goals. Audits and other feedback mechanisms help us identify and remedy any systemic quality and safety issues within the production process or product design.

Our periodic Quality Management Reviews monitor quality metrics, such as audit and inspection results, post-market surveillance data, product and process conformity metrics, and supplier performance indicators. Alcon's Global Franchise teams and Executive Leadership Team (ELT) participate in these reviews, which result in recommendations for improvement and an assessment of the adequacy and effectiveness of the Quality Management System and risk management measures.

Alcon uses qualified internal warehouses and approved distributors, which we routinely audit, to help ensure product quality and safety. When engaging a new manufacturing or distribution partner, we deploy a series of evaluation, approval and monitoring procedures, including a review of their Quality Management System. Depending on the company and associated risk, Alcon may also perform a technical audit and verify the company's registrations. After approval and before engagement, we establish a comprehensive written agreement that details how each party's manufacturing, distribution, vigilance and other activities will comply with governing regulations. This covers items such as communicating urgent safety issues and collecting post-market reports. We also routinely audit our third-party manufacturing partners for compliance with current Good Manufacturing Practices.

Benchmarking and stakeholder feedback is another core aspect of our due diligence. Should customers have concerns or feedback regarding Alcon products, they can contact us via phone, email or using the NotifEYE portal provided on Alcon.com. Alcon investigates reports of product quality concerns, notifies regulatory authorities where appropriate and evaluates feedback for inclusion in next-generation designs or new products. We have established a formal escalation process through which significant deviations or risks are elevated for review and to determine any actions required.

Measures Adopted and Effectiveness of Measures

Alcon is focused on continually improving our quality processes and systems, launching quality process improvements that simplify, digitize and improve our process over the entire lifecycle. Our Quality team regularly tracks industry trends and global and local regulatory changes, adjusting our processes and procedures as needed. In 2023, we launched DigitEyes to enhance compliance and data integrity and reduce the manual transcripts required to complete product release testing and digitally manage instrument qualifications and analytical test method validations. We also created the Centralized Labeling Lifecycle

Excellence Artwork Review (CLEAR) to simplify Alcon's end-to-end labeling operation model through measures like automating digital applications for greater transparency and input accuracy.

We train our associates to uphold our high safety and quality standards and to monitor the quality performance of our suppliers. Associates receive quality and safety training aligned to their job functions, with training on critical topics offered at least annually. Other training topics may be refreshed when the governing procedure or requirement is significantly updated. Where appropriate, associates may take an exam or be required to complete a newly learned activity under observation, helping ensure effective training.

We have established systems and processes to review the effectiveness of these measures, including Alcon Quality Analytics, our customer complaints and feedback database iTrack, and our Quality Health Summary dashboards, which track quality improvement actions and provide top management oversight of emerging quality issues. With a focus on proactively improving product quality, patient safety and customer satisfaction, Alcon will continue investing in system enhancements and tools that drive future improvements.

Alcon's consistently strong compliance record demonstrates the effectiveness of these measures and of our integrated, holistic approach to quality and safety. Since beginning operation as an independent company in 2019, Alcon has not been subject to warning letters, seizures, injunctions or other enforcement actions by global health authorities.

Impact and Risk Management

To manage product quality and patient safety-related impacts and risks, Alcon employs a formal risk management process aligned with ISO 14971:2019 principles and regulatory standards such as the European Union Medical Device Regulation (EU 2017/745). We identify and mitigate potential product quality and safety risks through measures such as design changes, product labeling and user training.

Risks are escalated based on their nature and severity, with our ELT urgently notified of any critical risks. If remaining risks cannot be further mitigated, we weigh the risk of use against the benefit of the device to patients. Once products are marketed, we conduct periodic risk reviews with our R&D, Global Medical Safety and Quality teams. If necessary, Alcon may recall products or conduct a field correction to protect patient safety. Recalls and field corrections are expertly managed by a dedicated team within the Quality function.

To increase resilience against supply chain risks, Alcon's Supplier Quality Assurance Program evaluates new suppliers to confirm established criteria are met, and ongoing oversight and auditing by Alcon ensures suppliers continue to meet Alcon requirements.

