

## **GLAUKOS CORPORATION SUPPLIER CODE OF CONDUCT**

### **Applicability**

Glaukos Corporation (“Glaukos”) endeavors to conduct business responsibly and ethically. Glaukos respects international human rights principles, including the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. Glaukos expects its suppliers to observe responsible workplace practices and uphold the principles of Glaukos’ Human and Workforce Rights Policy. This Supplier Code of Conduct (“Code of Conduct”) applies to all direct suppliers that provide components to Glaukos for use in Glaukos’ products (“Supplier”). The Code of Conduct is aligned with Glaukos’ Human and Workforce Rights Policy and outlines the requirements and expectations for Suppliers throughout their operations and throughout their entire product supply chain. Glaukos expects its Suppliers to develop and implement internal business processes in compliance with the Code of Conduct.

### **No Child Labor**

Supplier shall adhere to minimum age provisions of applicable laws and regulations. Child labor is prohibited.

### **Voluntary Employment**

Supplier shall prohibit the use of all forms of forced or involuntary labor, slavery or human trafficking.

### **Work Hours and Wages**

Supplier shall compensate employees relative to the industry and local labor market. Supplier shall operate in compliance with applicable wage, work hours, overtime and benefits laws and regulations.

### **No Discrimination, Abuse, or Harassment**

Supplier must treat workers with respect and dignity. Supplier will not engage in any unlawful discrimination, harassment or abuse of any kind.

### **Health and Safety**

Supplier must provide a safe, healthy, and sanitary working environment in compliance with applicable laws and regulations. Supplier must take reasonable steps to prevent workplace hazards and work-related accidents and injuries.

### **Freedom of Association and Collective Bargaining**

Supplier must respect the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

### **Business Integrity**

Supplier must operate with the highest standards for business integrity, and comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Supplier cannot offer or accept any bribe, kickback, favor or use any improper influence when dealing with government officials or in any business arrangements. Supplier must also respect Glaukos’ corporate policies regarding business conduct, such as conflicts of interest, gifts and entertainment, and confidentiality as set forth in Glaukos’ Code of Business Conduct and Ethics.

### **Demonstration of Compliance**

Supplier must be able to demonstrate compliance with this Code of Conduct upon Glaukos’ request, and Glaukos expects you to take action to correct any non-compliance. Glaukos reserves the right to audit Supplier’s operation and facilities to determine compliance with this Code of Conduct and terminate an agreement with any Supplier that cannot demonstrate such compliance.