

BAUSCH + LOMB

See better. Live better.

Bausch + Lomb Supplier Code of Conduct

As of December 5, 2024

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INTRODUCTION

Our Supplier Code of Conduct (“Supplier Code”) is an important resource for understanding our values, expectations, and ways of doing business at Bausch + Lomb. It is a foundational component of our Ethics and Compliance Program and provides guidance on making informed, smart decisions with integrity every day.

Our iconic and enduring brand is built on the deep trust and loyalty of our patients, consumers and customers established over our nearly two centuries of history. We develop, manufacture and market a comprehensive portfolio of approximately 400 products built to serve patients across the full spectrum of their eye health needs.

Our reputation is dependent on the quality of our products and the way we conduct our global business. We are committed to doing business the right way in all our interactions. By focusing on the principles in our Supplier Code, we hold each other accountable for ensuring our business is trusted to help Patients see better and live better.

Bausch + Lomb is committed to conducting business in a principled manner, exhibiting integrity. We expect our suppliers to share this commitment and to always comply with all relevant laws and regulations of the jurisdictions in which Bausch + Lomb and such supplier conduct business. This Supplier Code of Conduct represents our expectations of those individuals and entities who supply goods and/or services throughout our supply chain. Further, we expect our Suppliers to comply with Bausch + Lomb’s Code of Conduct.

If our Supplier Code differs from any applicable federal, state, or local law, the more restrictive standard applies. Should you have questions about a potential conflict between our Supplier Code and any applicable federal, state, or local law, please consult the Bausch + Lomb Procurement Department to determine proper compliance.

SCOPE

This Supplier Code applies to all suppliers who supply goods and/or services to Bausch + Lomb, as well as to their employees, agents, parent organizations, subsidiaries, affiliated entities, and subcontractors (collectively, “Suppliers”). Bausch + Lomb expects Suppliers to ensure that this Supplier Code is communicated to their employees, agents, parents, subsidiaries, affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all.

COMPLIANCE WITH LAWS

Suppliers must comply with all applicable international, national, and local laws, regulations, codes, standards, and treaties in which they operate, including but not limited to:

- Anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, Canada's Corruption of Foreign Public Officials Act, and the U.K. Anti-Bribery Act 2010;
- Anti-Competition laws;
- Data privacy laws;
- Anti-money laundering and anti-terrorism laws;
- Human rights standards and laws including labor rights laws;
- Health and safety laws;
- Sustainability and environmental laws;
- Political contribution and lobbying laws; and
- Import and export controls, including trade sanctions and U.S. anti-boycott laws.

Non-compliance or lack of proof of compliance with any such law, regulation, code, standard, or treaty may result in the immediate termination of the business relationship, and Bausch + Lomb may pursue damages resulting from such violations (where permitted by law).

ANTI-TRUST AND FAIR COMPETITION

Suppliers must comply with all applicable anti-trust and fair competition laws and regulations of the markets in which Bausch + Lomb operates by, among other things:

- Bidding independently from competitors;
- Avoiding any discussion of bidding practices with competitors;
- Refraining from any agreements, coordinated practices, or understandings that could restrict fair competition;
- Not exchanging confidential or sensitive information with competitors; and
- Only obtaining information about competitors using ethical and legal means.

Anti-trust and fair competition laws are designed to promote and protect competition in the marketplace. Bausch + Lomb believes that fair competition fosters innovation and benefits our customers and patients by bringing a wide range of products to the market and balanced pricing for these products.

Bausch + Lomb does not tolerate any verbal or written agreements with suppliers, wholesalers, distributors, customers, competitors or any third party that may illegally limit the free market or take unfair advantage of a dominant position in the marketplace. No agreement or understanding may be made with competitors to directly or indirectly control prices, including any element of pricing such as discounts, rebates, or cost. Bausch + Lomb will not allocate products, markets, or territories to boycott certain customers or Suppliers, unless required to by trade law.

Suppliers must never offer, give, request, or receive anything of value in exchange for an improper business benefit or to improperly influence an act or decision.