2023 Main Performance Indicators

- Vision Care Recall Rate: **0%**
- Surgical Recall Rate: **0.001%**
- Facilities Participating in Third Party Audit Programs for Manufacturing and Product Quality: **100%**
- Tier 1 Suppliers Participating in Third Party Audit Programs for Manufacturing and Product Quality: **100%**

Employee-Related Issues

Our success is driven by the more than 25,000 associates around the world who are delivering on our mission to help people *See Brilliantly*. And we build an even stronger Alcon by cultivating a diverse and inclusive culture. Leaders across our footprint and business lines are committed to cultivating an inclusive workplace that:

- Honors and celebrates all dimensions of diversity
- Fosters a culture of inclusion founded in mutual respect
- Ensures fair treatment, equal opportunity and support to succeed and grow

Alcon also recognizes the legitimacy of employee representative bodies—works councils or unions—and respects the rights of employees to associate freely, in accordance with local regulations.

Inclusive Culture and Engagement

Policies and Concepts

The Alcon Blueprint articulates our purpose, foundational principles and behaviors that guide how we attract, develop and retain talent and shape our culture across the enterprise. All associates are also expected to comply with our Code of Business Conduct and Global Policy on Human Rights,¹³ which outlines our expectations for acting respectfully and professionally. We do not tolerate improper or disrespectful conduct toward others in any form.

Pay for performance is Alcon's guiding compensation principle, meaning we aim to reward associates who achieve competitive business results and exemplify our values and behaviors. This strategy is designed to strengthen our performance-oriented culture, drive innovation and quality, and foster a sense of ownership for Alcon's success.

Alcon's Chief Human Resources Officer oversees all aspects of the associate experience, working with

the Global Heads of Talent Acquisition and Talent Management and Organization Development and Diversity and Inclusion, to develop systems and processes to support Alcon's ability to attract and retain the best talent and promote diversity and a culture of inclusion. Our Chief Diversity & Inclusion Officer reports directly to the Chief Human Resources Officer and is responsible for setting our vision and defining and executing our D&I strategy. Each of Alcon's ELT members has adopted D&I into their annual goals.

Our Executive D&I Council, composed of ELT members across major business lines and our Chief D&I Officer, provides guidance and decision-making for our enterprise D&I strategy. We have established eight functional D&I councils to support the activation and realization of plans, identify and implement additional tactics and further engage associates. We also have a cross-functional committee focused on applying a D&I lens to our talent practices.

We are committed to supporting the success of our associates through training and development and maintaining compensation policies and practices that reflect our company culture and ensure compliance with local regulations and laws. Alcon's Total Rewards Philosophy and documents library details our global benefits policies and guidelines for making competitive and equitable pay decisions and the administration of benefits aligned with locally competitive standards. This Philosophy, which is managed by our Total Rewards team, is regularly revised and updated.

Due Diligence Applied

We benchmark and evaluate our D&I performance annually. We also believe engagement and feedback are essential to fostering an inclusive workplace. Our Human Resources team biannually leads an associate engagement survey inquiring about key indicators, such as empowerment to make decisions, inclusion, connection to our purpose, continual improvement,

collaboration, opportunities to grow and more. Leaders discuss the results of the survey with their team to improve engagement and create better ways of working.

Measures Adopted and Effectiveness of Measures

We are always working to strengthen our culture and associate engagement. As a result of our programs' effectiveness, Alcon Inc. was recognized by Great Place to Work as a Best Place to Work in 2023. Across our footprint, we hold more than 20 Best Workplaces and Great Place to Work certifications. In Switzerland, we were named a Top Employer for 2024 and carry the Swiss LGBTI Label, which recognizes our commitment to equality.

D&I Measures

Alcon's D&I road map focuses on three themes encompassing our strategic priorities: growing our diverse talent, fostering a culture of inclusion and strengthening impactful connections. Our extensive D&I programming helps to increase our associates' awareness about diversity and inclusion and appreciation of differences, improve inclusive behaviors and leadership capabilities and embed diversity and inclusion in all of our talent practices. For example, our "How to Talk About..." guides build our leaders' and associates' confidence and understanding about what to do and say in challenging circumstances and conversations about D&I-related topics.

In response to what we heard through recent employee surveys, we implemented Elevate Brilliantly, an initiative to foster a greater understanding of our cultural priorities: Ownership and Accountability, Speed and Simplicity and Inclusion. All global associates across Alcon experienced this program in 2023 and had the opportunity to practice tools and approaches that bring these cultural priorities to life in their daily work.

