



Alcon Industries

Code of Conduct

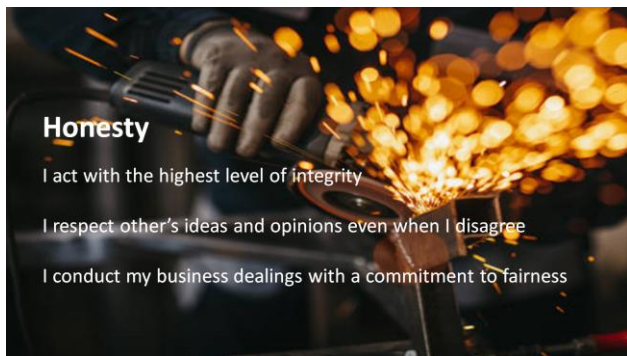
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Alcon HEAT Values

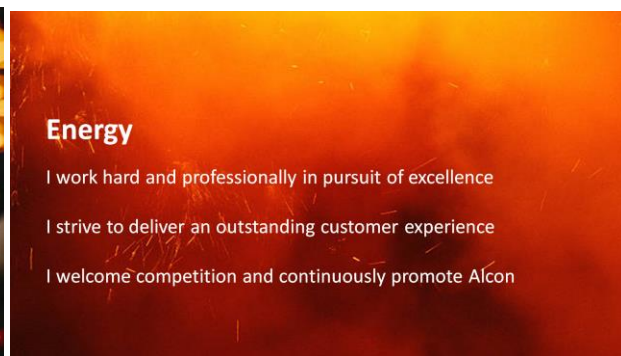
Alcon's four corporate values are actively supporting Alcon priorities, encouraging consistent behaviors, and sustaining our business success in the future.

Our HEAT values are:



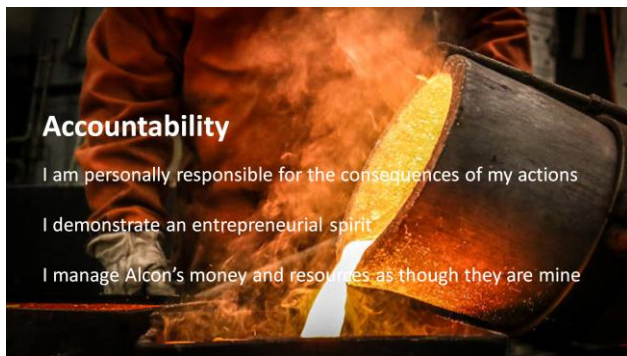
Honesty

- I act with the highest level of integrity
- I respect other's ideas and opinions even when I disagree
- I conduct my business dealings with a commitment to fairness



Energy

- I work hard and professionally in pursuit of excellence
- I strive to deliver an outstanding customer experience
- I welcome competition and continuously promote Alcon



Accountability

- I am personally responsible for the consequences of my actions
- I demonstrate an entrepreneurial spirit
- I manage Alcon's money and resources as though they are mine



Thinking

- I look for and seize business opportunities
- I deliver innovative solutions to proactively improve Alcon
- I dedicate myself to personal growth via professional development

We serve our traditional **Heat** Treatment markets with **Heat** resistant alloys via casting various **Heats** in our foundry processes.

Now, **HEAT** is the driving element for Alcon's core values.

Eight Key Areas

Alcon Code of Conduct covers 8 key areas:



Health, Safety and Environment



Trading, Customers, Products, and Services



Anti-Bribery and Corruption



Employees and Human Rights



Disclosure



Government, Society, and Local Communities



Conflicts of Interest



Competitors

Health, Safety, and the Environment

Health, safety, and environmental matters are mainstream management responsibilities. We will protect the health and safety of our employees, customers, suppliers, contractors, visitors, the public, and others affected by our operations. Public concerns about the health, safety, and environmental aspects of our operations must be addressed constructively.

We will:

- Provide healthy, safe, and secure working conditions for all employees.
- Provide sufficient human and material resources and training to meet our health, safety, and environmental commitments and obligations.
- Consider the likely environmental impact of new products and processes early in the development stage.
- Minimize, make safe, or, if practicable, prevent the release of substances that could adversely affect human health or the environment.
- Reduce waste by careful use of materials, energy, and other resources and maximize recycling opportunities.
- Provide a work environment free from the risks associated with alcohol and drug consumption.
- Minimize our environmental impact, our energy consumption, and our greenhouse gas emissions.

Trading, Customers, Products, and Services

Long-term, positive customer relationships are essential to achieving our goals. In dealing with existing and potential customers, and with agents, distributors, suppliers, and other business associates, we must maintain an unquestioned reputation for integrity, treating them all fairly, consistently, and based on mutual respect and trust.

We will:

- Consistently provide high-quality products that are reliable, safe, and meet customer needs.
- Provide high-quality, reliable after-sales service.
- Provide clear, concise, and useful information about Alcon and refrain from making false or misleading statements about our products and services.
- Conduct all business dealings at arm's length, including adherence to Alcon policies regarding conflicts of interest, gifts, and bribes.
- Safeguard the confidential information of others and use such information only for the purpose provided, not for any improper business activity or for personal gain.

Anti-Bribery and Corruption

We will not tolerate corrupt practices of any kind in the conduct of our business.

