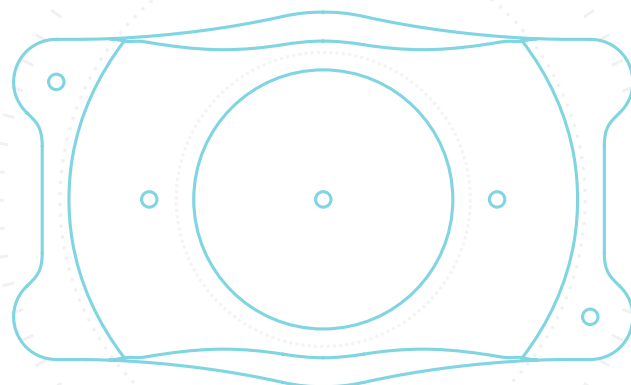


2024 Sustainability Report

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Introduction

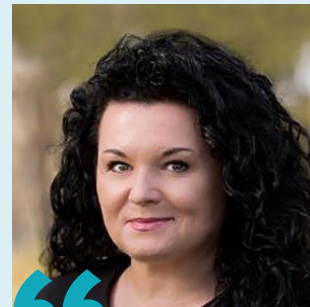
We are honored to share this STAAR Surgical Company Sustainability Report with you, focusing on our commitment to sustainability and our corporate value of employee empowerment in 2023. Our mission is to develop, manufacture, and market exceptional implantable lens-based solutions for patients seeking visual freedom. We are committed to delivering on our mission in an ethical and sustainable manner, with a focus on stakeholders such as investors, business partners, employees, customers, and the communities and patients they serve!

2023 was a transformative year for STAAR Surgical. In 2023, we experienced significant growth with increased revenue and sales in various markets. In addition, we welcomed a new Chief Executive Officer, Tom Frinzi, and two new senior business leaders: Warren Foust as Chief Operating Officer, and Magda Michna, PhD as Chief Clinical, Regulatory, and Medical Affairs Officer. Mr. Frinzi introduced a new leadership initiative known as the “High Performance Management System” (HPMS). The HPMS is a collaborative decision-making process intended to enhance growth and productivity. We are excited the system can further help all employees actively participate in the decision-making process at STAAR.

We are proud to have delivered industry leading growth once again. In 2023, we grew revenues year-over-year by 13%, and we grew sales of our Implantable Collamer® Lenses (ICLs)* year-over-year by 18%. We generated net income of \$21 million in 2023, and we ended the year with cash, cash equivalents, and investments available for sale of \$232 million. We believe these achievements position us well for 2024 and beyond. We accomplished this financial performance at a time when the global refractive industry was roughly flat and even declining in certain markets year-over-year. Our continued solid financial performance allows us to support our commitment to enhancing our sustainability practices, diversity initiatives, and our investment in reducing our environmental footprint.

**Collamer is a registered trademark of STAAR Surgical Company.*

STAAR INSIGHT



Our board and employees share a dedication to ethical practices and respect for all STAAR stakeholders. We're committed to reducing our environmental footprint and fostering a culture of sustainability and inclusivity. I'm proud to be a part of STAAR's ongoing efforts to continue growing our business and helping patients while upholding respected values that resonate with stakeholders worldwide."

Magda Michna, PhD

Chief Clinical, Regulatory, and Medical Affairs Officer

Our Board of Directors (our “Board”) supports our sustainability initiatives and the successes we’ve achieved. Our global teams of cross-functional employees actively engage in proposing projects and participating in efforts to boost operational efficiency, cut costs, and lessen our carbon footprint. Their empowered mindset plays a crucial role in shaping our sustainability efforts and overall business success.

Looking ahead, we intend to harness new tools as they become available to further enhance our sustainability practices. Our Environmental, Social and Governance (ESG) and Diversity, Equity, and Inclusion (DEI) efforts enrich and strengthen our relationships with stakeholders and boost our long-term financial performance by aligning with the values of our investors, business partners, employees, customers, and the communities and patients we serve.

This report reflects our commitment to sustainability and the crucial role of empowered employees in driving our success. Please explore the report for more details on our sustainability journey at STAAR Surgical.

About STAAR Surgical

STAAR, which has been dedicated solely to ophthalmic surgery for over 40 years, designs, develops, manufactures and markets implantable lenses for the eye. These lenses are intended to provide visual freedom for patients, lessening or eliminating the reliance on glasses or contact lenses. All of these lenses are foldable, which permits the surgeon to insert them through a small incision. STAAR’s lens used in refractive surgery is called an Implantable Collamer Lens or “ICL,” which includes the EVO ICL™ product line. More than 3,000,000 ICLs have been sold to date and STAAR markets these lenses in over 75 countries. To learn more about the ICL go to: EVOICL.com. Headquartered in Lake Forest, CA, the company operates manufacturing and packaging facilities in Aliso Viejo, CA, Monrovia, CA, and Nidau, Switzerland. For more information, please visit the Company’s website at www.staar.com.