We also have 10 employee resource groups (ERGs) with more than 35 chapters globally. These groups deliver programming to inspire, engage, develop and provide a community for thousands of members

across the globe. Programs include mentoring, career coaching and conversations, inspiring guest speakers, cultural heritage celebrations, community engagement and support and volunteerism. ERG leaders have the opportunity to develop and enhance their leadership skills and engage with ELT-level sponsors on the ERG initiatives strategy and execution. We also host an annual global ERG Summit that includes guest speakers, panels, awards for outstanding leadership, networking events, tours and time devoted to strategic planning and collaboration among ERG leaders.

Pay Equity Measures

Alcon conducts recurring global gender pay equity analyses to identify potential disparities and make appropriate adjustments to ensure pay equity. We assess the wage gap, which compares the annual base salary of male and female associates in the same job family per level, and the pay equity gap, which identifies compensation gaps among male and female associates in similar roles. In the US, we also assess wage gaps across race and ethnicity. Some countries conduct local pay equity analyses and report results based on local regulations. We also conduct training and provide resources for leaders to advance their understanding of pay equity practices.

Compensation and Benefits Measures

Our Benefits program includes wellness initiatives such as annual health checks, vaccinations, virtual fitness programs and subsidies for a gym. Alcon's local Employee Assistance program helps associates access confidential personal, workplace, health, legal and financial counseling services. In Switzerland, we provide a wide range of opportunities for individual flexibility in work schedules, additional vacation days above statutory provision and other arrangements that facilitate life-work balance. To support and empower our associates, Human Resources provides education about our compensation and benefits for both people leaders and associates, and the topic is covered in manager-associate conversations.

Alcon annually invests in benchmarking and consulting engagements to ensure our compensation and benefits program and strategy are fair, competitive and aligned with our long-term objectives. Our 2023 outlay in compensation engagements totaled approximately \$470,600 and benefits engagements totaled approximately \$417,500. To assess effectiveness, we regularly review associate engagement and attraction data and usage of these programs and their effectiveness against external benchmarking. We also monitor claims trends shifts that may be influenced by Alcon's health and well-being investments.

Impact and Risk Management

To manage talent-related impacts and risks, Alcon invests heavily in recruiting, training and retaining qualified individuals. We regularly assess quantitative performance metrics and qualitative associate feedback. We strive for continual improvement, regularly evaluating our internal practices, reviewing associate survey results and monitoring the market to identify potential changes that could impact our strategy.

2023 Main Performance Indicators

- Female Representation in Global Workforce: **46%**
- Female Representation in Management: **37%**
- Female Representation on the Board of Directors: **36%**
- Amount of Dollars Invested by Alcon in 2023 for Benchmarking Benefits Globally: **\$417,500**
- Amount of Dollars Invested by Alcon in 2023 for Benchmarking Compensation Globally: **\$470,600**

Health and Safety

Policies and Concepts

Our Global HSE Policy¹⁴ requires that we provide a safe workplace and strive to protect our associates, contractors, visitors, communities and customers from potential health hazards and injuries. Our HSE standards provide Alcon sites with requirements and guidelines on conducting business activities

while managing occupational health and safety. These global standards are aligned across all sites and consider compliance with regulations and other statutory obligations. Global HSE standards are implemented at all new sites, and processes are in place to verify effective implementation at existing locations on an ongoing basis.

Our HSE Management System is designed to help ensure environmental and safety compliance, investigate causes of non-compliance and implement corrective and preventive actions. The system includes our Global HSE Policy and HSE Manual, which outlines compliance obligations and describes minimum expectations for managing HSE aspects, hazards, risks and opportunities. It also describes the high-level HSE-related roles and functions across the business.

The Executive Committee at Alcon provides strategic direction for the company-wide management of HSE issues and reviews HSE programs and performance. Day-to-day, our Global Head of HSE—supported by our Global HSE team—is responsible for developing and overseeing the implementation of our corporate HSE Policy, standards, management tools and training to help our sites mitigate risk. Each Alcon manufacturing site has an HSE team and a cross-functional HSE Committee so employees can engage with management, as well as designated HSE champions who advocate for safety programs.

