

BAUSCH + LOMB

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Bausch + Lomb
Global Human Rights Policy
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1. INTRODUCTION

1.1. Purpose

As stated in our Code of Conduct ([Bausch+Lomb Central - Corporate Governance Combined Policies - All Documents](#)), Bausch + Lomb believes in conducting business in a fair and transparent manner and is committed to conducting our business with the highest ethical values. In line with our mission of helping you see better to live better, this policy reaffirms our commitment to respect human rights throughout our business operations globally and along our value chain and spells out the standards that our employees, suppliers and business partners comply with.

1.2. Scope

This policy applies to Bausch + Lomb and to all its operations, subsidiaries, and affiliated companies globally, without any exception. The policy is binding to all stakeholders, including our own workforce, suppliers, business partners, customers, consumers, shareholders, investors, local groups and communities, associations, non-governmental organizations (NGOs), and governmental bodies. Bausch + Lomb also encourages its value chain partners, over whom it has no direct control, to follow the same policy standards.

1.3. Our Commitment

Bausch + Lomb is committed to respecting human rights in our business operations globally and along our value chain. We consider the respect for human rights to be a cornerstone of responsible business conduct. We comply with internationally recognized human rights standards including but not limited to those outlined in the International Bill of Human Rights, the International Labor Organization's (ILO) Core Labor Rights Conventions, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. We also adhere to the national laws and industry standards applicable where we conduct business. Where national laws differ from international human rights standards, we endeavor to meet the higher standard. We strive to avoid infringing on the human rights of others and to implement policies and processes to help identify, prevent, remedy or mitigate potential human rights and environmental risks and negative impact in our operations and value chain.

2. SALIENT HUMAN RIGHTS TOPICS

Based on our company values and the nature of our business, we have identified the following human rights topics that we consider to be salient and most relevant for our stakeholders. During our ongoing human rights due diligence or stakeholder engagement, we shall continue to monitor and identify other relevant human rights topics and make updates where necessary.

2.1. Labor Rights

2.1.1. Prohibition of child labor

We prohibit child labor including the employment of children below the minimum age for completion of compulsory education under local law and the employment of young workers in hazardous work, night work or work that is likely to harm their health, safety, and morals.

2.1.2. Prohibition of forced labor

We prohibit the use of forced labor or compulsory labor, including but not limited to debt bondage, servitude, bonded or indentured labor and involuntary prison labor.

2.1.3. Prohibition of slavery and all forms of modern slavery

We prohibit all forms of slavery and slave-trade, practices akin to slavery, serfdom or any form of modern slavery including all forms of domination, oppression in the workplace, extreme economic or sexual exploitation and humiliation, or human trafficking. We respect workers' freedom of movement and prohibit any practices that could restrict this, such as physical constraints or the retention of original identification documents.

2.1.4. Ethical recruitment of foreign migrant and domestic workers

We responsibly recruit migrant workers and prohibit recruitment practices that make workers vulnerable to modern slavery such as charging recruitment fees or other fees to secure employment benefits and retention of original identity documents and/or passports of workers.

2.1.5. Prohibition of harassment at the workplace

The work environment shall be free of harassment, harsh and inhumane treatment including but not limited to sexual harassment or abuse, corporal punishment, mental or physical or verbal abuse, coercion, intimidation, or any other form of harassment of workers.

2.1.6. Prohibition of discrimination

We treat all individuals equally and prohibit discrimination on the grounds of age, race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other protected grounds.

2.1.7. Freedom of association and collective bargaining

We respect workers' right to form or join trade unions, works councils or associations and to organize and bargain collectively. There shall be no reprisal or discrimination for formation or membership of a trade union and workers shall be free to communicate with management about working conditions without threat of reprisal, intimidation, or harassment.

2.1.8. Fair working conditions

We comply with the requirements regarding compensation, working hours, time off, rest periods, benefits, and working conditions, as set by the applicable national law, international standards or collective agreements. Working hours shall not exceed the limits allowable within the applicable national and international standards or under collective agreements. Overtime work shall be voluntary and should not exceed the limits allowable, considering business needs and the health and safety of workers. Workers shall be paid at least equal to the applicable legal minimum wage. Where there is no set minimum wage, payment shall be at least comparable to the local industry standards and sufficient for an adequate standard of living.

2.1.9. Safe and healthy workplace

We are committed to providing a safe and healthy workplace for our workforce and we comply with applicable health and safety laws and regulations, and have established policies, guidelines and standards on environment, safety, industrial hygiene and health.