CONFLICTS OF INTEREST

Suppliers shall refrain from any activity that creates an actual or perceived conflict of interest (COI) involving Bausch + Lomb. A COI exists when an individual's personal interest, relationship or activity interferes with one's ability to perform the job objectively or as expected. Even the appearance of a COI should be avoided because it may damage our reputation.

Transactions that implicate a potential COI (e.g., if a Bausch + Lomb employee or family member has a financial interest in a prospective Supplier), should be disclosed using the Conflict-of-Interest Disclosure Form. Additional information is available by contacting COImailbox@bausch.com.

ANTI-CORRUPTION

Suppliers will comply with all international anti-corruption laws. Suppliers are expected and required to comply with the letter and spirit of the U.S. Foreign Corrupt Practices Act ("FCPA") [see website: www.Justice.gov/criminal/fraud/fcpa/], the Canadian Corruption of Foreign Public Officials Act, the United Kingdom Bribery Act and all other laws and regulations relating to the bribery or corruption of government officials in all jurisdictions where we operate.

FRAUD

Bausch + Lomb believes in conducting business in a fair and transparent manner and is committed to conducting our business with the highest ethical values. We will only engage in fair and open competition in compliance with applicable laws, rules, and regulations.

Bausch + Lomb does not engage in, or tolerate engagement in, any form of corrupt practices or fraudulent activities, including any anti-competitive practices such as price-fixing, collusion or entering into illegal or anti-competitive agreements, including unauthorized sub-contracting, to win or retain business.

Additionally, Bausch + Lomb does not tolerate any act that involves theft, fraud, falsification, embezzlement, or misappropriation of any Bausch + Lomb or customer asset. Suppliers shall not engage in:

- Theft or misuse of funds or property;
- Making or submitting false invoices;
- Forging invoices or creating fraudulent reports or documentation;
- Misrepresenting the nature of transactions; or
- Intentionally filing false financial records or statements.

HUMAN RIGHTS AND MODERN SLAVERY

Bausch + Lomb is committed to respecting human rights in our global business operations and along our supply chain, and we work with Suppliers who share this commitment. We comply with internationally recognized human rights standards including but not limited to those outlined in the Universal Declaration of Human Rights (UHDR), the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labor Organization's (ILO) Core Labor Rights Conventions. We also adhere to national laws and industry standards applicable where we conduct business.

We hold our Suppliers to the same standards and expect them to also comply with all relevant human rights laws and standards. Our Suppliers are expected to implement appropriate policies and processes to identify, prevent and remedy or mitigate potential human rights risks and negative impact in their operations and value chain. Suppliers are expected to only purchase services and products from companies that comply with these standards. The human rights standards and expectations are an integral part of this Supplier Code, and they include:

- Prohibition of child and underage labor: Suppliers shall neither employ children below the minimum age for completion of compulsory education under local law, nor employ young workers in hazardous or night work or work that could harm their health, safety, and morals.
- Prohibition of forced labor, slavery, and all forms of modern slavery: Suppliers shall neither use nor contribute to forced or compulsory labor, slavery, servitude, bonded or indentured labor, involuntary prison labor, or take part in any form of modern slavery including human trafficking or labor exploitation.
- Ethical recruitment of foreign migrant and domestic workers: Suppliers shall desist from recruitment practices that make workers vulnerable to modern slavery.
- Prohibition of discrimination: Suppliers shall ensure that the workplace is free from discrimination on grounds of age, gender (including pregnancy), sex, sexual orientation, marital status, race, color, national origin, disability, religion, political affiliation, union membership, or any other legally protected characteristic. Suppliers shall provide equal payment for work of equal value regardless of gender.
- Prohibition of harassment at the workplace: Suppliers shall ensure that the work environment is free of harassment, harsh and inhumane treatment including but not limited to sexual harassment or abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, or any other form of harassment.
- Freedom of association and collective bargaining: Suppliers shall respect workers' freedom to freely form and/or join labor unions, workers' councils, or associations of their own choosing, or to organize and bargain collectively.
- Fair working conditions: Suppliers shall comply with or exceed all the requirements and standards regarding maximum working hours, time off, breaks and rest periods, wages or compensation, benefits, and working conditions, in

accordance with local laws, ILO standards, collective agreements and/or industry benchmarks. Wages and benefits shall be at least equal to the applicable legal minimum wage and where there is no set minimum wage, at least comparable to the local industry standards and shall provide for an adequate standard of living. Overtime work shall be voluntary and should not exceed the limits allowable, considering business needs and the health and safety of workers.