Due Diligence Applied

In addition to internal and external audits of our HSE Management System, the Global HSE team annually reviews injury and illness trend data, site main performance indicators, the outcomes of our HSE Management Review and other relevant inputs to determine actions for the upcoming year. We also encourage our associates to provide feedback so we can proactively address risks and advance our HSE culture. Associates can report safety concerns such as “good catches” and “near misses” through our HSE platform or by sharing concerns directly with management for resolution.

Our contractor management process holds third-party personnel to the same high safety standards.

It includes our Contractor Safety Management Standard and also involves collecting pertinent safety information from contractors and suppliers, assessing performance, verifying qualifications and conducting orientations prior to initiation of on-site work. Active contractors must renew their registration annually and complete HSE refresher training. We also audit contractor activities on-site to ensure compliance with our HSE policies.

Measures Adopted and Effectiveness of Measures

Alcon annually identifies focus areas through our HSE Management Review. In 2023, we focused on developing and rolling out new health and safety standards in areas like 3D printing. We also launched a global wellness survey and are using the results to create a holistic wellness framework aligned with global guiding principles and toolkits. This framework will help HSE teams across our footprint develop effective wellness programs.

Some locations have established occupational health services, while others, including our Geneva and Schaffhausen sites, have partnered with community medical facilities or other health service providers. Each site has its own standards, procedures and processes related to medical surveillance (pre-employment screening, audiometry, vision screening, etc.), ergonomic assessments, blood borne pathogens, injuries and illnesses, vaccinations, emergency preparedness and response and first aid.

We train associates based on their job responsibilities. All new associates undergo onboarding training that covers general HSE awareness as well as a curriculum designed by their immediate manager upon joining the organization. Some topics covered in our training programs include hearing conservation, control of hazardous energies, electrical safety and laser safety. Employees who perform high-risk work must have professional education, certifications or licenses in these areas.

Alcon has a number of different mechanisms in place to assess the effectiveness of our health and safety programs. On an annual basis, the Global HSE team

and the Head of Corporate HSE set performance targets in the Global HSE Scorecard at the start of the year. Site leadership and HSE teams discuss progress toward established targets during regular management review meetings. During the subsequent year, the Global HSE team and ELT evaluate performance and the program's effectiveness.

As a result of these measures, we outperformed our industry on health and safety performance indicators in 2023. We achieved a Total Recordable Case Rate—the frequency of illness and injury cases that must be reported to regulatory officials—of 0.41, compared to an industry average of 1.72. Our Lost Time Incident Rate—the frequency of work-related injury and illness cases resulting in time away from work—was 0.13, compared to an industry average of 0.62.¹⁵

Impact and Risk Management

Alcon integrates HSE considerations (policies and data) into the lifecycle of our business processes to proactively manage HSE risks and impacts. Our new global standard for Hazard Identification and Risk Assessment provides sites with an approach for carrying out hazard identification, risk assessment and implementation of control measures. The standard aims to help sites identify hazards that exist or may arise in the workplace and cause harm to employees or visitors. With this information, sites can implement reasonable steps to implement control measures to prevent harm.

To manage compliance risks, each of our sites completes an annual review called a Risk Register to identify and record risks and implement necessary mitigation efforts. Sites complete action plans within an established timeline for identified medium- and high-risk items. This information is shared with senior leadership and helps inform annual HSE planning and goals.

2023 Main Performance Indicators

- Total Recordable Case Rate: **0.41**
- Lost Time Incident Rate: **0.13**
- Fatality Rate: **0.00**

15. Industry Total Recordable Case Rate and Lost Time Incident Rate represent the averages of Bureau of Labor Statistics data for the following North American Industry Classification System (NAICS) business sectors: Pharmaceutical and Medicine Manufacturing (NAICS 3254), Pharmaceutical and Medicine Manufacturing (NAICS 32541), Miscellaneous Manufacturing (NAICS 339), Medical Equipment and Supplies Manufacturing (NAICS 3391), Medical Equipment and Supplies Manufacturing (NAICS 33911), Surgical and Medical Instrument Manufacturing (NAICS 39112), Ophthalmic Goods Manufacturing (NAICS 339115).

Respect for Human Rights

Alcon believes that all people should be treated with dignity and respect and recognizes the importance of maintaining and promoting fundamental human rights. We strive to respect the rights of employees to associate freely and respect their right to choose collective bargaining.

Policies and Concepts

As codified in our Global Policy on Human Rights and Codes of Conduct,¹⁶ Alcon is committed to upholding the rights of workers; prohibiting child labor, modern slavery and human trafficking within our operations and supply chain; and fostering a respectful work environment free from discrimination.