2.2. Other Salient Human Rights

2.2.1. Right to health

As a leading global eye health company dedicated to protecting and enhancing the gift of sight for millions of people around the world, we respect the right to health and to access quality and affordable healthcare and commit to producing the highest quality medicine in strict compliance with Good Manufacturing Practice.

2.2.2. Environmental rights

We recognize that environmental harm can negatively impact human rights including the rights to health, life, livelihood, and access to clean water. We operate in an environmentally responsible manner and strive to minimize the impacts of our business activities on the environment, including through resource efficiency, water management, waste management, and mitigating climate change, pollution, degradation of land, or other impact on natural resources including deforestation. We also comply with all applicable environmental laws and regulations. We strive to prevent or minimize the release of hazardous substances or active ingredients via spills or via fugitive emissions to the environment or water bodies and comply with the Minamata Convention on Mercury¹, the Stockholm Convention on Persistent Organic Pollutants (POPs)² and the Basel Convention on Waste Management³. We have established policies, guidelines and standards on environment, safety, industrial hygiene and health.

¹ The Stockholm Convention on Persistent Organic Pollutants 2001

² Minamata Convention on Mercury 2013

³ Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal 1989

2.2.3. Conflict minerals and ethical sourcing

We are committed to sourcing materials in an ethical, responsible and sustainable manner, and we adhere to the legal requirements applicable where we operate including section 1502 of the Dodd-Frank Act in the U.S. and the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor.

2.2.4. Data protection and privacy

We commit to respect the fundamental right to data privacy of all individuals by acting transparently when collecting personal data, by processing data lawfully and responsibly in accordance with applicable laws and by giving individuals the chance to exercise their own data privacy rights at any time and with no burdens. Further details can be found in our [Privacy Policy](#) and dedicated SOPs.

2.2.5. Responsible use of security forces

We prohibit the use of security forces in a manner that violates human rights including through torture and cruel, inhumane or degrading treatment, or damage to life or limb.

2.2.6. Prohibition of unlawful eviction

We prohibit unlawful eviction or unlawful taking of land, forests and waters in a manner that endangers the livelihood of persons.

3. OUR HUMAN RIGHTS STRATEGY

To fulfill our human rights commitments and ensure compliance with the applicable laws and standards, we shall continuously embed human rights standards into existing company systems and policies and implement appropriate processes to identify, prevent and remedy or mitigate potential human rights risks and negative impact in our operations and value chain. We shall follow a risk-based approach which enables us to identify and address the most salient human rights issues that affect our patients, employees, and other stakeholders.

Our human rights strategy is underpinned by three pillars namely, Governance, Risk Management and Monitoring, Engagement and Reporting. These pillars translate into specific due diligence measures that make up our Human Rights Due Diligence System which is illustrated below and elaborated hereafter:



3.1. Governance

We shall establish governance structures, assign responsible persons and put in place policies and procedures to ensure the implementation of our human rights commitments.

3.1.1. Responsible persons and oversight structures

At the highest level of our organization, namely the Board of Directors (Board), three committees share responsibility for our environmental, social and governance (ESG) practices and programs which include human rights, namely, the Audit and Risk Committee, the Nominating and Corporate Governance Committee and the Talent and Compensation Committee. Under the supervision of the Vice President Global Environment, Health, Safety + Sustainability, Environmental Social Governance and Human Rights, our Manager, Human Rights is responsible for working together with the relevant departments, including but not limited to Human Resources, Procurement, Supply Chain, Operational Heads, Legal, Communications and Compliance, to operationalize the day-to-day implementation of the policy, through providing technical expertise, advice and support.

3.1.2. Policies, guidelines, and standards

In addition to this policy, we shall continuously embed human rights in relevant company policies, guidelines, and standards both at the corporate and national level. The key corporate policies that cover topics relevant to human rights include but are not limited to this Human Rights Policy, Code of Conduct, Supplier Code of Conduct, Business Ethics Reporting Policy and Environment, Safety, Industrial Hygiene and Health Policy. These policies and procedures are binding on all employees globally as well as to suppliers and business partners.

3.2. Risk Management

3.2.1. Risk analysis and other due diligence processes

We conduct due diligence on our business operations globally and our suppliers, which forms the basis for our risk-based interventions. This includes conducting risk analyses annually or on ad hoc basis in case of substantial changes or substantiated knowledge. During the risk analyses, we use a risk management software and assessment questionnaires to identify, record, assess, monitor and manage human rights and environmental risks or negative impact. We assess our business operations and our suppliers based on country risks, industry-specific risks and the nature of the product or service. We also conduct media reports and consider any information or report received through the company complaints mechanism. We may also conduct social audits on certain key manufacturing facilities and facilities of business partners and suppliers in case there is an indication of potential human rights and environmental risks or when an audit is otherwise deemed necessary. Further information is available in our Supplier Code of Conduct.

