

## **GLAUKOS CORPORATION HUMAN AND WORKFORCE RIGHTS POLICY**

Glaukos Corporation (“Glaukos”), is committed to upholding human and workplace rights throughout our operations and our products and services, including consistent treatment among people, employee well-being and security, and economic and social freedom. Glaukos respects international human rights principles, including the International Labor Organization Declaration on Fundamental Principles and Rights at Work. This Human and Workforce Rights Policy set forth key principles that guide us in operating our business in order to achieve this policy.

- Glaukos is committed to supporting, respecting and protecting human rights in every aspect of our business. We will not tolerate human rights abuses, human trafficking and/or slavery and will not engage or be complicit in any activity that solicits or encourages human rights abuse.
- We expect our suppliers, vendors and business partners to comply with internationally-recognized human rights standards.
- Beginning in 2019, Glaukos’ Board of Directors will receive at least annual reports from management regarding environmental, health and safety, and social matters, including our conformance with the provisions of this Policy.
- Glaukos has adopted a Supplier Code of Conduct. While we recognize that each supplier will have varying policies and approaches to human rights, we strive to engage with those suppliers whose values and business principles reflect their respect for the human rights of the people with whom, and the communities in which, they do business.
- Glaukos is committed to fair labor practices, while respecting the national and local laws of the countries and communities where Glaukos operates. We strive to foster safe, respectful and inclusive workplaces and does not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.
- We have adopted an Affirmative Action and Equal Opportunity Policy Statement (the “EEO Policy”) that affirms that we are an equal opportunity employer. As stated in the EEO Policy:
  - Glaukos recruits, hires, assigns, promotes, sets compensation and takes all other employment actions without regard to race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations;
  - In order to achieve our commitment to appropriate gender and minority representation within the workforce, we participate in targeted recruitment of minority, women, veteran, and disabled job-seekers to ensure representation in the applicant pool for all levels of the workforce, including senior management levels;
  - Beginning in 2019, we provide the EEO Policy to our primary subcontractors, vendors and suppliers; and

- In order to confirm our commitment to internal pay equity and pay transparency, Glaukos conducts an annual pay equity analysis, and regularly evaluates pay practices in connection with new hires and promotions.
- Glaukos complies with all local applicable laws and regulations relating to wages, work hours, overtime and benefits. We are committed to a fair or living wage for all employees.
- Glaukos recognizes its responsibility to maintain a workplace that is free from violence, harassment, intimidation or other unsafe or disruptive conditions. We are committed to ensuring that we provide a safe and healthy workplace to all employees, and that the Glaukos workplace complies with applicable laws, regulations, and policies. Employees are encouraged to bring forth safety concerns and input to ensure a safe working environment.
- Glaukos respects the ability of employees to choose whether or not to join unions and engage in collective bargaining, as permitted by applicable laws in the countries where we do business.
- Glaukos conducts an annual global employee engagement survey that measures employee satisfaction, and presents the results to all employees globally and to its Board of Directors.
- We expect our team members to adhere to our Code of Business Conduct and Ethics, and believe that honesty, trust, and integrity should guide our business activities. We regularly monitor and refine our business practices to help ensure all team members are performing ethically and with integrity.