Our Third Party Code of Conduct outlines our policies on labor rights—including expectations around freely chosen labor, child labor and young workers, nondiscrimination, fair treatment, wages, benefits and working hours, and freedom of association—and health and safety expectations.¹⁷ By committing to this Code, suppliers agree to not use child labor or forced labor of any kind, including bonded, indentured or involuntary prison labor. They also agree to not engage in any other form of slavery and human trafficking. If a supplier does not meet our minimum human rights requirements, we will not do business with them.

Our Supply Chain and Modern Slavery and Human Trafficking Statement¹⁸ also describes our business practices and efforts regarding eliminating slavery and human trafficking, including an overview of our integrity and compliance program, which is designed to support legal and ethical conduct and prevent and detect violations of the law and our company policies.

Due Diligence Applied

Alcon conducts screening and targeted, risk-based due diligence assessments of our suppliers before contracting with them and periodically thereafter. Our tiered program assesses risks related to human rights in general, anti-bribery, conflict minerals and fair labor standards, among other topics. We perform risk-based audits of supplier activities as they relate to our business to confirm supplier compliance with contractual commitments, performance and quality standards.

As part of our speak-up culture, any concerns related to our Global Policy on Human Rights and Codes of Conduct, Alcon encourages suppliers and associates to ask questions and report ethical concerns by contacting a member of Alcon management, Human Resources or Legal. Reports can also be filed through the Alcon Ethics Helpline, an independently managed, confidential online service. Where permitted by law, Helpline reports can be anonymous.

We investigate all alleged violations of our Code of Business Conduct and policies and take action to remediate them promptly. If misconduct is found, we carry out appropriate corrective or disciplinary actions, up to and including termination of employment. As our Code of Business Conduct states, we do not tolerate retaliation against anyone who reports a concern in good faith or participates in investigations.¹⁹

16. Find our Global Policy on Human Rights here: https://www.alcon.com/sites/g/files/rbvwei496/files/2022-11/Global_Policy_on_Human_Rights_EN_v.1_16_Sept_2022.pdf. Find our Code of Business Conduct here: <https://integrity.alcon.com/code-business-conduct>, and our Third Party Code of Conduct here: https://www.alcon.com/sites/g/files/rbvwei496/files/2022-06/Alcon_Third_Party_Code_of_Conduct.EN_.pdf.
17. Find our Third Party Code of Conduct here: https://www.alcon.com/sites/g/files/rbvwei496/files/2022-06/Alcon_Third_Party_Code_of_Conduct.EN_.pdf.
18. Find our Supply Chain and Modern Slavery and Human Trafficking Statement here: https://www.alcon.com/sites/g/files/rbvwei496/files/2021-07/2021_Alcon_Supply_Chain_Modern_Slavery_Human_Trafficking_Statement_BOD_approved_28Apr2021.pdf.
19. Find our Code of Business Conduct here: <https://integrity.alcon.com/code-business-conduct>.

Measures Adopted and Effectiveness of Measures

Alcon is willing to work with our third party vendors to bring about improvements needed to comply with our Third Party Code of Conduct and upcoming regulations through engagement and collaboration. This may include audits, monitoring development and progress in meeting remediation action plans, referring suppliers to external experts and other reasonable steps to support continual improvements.

Through our work with EcoVadis, we will be able to integrate suppliers' performance on labor and human rights into our strategic performance results over time. Additionally, in support of integrating our commitment to human rights throughout our business, all Alcon associates receive information on our expectations through our annual Code of Conduct training.

Alcon conducts biannual training for all managers and leaders. This training covers how inclusivity relates to and furthers our mission and improves business outcomes. We have also established leadership guidelines to encourage effective teamwork, voicing concerns and discussion on how to address inclusion issues professionally.

Impact and Risk Management

Alcon has implemented robust human resources policies and controls, such as an annual audit of our associate roster, to mitigate the risk of human rights violations within our operations. In 2023, we established a process to screen and monitor new suppliers for risks by collecting information to determine the need for further risk assessments on specific areas such as labor rights and health and safety. This process has deepened our supplier engagement and understanding of human rights risks within our supply chain.

Combating Corruption

We are committed to doing business the right way, without exception. Our vigilance against corruption and bribery and our compliance with local laws and ethical practices are essential for sustainable growth.