To achieve this:

- No employee nor any person acting on behalf of Alcon, including agents, suppliers, joint venture partners, or others will, either directly or indirectly, offer, provide, request, or accept payments or anything of value to any person, including suppliers or Government representatives, as a bribe or inducement to secure any improper business advantage.
- We will not make facilitation payments, unless our, or another's, personal safety is at risk.
- Our participation in entertainment and extension of hospitality will always be part of normal business activity, be reasonable considering all relevant circumstances, be proportionate and appropriate, and not give rise to a perception of a corrupt purpose.

Employee and Human Rights

Employees should be dealt with in good faith and based on respect for the dignity of the individual. Alcon recognizes international human rights standards and will not tolerate the use of child labor or forced labor in its operations.

We will:

- Listen carefully to our employees and involve them in improving the conditions of employment, work quality, and productivity.
- Ensure that recruitment, training, promotion, career development, termination, and similar employment-related issues are fair, transparent, and based on individual ability, achievement, experience, and conduct without regard to race, color, nationality, culture, ethnic origin, religion, gender, sexual orientation, age, disability, or any other reason not related to job performance or prohibited by applicable law.
- Refuse to tolerate discrimination or harassment.
- Provide a working environment that does not negatively impact our employees' physical or mental well-being.
- Ensure reasonable working hours and remunerate employees commensurate with their skills and experience and, to the extent practicable, the success of the business.
- Keep our employees abreast of important developments affecting them and Alcon's vision, goals, and plans.
- Communicate with employees in an open, honest, and respectful way.
- Maintain effective procedures to resolve work-related disputes.
- Keep employee records confidential and only collect, use, and disclose personal information for legitimate business purposes.

Disclosure

We will conduct our business in a responsible manner, seeking to produce sustainable and profitable growth and deliver value to our stakeholders. Care will be given to preserving and protecting Alcon's assets by making prudent and effective use of resources.

We will:

- Keep books and records that accurately and fairly reflect the transactions undertaken and the financial position of the business, supported by a robust system of controls.
- Provide ownership, financial institutions, or other necessary parties, on a regular and timely basis, accurate financial information and a balanced assessment of Alcon's position which is easily understandable.
- Engage in best practices in corporate governance.
- Respond clearly to stakeholders' questions on governance or Alcon's business.
- Be candid, honest, and professional in performing our duties; in communication with our advisers and auditors; and in communicating with the investment community.

Government, Society, and Local Communities

We seek to be a good corporate citizen wherever we do business. We will observe all national and local laws, ordinances, and regulations, including those regarding political activities and payment of taxes.

We will:

- Keep ourselves informed about local culture, encourage the sharing of experiences across Alcon, and be adaptable, innovative, and sensitive to our dealings with local communities.
- Respect and consider regional and local concerns, customs, and traditions.
- Conduct ourselves ethically in all public affairs activities, in alignment with local laws and regulations, including the Anti-bribery and Corruption principles set out in this Code.
- Not support any party-political organizations or make any political donations.

Conflict of Interest

Employees, officers, and directors have a duty to act in the best interest of Alcon and may not use their positions to personally profit themselves or others, or act against the best interests of Alcon. Personal interests that do, or might appear to, conflict with Alcon interests or improperly influence the performance of our duties should be avoided. It is not always possible to avoid conflicts of interest and so where an employee's interests, or those of their family and close contacts, conflict with those of Alcon or where there is a significant risk that they may conflict, the employee must declare the conflict or potential conflict immediately to their direct line manager.

Employees will never:

- Engage in direct or indirect business, financial, or other relationships not on behalf of Alcon with outside concerns that do or may do business with, or are in competition with, Alcon without receiving prior approval of such relationship from management.
- Represent Alcon in any transaction in which they or a related party has any personal interest without receiving prior approval from management.
- Improperly disclose or otherwise use confidential information of or about Alcon.
- Compete, or assist others to compete, with Alcon.
- Serve on any external board of a commercial enterprise unless such board membership is approved by Alcon management and found not to conflict with Alcon interests.
- Solicit or accept any money for personal gain from any business associate or competitor.
- Accept from any business associate or competitor any nonmonetary gift, service, or other thing if it would, or might appear to, improperly influence their independence or professional judgment.

Competitors

We will compete vigorously, but honestly, and will not seek competitive advantage through unlawful means.

We will:

- Never exchange commercially sensitive information (including prices, capacity, production, sales volumes, market shares, commercial strategy, or costs) with our competitors.
- Refrain from acquiring information regarding competitors by inappropriate means.
- Never engage in restrictive or collusive trade practices or abuse any market position.
- Refrain from engaging in unfair competition, including making false or misleading comments or claims about our competitors or their products.

Data Privacy

Alcon is committed to protecting and respecting the privacy of individuals.

Everyone has rights in respect of how their personal data is handled. During its activities, Alcon may collect, store, and process personal data about its staff, customers, suppliers, and other third parties. Alcon recognizes the need to treat such data in an appropriate and lawful manner.

Making sure it works

We must always conduct our business affairs in a manner consistent with the Code's principles. In many cases, this will require exercise of considered judgment. Please consult your supervisor or other Alcon authority if you are ever in doubt about the Code's meaning or scope. The consequences of not complying with this Code can be very serious, both for Alcon and its individual employees in terms of fines, penalties, damage to reputation, and criminal liability. Where breaches of this Code are suspected or identified, an appropriate investigation will be conducted. Where applicable, remedial action will be taken, including disciplinary consequences, up to and including dismissal. This Code will be reviewed regularly. We will also monitor the way in which it is followed. Any comments on this Code should be referred to Alcon leadership.