- Prohibition of unlawful evictions: Suppliers shall not unlawfully evict or take land, forests and waters in a manner that endangers the livelihood of persons.
- Prohibition of unlawful use of private or public security forces in a manner that violates human rights including through torture and cruel, inhumane, or degrading treatment, or damage to life or limb.

CONFLICT MINERALS

Suppliers shall source materials in an ethical, responsible, and sustainable manner, and adhere to the legal requirements applicable where they 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.

Bausch + Lomb supports the humanitarian goals of the U.S. Conflict Minerals Rule and recognizes the adverse impact of the mining and trade of “Conflict Minerals” including columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives (which derivatives are currently limited to derivatives tantalum, tin and tungsten (collectively, “3TG”) by armed groups in the Democratic Republic of the Congo (DRC) and its adjoining countries (the “Covered Countries”). Bausch + Lomb will not knowingly purchase goods, parts, or materials or sell any products that contain Conflict Minerals and 3TG that finances armed conflict in the Covered Countries.

HEALTH AND SAFETY

Suppliers must provide a safe working environment for all employees and must ensure that systems and processes are compliant with applicable legislative requirements including the global requirements for the classification, labeling and handling of hazardous substances per the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). The key components of health and safety management systems should address the following areas:

- Worker Safety – Ensure that all workplace hazards are identified and assess the risks arising from such hazards. Suitable and sufficient control measures should be deployed to mitigate or eliminate these risks and adequate resources must be made available to support this process.
- Process Safety – Suppliers must have robust systems in place to prevent or respond to a catastrophic release of hazardous materials.
- Hazard Information – Safety information relating to hazardous materials shall be made available to educate, train, and protect workers from hazards.

- Emergency Planning – Suppliers should develop an Emergency Response Plan to address the potential emergency situations that could arise within their operations. These emergency plans should be reviewed regularly, updated where necessary and communicated to workers.

ENVIRONMENTAL COMPLIANCE AND SUSTAINABILITY

Suppliers must comply with or exceed the sustainability and environmental requirements of all applicable international, national, and local laws, regulations, codes, standards, and treaties in which they operate. They must operate in an environmentally responsible manner that minimizes their adverse impacts and risks on the environment and shall maintain sufficient management and monitoring systems and processes to:

- Measure, monitor and reduce greenhouse gas emissions within their operations (Scope 1 direct emissions and Scope 2 indirect emissions) and their value chain (Scope 3 indirect emissions from upstream and downstream of value chain);
- Control or treat any emissions to air, water, and land to mitigate the risk of adverse effects on people and/or the environment;
- Ensure the safe handling, movement, storage, disposal, recycling, reuse, and reduction of waste;
- Prevent or mitigate the impact of discharges of chemicals, substances, or other materials into the environment;
- Support the conservation of water, energy, materials, and other natural resources.
- Meet the requirements for Extended Producer Responsibility directives including, but not limited to, packaging labeling, packaging waste, the European Union's Packaging and Packaging Waste Directive 94/62/EC and Directive EU 2018/852.
- Comply with the requirements of REACH (Registration Evaluation Authorization and Restriction of Chemicals) Regulation 1907/2006/EC, RoHS (Restriction of Hazardous Substances) EU 2003/95/EC, WEEE (Waste Electrical and Electronic Equipment) Directive, and TSCA (Toxic Substances Control) Act.
- Participate in Supplier sustainability risk evaluation and rating programs initiated by Bausch + Lomb.

ANIMAL WELFARE

Regulatory authorities have enacted regulations pertaining to pharmaceutical, medical device and consumer products that specify certain types of laboratory animal testing as a prerequisite to human use. Animal research should be used only to address important scientific questions that cannot be answered by other means or to fulfill a regulatory requirement.