Policies and Concepts

Our Code of Business Conduct, Third Party Code of Conduct and Global Policy on Anti-Bribery prohibit bribery and corruption in any form and require compliance with all applicable anti-corruption and anti-bribery laws.²⁰ Our internal Global Policy on Fair Competition describes our expectations for fair business dealings consistent with applicable competition laws.

Additionally, we have specific expectations for interactions with healthcare professionals and others in positions of influence over healthcare purchasing decisions. This Policy, called The Lens, is aligned with the principles of the medical device industry association codes that govern Alcon's various regions, including AdvaMed, ABIMED, APACMed and MedTech Europe. It requires that all communications related to our products and services are accurate, truthful and appropriate for the intended context consistent with their approved use.

Alcon's Global Head of Integrity and Compliance leads our Global Integrity and Compliance program, which sets clear company expectations for legal and ethical conduct. This program is designed to prevent, detect and mitigate compliance risks and aligns with the guidance of the United States Department of Health and Human Services Office of the Inspector General. Our CEO chairs Alcon's Audit and Compliance Committee, which meets quarterly to provide strategic direction and oversight of the program and compliance risk management. We have also established similar regional- and country-level compliance committees.

Due Diligence Applied

Alcon's Integrity and Compliance program prevents, detects and mitigates compliance risks across Alcon. This includes ongoing efforts to access, monitor and audit compliance with the company's policies and procedures. Before engaging third parties, we conduct risk-based screening and due diligence.

As part of our speak-up culture, Alcon encourages and expects associates to ask questions and report ethical concerns by contacting a member of management, Human Resources or Legal. Reports can also be filed through the Alcon Ethics Helpline, an independently managed, confidential online service. Concerns may be reported anonymously through the Helpline where allowed under local law. We investigate all alleged violations of our Codes and policies and take action to remediate them promptly. In addition, we conduct an annual Ethical Culture Survey to evaluate how effectively we communicate expectations to associates.

Measures Adopted and Effectiveness of Measures

Alcon's framework for ethical governance covers behavioral expectations, associate training, monitoring, auditing, risk assessment, reporting and remedial action.

We designed our robust training and awareness program to clearly communicate our expectations for ethical business practices to executives and associates—including new hires, part-time associates and contract workers. These expectations are stated in our Code of Business Conduct, which covers a wide range of topics, including anti-bribery, data protection, and anti-trust and fair competition. Associates complete annual training on the Code and additional periodic trainings on policies relevant to their roles and responsibilities, including on topics and requirements relevant at the regional and local levels. For example, those who interact with healthcare professionals and customers and other relevant roles must complete periodic training on The Lens.

In addition to risk-based due diligence on third-party business partners, we conduct risk-based monitoring and auditing to assess the effectiveness of our Global Integrity and Compliance Program. Our Ethics and Compliance team continually works to refine our program to address any gaps identified and risks triggered by changes in Alcon business activities and/or changes in external requirements. This team also provides progress reports and meets quarterly with Alcon's Audit and Compliance Committee.

These measures have proved effective at fostering awareness and an ethical culture at Alcon. In our 2023 Ethical Culture Survey, approximately 94% of associates reported that Alcon has clearly communicated our ethics expectations. Nearly 95% felt that our Code of Business Conduct training was clear and understandable.

Impact and Risk Management

We proactively assess ethics and compliance risks, including bribery and corruption risks, at each of our commercial operating locations. Through an annual assessment, we consider internal and external inputs, such as recent regulatory changes, enforcement actions, audit and monitoring findings, Ethics Helpline reports and market-level data. We use the results to select sites and topics for internal audit and monitoring activities for the upcoming year, inform the need for policy, training and other program updates and make legal and compliance staffing decisions.

2023 Main Performance Indicators

- Associate Code of Business Conduct Training Completion Rate: **98%**
- Grievances Filed: **737**
- Grievance Substantiation Rate: **54%**

Appendix

This report has been prepared in accordance with Art. 964a-c of the Swiss Code of Obligations.