**EVO ICL is a trademark of STAAR Surgical Company.*

2023 Highlights

We are proud to highlight some of our major accomplishments:



Fourth consecutive year of Energy Intensity reduction for a total reduction of 40%+ since 2019.



Total philanthropic financial donations in 2023, including our global employee charitable matching program, equivalent to over \$300 USD per employee.

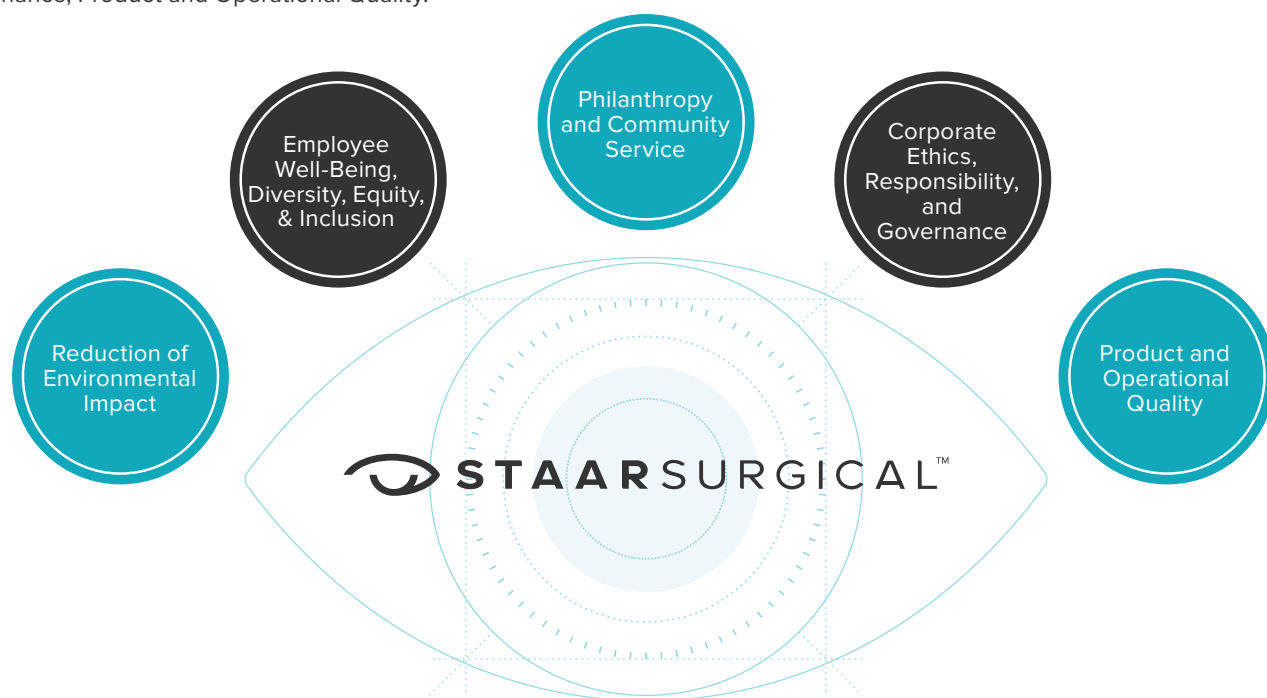


100% attainment of global compliance to all mandatory employee training, including health and safety and ethical business practices, with a 20%+ reduction in employee turnover.

Corporate Responsibility at STAAR

Our Board oversees the adoption and implementation of our ESG initiatives. As reflected in their charters, each Board committee plays a role in the oversight of ESG matters. The Nominating and Governance Committee provides oversight of sustainability and environmental matters; the Compensation Committee provides oversight of human capital management matters; and the Audit Committee provides oversight of a range of risks, including cybersecurity. Each Board committee receives updates from management regarding the ESG initiative assigned to it and reports significant matters to the full Board. Please visit the [STAAR Surgical website](#) to view our Board committee charters and our Proxy Statement for more information.

We recognize the importance of environmental and social responsibility as we strive to successfully grow our business. We've organized our corporate responsibility efforts in this report into the following key areas: Reduction of Environmental Impact; Employee Well-Being, Diversity, Equity, & Inclusion; Philanthropy and Community Service; Corporate Ethics, Responsibility, and Governance; Product and Operational Quality.