3.2.2. Corrective and Preventive Action (CAPAs)

In case material human rights risks or adverse impacts are identified through our due diligence processes, we take risk-based corrective actions or preventive actions to prevent, mitigate or end it within a stipulated period. If the issue has been identified with a supplier or business partner, we engage with them to implement appropriate measures to address the violation or negative impact. Failure to implement appropriate corrective or preventive action in the stipulated period entitles Bausch + Lomb to take enforcement actions including termination of the business relationship, and/or pursuing damages resulting from such violations (where permitted by law).

3.2.3. Complaints mechanism and access to remedy

We operate a group-wide complaints mechanism which is accessible to all stakeholder groups including our employees, workers in the supply chain and other third parties to report concerns relating to human rights, environmental issues, as well as suspected violations of other company policies and laws. The web-based reporting channel is accessible at the link [EthicsPoint - Bausch + Lomb Incorporated](#). We protect the identity of the whistleblowers and provide the possibility to submit anonymous complaints. We also prohibit retaliation, intimidation or harassment of whistleblowers. Reports received are investigated in an impartial, confidential and timely manner. Where a complaint is substantiated, appropriate remedial measures including offering redress to affected rightsholders is to be taken. Further information is available in our [Business Ethics Reporting Policy](#).

3.3. Monitoring, Engagement and Reporting

3.3.1. Monitoring progress and continuous improvement

Recognizing that human rights due diligence is a continuous improvement process, we shall monitor and review this policy and due diligence processes at least once a year and make updates where necessary to ensure that they remain relevant and effective. Documentation of the human rights due diligence measures is fundamental for effective monitoring of progress.

3.3.2. Stakeholder engagement

We shall strive to engage with relevant internal and external stakeholder groups through initiatives and processes such as dialogues with works councils and workers representatives, engagement during risk assessment processes, listening to and addressing any stakeholder concerns received in the complaints mechanism, participating in industry and multi-sector initiatives. Key functions are also involved in the development of policies and other due diligence measures. We shall continuously strengthen our stakeholder engagement initiatives.

3.3.3. Training and capacity building

Recognizing that employees play a key role in the realization of our human rights commitment, all employees are required to complete our Code of Conduct training, which covers numerous topics including human rights. Additionally, we shall provide annual training to all employees and relevant stakeholders on human rights and the contents of this Human Rights Policy.

3.3.4. Communication

In line with our company value of accountability, we recognize the importance of communication and transparency. We shall communicate relevant information about our human rights due diligence efforts with our stakeholder groups. Employees shall receive communication about this policy, and they shall complete compulsory trainings and acknowledge the policy. We have also published this policy and other relevant policies on our website where it is accessible to internal and external stakeholders, including suppliers, business partners and potential rights holders.

3.3.5. Reporting

We report annually about our human rights due diligence efforts and other ESG and sustainability efforts and provide transparency about the progress that we have made in the previous reporting year, for instance in our annual Sustainability Impact Reports, Modern Slavery Statements and other reports to state authorities in different jurisdictions including Canada, the UK and Germany. These reports are publicly accessible on our corporate website.

4. GENERAL PROVISIONS

4.1. Policy administration, implementation, and compliance

The Global Environment, Health, Safety + Sustainability, Environmental Social Governance and Human Rights function is responsible for publishing, maintaining and enforcing this policy. The relevant functions including but not limited to Human Resources, Procurement, Supply Chain, Commercial and Operational, Legal and Compliance are responsible for implementing and ensuring compliance with this policy.

4.2. Consequences of non-compliance

Employees who fail to comply with company policies and procedures will be subject to appropriate discipline, up to and including termination. For suppliers and business partners, non-compliance with human rights standards or laws, or non-adherence to this policy and other relevant policies or failure to implement appropriate corrective or preventive action entitles Bausch + Lomb to terminate the business relationship, including pursuing damages resulting from such violations (where permitted by law).

4.3. Related policies and procedures

- Bausch + Lomb Code of Conduct
- Bausch + Lomb Supplier Code of Conduct
- Business Ethics Reporting Policy
- Policy 10 - Environment, Safety, Industrial Hygiene and Health
- EHS+S Policy 32: Sustainable Business