General Information Required to Understand our Business	About Alcon (pg. 3) Social Impact and Sustainability (pgs. 5-6)
Description of the Business Model	Business Model (pgs. 3-4) Social Impact and Sustainability (pgs. 5-6)
Effects of Activity on Non-Financial Matters	Sustainability-Related Impacts and Risks (pgs. 7-8)
Environmental Matters	Climate Change (pgs. 9-10) Waste Management (pgs. 10-11)
Social Issues	Social Impact (pgs. 12-13) Access, Affordability and Pricing (pgs. 13-14) Product Quality and Patient Safety (pgs. 14-16)
Employee-Related Issues	Inclusive Culture and Engagement (pgs. 17-19) Health and Safety (pgs. 19-20)
Respect for Human Rights	Respect for Human Rights (pgs. 21-22)
Combating Corruption	Combating Corruption (pgs. 23-24)

Alcon Inc

Fribourg, Switzerland

Independent practitioner's limited assurance report
on the selected 2023 sustainability indicators
(including GHG emissions) included in the Swiss
Non-Financial Matters Report 2023

to the Board of Directors of Alcon Inc.



Independent practitioner's limited assurance report

on the selected 2023 sustainability indicators (including GHG emissions) included in the Alcon Inc Swiss Non-Financial Matters Report 2023 to the Board of Directors of Alcon Inc

Fribourg, Switzerland

We have been engaged to perform assurance procedures to provide limited assurance on the selected 2023 sustainability indicators (including GHG emissions) of Alcon Inc for the period from January 1, 2023 to December 31, 2023, except for the Non-hazardous Waste Landfill Diversion Rate, which is prepared for the period from January 1, 2023 to September 30, 2023 included in the Swiss Non-Financial Matters Report 2023 (the "Report").

Scope and subject matter

The following selected 2023 sustainability indicators were subject to our limited assurance engagement and represent the subject matter information:

- Scope 1 GHG emissions
- Scope 2 GHG emissions
- Reduction in Scope 1 and 2 GHG emissions
- Non-hazardous waste landfill diversion rate
- ISO 14001 entities – Certified Sites
- Students (Prekindergarten through Fifth Grade) Screened Through the Alcon Children's Vision Program
- Number of surgeons enrolled in Alcon's PD Program
- Surgical recall rate
- Vision Care recall rate
- Facilities participating in third party audit programs for manufacturing and product quality
- Tier 1 suppliers participating in third party audit programs for manufacturing and product quality
- Female Representation in Global Workforce
- Female Representation in Management
- Female Representation on the Board of Directors
- Amount of Dollars Invested by Alcon in 2023 for Benchmarking Benefits Globally
- Amount of Dollars Invested by Alcon in 2023 for Benchmarking Compensation Globally
- Total Recordable Case Rate
- Lost time incident rate
- Fatality rate
- Associate Code of Business Conduct Training Completion Rate
- Grievances filed
- Grievances Substantiation Rate

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Criteria

The selected 2023 sustainability indicators (including GHG emissions) were prepared by Alcon Inc (the 'Company') based on the Basis of Preparation at [Alcon Basis of Preparation](#) defining those principles and methodologies, by which the related indicators are internally gathered, collated and aggregated. The Alcon Basis of Preparation document is informed by the Global Reporting Initiative (GRI), the Greenhouse Gas Protocol for Scope 1 and Scope 2 and by internally developed metrics as disclosed in the Basis of Preparation on [Alcon Basis of Preparation](#). The Report was prepared to adhere to articles Art. 964a to 964c of the Swiss Code of Obligations.

Inherent limitations

The accuracy and completeness of the selected 2023 sustainability indicators (including GHG emissions) are subject to inherent limitations given their nature and methods for determining, calculating and estimating such data. In addition, the quantification of the selected 2023 sustainability indicators (including GHG emissions) is subject to inherent uncertainty because of incomplete scientific knowledge used to determine factors related to the selected 2023 sustainability indicators (including GHG emissions) and the values needed to combine e.g. emissions of different gases. Our assurance report will therefore have to be read in connection with the Alcon Basis of Preparation document used by Alcon Inc.

Board of Directors' responsibility

The Board of Directors of Alcon Inc is responsible for preparing and presenting the Report (including GHG emissions) in accordance with Alcon Basis of Preparation. This responsibility includes the design, implementation and maintenance of the internal control system related to the preparation and presentation of the Alcon Inc Swiss Non-Financial Matters Report 2023 that are free from material misstatement, whether due to fraud or error. Furthermore, the Board of Directors is responsible for the selection and application of the Alcon Basis of Preparation and adequate record keeping.