When animal testing is necessary, suppliers must commit to the humane care for, and use of, animals in their research and development programs. Suppliers must require that testing facilities maintain appropriate standards of animal care and welfare as mandated by law and in accordance with international guidelines.

We expect our third-party laboratory animal testing facilities to follow the values within our Code of Conduct when acting on our behalf. Our requirements are based on internationally recognized standards and best practices, including:

- Transparency and Accountability - Suppliers must maintain transparency in their animal welfare practices and be accountable for their actions.
- Continuous Improvement - Suppliers are encouraged to continuously improve their animal welfare practices and seek credible third-party certifications.
- Legal Compliance - Suppliers must adhere to all applicable laws and regulations governing the treatment of animals.
- Ethical Practices - Suppliers must be committed to ensuring that laboratory animal research is conducted in a humane, responsible, and ethical manner. Animal testing should only be conducted after considering alternatives and applying the internationally accepted “3Rs” to replace, reduce, or refine the use of animals. Suppliers must pursue and adopt methods and technologies that improve animal welfare.
- Humane Treatment - Animals must be treated humanely, with pain and stress minimized at all times. Suppliers must comply with the Institutional Animal Care and Use Committee (IACUC) guidelines or equivalent standards.

DATA PRIVACY / PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

When handling Bausch + Lomb data, Suppliers must comply with all applicable laws and regulations regarding the collection, processing, transfer, and retention of personal information. Suppliers are also required to adhere to all Bausch + Lomb data privacy and cybersecurity policies.

Suppliers must implement and maintain appropriate data privacy and data security systems, governance, and procedures to protect the confidentiality of Bausch + Lomb’s proprietary data and information. Additionally, cybersecurity controls must be implemented to ensure the Supplier’s ability to deliver the contracted products or services in a safe and reliable manner. These security controls should include at a minimum:

- Regular security audits and assessments
- Employee training on cybersecurity and privacy topics
- An incident response plan
- Third-party risk management
- Data minimization practices
- The use of encryption for sensitive information
- Anti-malware protection
- Data backup and recovery
- Secure authentication and access controls

Access to personal data and, in particular to sensitive information, must be restricted to individuals who need to know this information for legitimate business or legal reasons.

Any unauthorized or inadvertent disclosure of sensitive or confidential Bausch + Lomb information to a third party, or any security incident which impacts the Suppliers ability to provide the goods or services offered must be promptly disclosed to Bausch + Lomb's privacy officer & cybersecurity team in writing.

MANAGEMENT SYSTEMS, MONITORING AND TRAINING

Suppliers must establish and maintain effective management systems that facilitate compliance with this Supplier Code as well as all applicable laws and regulations, and mitigate the risks identified. This includes appropriate monitoring and record-keeping processes and systems designed to detect violations of this Supplier Code. Suppliers must implement appropriate corrective and preventive actions. Suppliers must also afford Bausch + Lomb the opportunity to periodically audit such systems, where permitted under the parties' respective contracts. Suppliers must transparently and adequately share relevant information with Bausch + Lomb, including through completion of self-assessment questionnaires and creating profiles on supplier management platforms. Suppliers must provide appropriate training, or allow Bausch + Lomb to provide training, on the requirements of this Supplier Code.

BUSINESS CONTINUITY

We expect our Suppliers, as is appropriate and as requested by Bausch + Lomb, to complete a Business Continuity/Disaster Recovery Plan to ensure minimal disruption to Bausch + Lomb's production, thus ensuring no interruption to our patients, consumers, and customers. While contingency plans cannot be developed for all potential scenarios, for those Suppliers for which Bausch + Lomb has requested such a plan, we expect Suppliers to have and maintain a robust plan to facilitate rapid response and recovery in the event of disruptions and that such plan will be made available to Bausch + Lomb upon request. In addition, Bausch + Lomb expects that Suppliers will provide timely notification of any potential disruption so that an appropriate plan of action can be collaboratively developed by the Supplier and Bausch + Lomb.