Independence and quality management

We are independent of the Alcon Inc in accordance with the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code). We have fulfilled our other ethical responsibilities in accordance with the IESBA Code, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

PricewaterhouseCoopers SA applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Practitioner's responsibility

Our responsibility is to perform a limited assurance engagement and to express a limited assurance conclusion on the selected 2023 sustainability indicators (including GHG emissions). We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) 'Assurance engagements other than audits or reviews of historical financial information' and the International Standard on Assurance Engagements 3410, Assurance Engagements on Greenhouse Gas Statements ('ISAE 3410'), issued by the International Auditing and Assurance Standards Board. These standards require that we plan and perform our procedures to obtain limited assurance whether anything has come to our attention that causes us to believe that the selected 2023 sustainability indicators (including GHG emissions) presented in the Alcon Inc Swiss Non-Financial Matters 2023 Report for the period from January 1, 2023 to December 31, 2023, except for the Non-hazardous Waste Landfill Diversion Rate for the period from January 1, 2023 to September 30, 2023 included in the Report were not prepared, in all material aspects, in accordance with the Alcon Basis of Preparation.

Based on risk and materiality considerations, we performed our procedures to obtain sufficient and appropriate assurance evidence. The procedures selected depend on the assurance practitioner's judgement. A limited assurance engagement under ISAE 3000 (Revised) and ISAE 3410 is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks. Consequently, the nature, timing and extent of procedures for gathering sufficient appropriate evidence are deliberately limited relative to a reasonable assurance engagement and therefore less assurance is obtained with a limited assurance engagement than for a reasonable assurance engagement.

We performed the following procedures, among others:

- Reviewing the Alcon's policies, manuals and Basis of Preparation;
- Interviewing Alcon's representatives at Group and entity level from the Management, Sustainability (environment and social), Human Resources, Health & Safety and Environment;
- Inquiring of personnel responsible for the preparation of the Report regarding the preparation process and selection of the selected 2023 sustainability indicators in the Report;
- Inspecting the relevant documentation on a sample basis;
- Performing tests of details on a sample basis of evidence supporting the selected 2023 sustainability indicators concerning completeness, accuracy, adequacy and consistency;

We have not carried out any work on data other than for those selected 2023 sustainability indicators. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusions.

Conclusion

Based on the work we performed, nothing has come to our attention that causes us to believe that the selected 2023 sustainability indicators (including GHG emissions) on the selected 2023 sustainability indicators (including GHG emissions) of Alcon Inc for the period from January 1, 2023 to December 31, 2023, except for the Non-hazardous Waste Landfill Diversion Rate for the period from January 1, 2023 to September 30, 2023 as presented in the Alcon Inc Swiss Non-Financial Matters Report 2023 are not prepared, in all material respects, in accordance with the Alcon Basis of Preparation.

Restriction of use and purpose of the report

This report is prepared for, and only for, the Board of Directors of Alcon Inc, and solely for the purpose of reporting to them on the selected 2023 sustainability indicators (including GHG emissions) as presented in the Alcon Inc Swiss Non-Financial Matters Report 2023 and no other purpose. We do not, in giving our conclusion, accept or assume responsibility (legal or otherwise) or accept liability for, or in connection with, any other purpose for which our report including the conclusion may be used, or to any other person to whom our report is shown or into whose hands it may come, and no other persons shall be entitled to rely on our conclusion.

We permit the disclosure of our report, in full only and in combination with the Alcon Basis of Preparation, to enable the Board of Directors to demonstrate that they have discharged their governance responsibilities by commissioning an independent assurance report over the selected 2023 sustainability indicators (including GHG emissions) without assuming or accepting any responsibility or liability to any third parties on our part. To the fullest extent permitted by law, we will not accept or assume responsibility to anyone other than the Board of Directors of Alcon Inc. for our work or this report.

PricewaterhouseCoopers SA



Mike Foley



Sidi Tangara

Genève, 20 March 2024

“The maintenance and integrity of Alcon Inc’s website and its content are the responsibility of the Board of Directors; the work carried out by the assurance provider does not involve consideration of the maintenance and integrity of the Alcon Inc’s website, accordingly, the assurance providers accept no responsibility for any changes that may have occurred to the selected 2023 sustainability indicators (including GHG emissions) or Alcon Basis of Preparation since they were initially presented on the website.”