NON-DISCLOSURE AGREEMENTS

As a Supplier to Bausch + Lomb, you may be asked to sign a non-disclosure agreement, utilizing a Bausch + Lomb standard form that has been created for this purpose, depending upon the level of technology or information disclosed during the course of business. It is Bausch + Lomb's policy that Suppliers shall not use, transmit or disclose confidential information to any third party except in accordance with the terms of such a non-disclosure agreement or non-disclosure requirements stipulated in any other written agreement. Supplier shall not make public announcement about or advertise the existence of such an agreement, divulge its terms and conditions or any relationship with Bausch + Lomb other than with prior written agreement of Bausch + Lomb. Suppliers shall agree not to display or use the Bausch + Lomb logo, trade

secrets, trademark, or product(s) in any manner without Bausch + Lomb's prior written permission.

CONTINUOUS IMPROVEMENT AND CHANGE MANAGEMENT

The continuous improvement philosophy encourages process improvements. Suppliers must provide written notification of changes to the manufacturing or quality control processes for Bausch + Lomb products/services, including, but not limited to, changes to supplier site of manufacture, process changes, testing changes, component or raw material changes or any change that could reasonably affect the quality, performance, appearance, safety, reliability, efficacy, stability, sterility, and/or form, fit or function of products, and shall obtain Bausch + Lomb's written approval before implementing any such change. Such approval shall not be unreasonably delayed or withheld.

SUB-TIER SUPPLIER CONTROL

Suppliers shall maintain appropriate qualifications for subcontractors and the products purchased from them. It is the Supplier's responsibility to ensure and control the quality of all components and raw materials that are purchased to manufacture materials, components, and parts for Bausch + Lomb. Suppliers are responsible for ensuring product(s) manufactured utilize only authentic, conforming, and specified materials and/or components as stipulated in the Supplier's Bill of Material (BOM), the Supplier's purchase order, or other equivalent document. Prior to implementing changes, including changes requested by sub-tier suppliers, Suppliers must notify Bausch + Lomb as described in the section above.

QUALITY AND GOOD MANUFACTURING PRACTICES

Suppliers shall ensure they are providing materials, products and services that comply with applicable laws, regulations, health authority standards, industry guidance and any additional customer requirements. Suppliers shall, where applicable, abide by the Quality Contract in place governing Good Manufacturing Practices (GMP) activity, expectations, and requirements. Additionally, Good Laboratory Practices and Good Distribution Practices expectations and requirements are to be met, where applicable.

Suppliers that are subject to GMP requirements shall:

- Hold and maintain the necessary manufacturing licenses, permits and registrations (or comparable authorizations) in respect of the materials, products and/or services supplied to Bausch + Lomb and for the relevant facility issued by relevant regulatory authorities.
- Ensure that all data relevant for any activities conducted to provide materials, products and/or services to Bausch + Lomb, is accurate, controlled, safe from manipulation or loss and compliant with all health authority standards and industry expectations for data integrity.
- Take measures to ensure security and integrity of the supply chain, including but not limited to measures for anti-tampering, anti-counterfeiting, and product serialization requirements, etc.

- Cooperate with Bausch + Lomb in implementing new or changed health authority standards or expectations in time for regulatory implementation.

RAISING CONCERNS

Suppliers should maintain and publicize a mechanism for employees and other individuals to report potential violations of this Supplier Code (e.g., a hotline) without threat of retaliation, intimidation, or harassment. Should a Supplier become aware of behavior that represents a violation of this Supplier Code, Supplier shall promptly notify their Procurement representative or shall report the matter via the Bausch + Lomb confidential hotline at bauschandlomb.ethicspoint.com. Bausch + Lomb will use reasonable efforts to maintain the confidentiality of the identity of anyone reporting a violation of this Supplier Code to the extent possible and still investigate such reported violation and subject to any legal requirement for disclosure.

REFERENCES

- [Bausch + Lomb Code of Conduct \(bausch.com\)](https://www.bausch.com)
- [Global Anti-Bribery Policy \(bausch.com\)](https://www.bausch.com)
- [EHS+S Policy 32: Sustainable Business \(bausch.com\)](https://www.bausch.com)