About This Report

In this report, we use the terms “we,” “us,” “STAAR,” “STAAR Surgical” or “the company” to refer to STAAR Surgical Company. This report provides data and highlights primarily covering STAAR’s fiscal year 2023, which ran from January 1, 2023, to December 29, 2023. It also notes progress on sustainability projects since the last publication of our sustainability report and projects through March 2024. This report is informed by the reporting guidelines set forth by the Sustainability Accounting Standards Board (SASB) Medical Equipment and Supplies industry standard and the Task Force on Climate-related Financial Disclosures (TCFD). This report includes data from STAAR Surgical’s North American facilities, and where indicated, STAAR Surgical’s Swiss and Japanese subsidiaries. All reported data are best estimates. This report also includes our SASB Index located in Appendix B, a voluntary public disclosure providing transparent, relevant corporate responsibility information to investors and other key stakeholders.

Throughout this report, we refer to our facilities by the municipalities where they are located:

Lake Forest

25651 Atlantic Ocean Dr, Lake Forest, CA 92630, USA

Monrovia

1911 Walker Ave, Monrovia, CA 91016, USA

Tustin

15102 Red Hill Ave, Tustin, CA 92780, USA

Aliso Viejo

27121 Aliso Creek Rd # 100, Aliso Viejo, CA 92656, USA

Nidau

Hauptstrasse 104, 2560 Nidau, Switzerland

Brugg

Portstrasse 35, 2555 Brugg, Switzerland

Ichikawa

〒272-0001 Chiba, Ichikawa, Futamata, 717-30, Japan

Urayasu

〒279-0012 Chiba, Urayasu, Irifune, 1 Chome-5-2 5F, Japan

Reduction of Environmental Impact

GRI 307: Environmental Compliance

At STAAR Surgical, our dedication to environmental stewardship is at the core of our operational ethos.

As we delve into the Environmental section of the 2024 Sustainability Report, we reaffirm our unwavering commitment to reducing our environmental impact and fostering a culture of sustainability. Throughout the year, our focus has been on integrating eco-conscious practices into our operations, taking steps so that our actions today pave the way for a greener and more sustainable tomorrow.

Reduction of environmental impact highlights include:

- A 40%+ reduction in energy intensity from 2019 to 2023
- A 25%+ reduction in GHG (greenhouse gases) intensity from 2019 to 2023
- Solar-powered vehicle charging station and EV fleet management contributing the equivalent of more than 7,500,000 smartphone charges in 2023
- Initiated CO₂e tracking for European and LATAM customer and industry events in order to establish a baseline

Our efforts extend beyond mere compliance; they embody a proactive approach towards sustainability. Our empowered employees are dedicated to a greener world for all while delivering true value to our company and shareholders.

An employee-driven environmental impact analysis of customer and industry events delivered a detailed analysis of the carbon footprint associated with various events, providing us a baseline to enable the company to monitor and plan for upcoming events effectively. Our fleet management team in Switzerland is transitioning to electric vehicles to reduce greenhouse gas emissions from transport needs, while in California, our mobility and commuting program has resulted in a 80%+ reduction in GHG contribution from 2022.

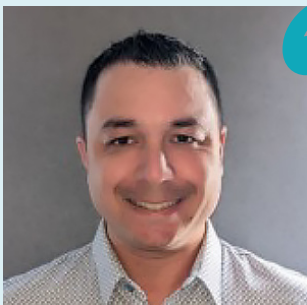
The collaborative work of our ESG Committee and Climate Risk Committee has been instrumental in driving these initiatives forward, engaging employees globally in environmentally friendly practices.

As we navigate the challenges posed by climate change risks and seek opportunities for growth and resilience, we remain steadfast in our pursuit of sustainable business practices. The data presented in this report reflects our ongoing commitment to reducing energy consumption, increasing renewable energy usage, and mitigating greenhouse gas emissions. Our journey towards environmental excellence is not just a corporate responsibility but a testament to our vision for a sustainable future.

Promoting an Environmentally Responsible Culture

Our ESG Committee and Climate Risk Committee and their sub-committee continued to coordinate and manage our activities around the world to reduce the company's environmental

STAAR INSIGHT



As a steward of sustainability and environmental responsibility both personally and professionally, I am committed to shaping a future where our actions today positively impact tomorrow. Leading the charge within STAAR Surgical's ESG Sub-committee, I strive to integrate eco-conscious practices into our operations.

From overseeing our Southern California facilities and construction projects to spearheading initiatives like solar panel installations, water conservation efforts, and managing GHG emissions, what I really appreciate about STAAR Surgical is that we are empowered to consider our impact on the environment in our daily activities. I am committed to promoting a culture of environmental excellence that not only benefits our company but also contributes to a greener, more sustainable world for all."

Justin Reed

Senior Director Global Facilities & Engineering

impact. The ESG Environmental sub-committee, comprised of employees located in the United States, Europe, and Asia, is a cross-functional group that is responsible for engaging employees and identifying opportunities to implement environmentally friendly and sustainable practices. The sub-committee meets regularly to discuss new projects and report on the advancement of ongoing ones.

GRI 302: Energy—Operational Energy Use and Management

Energy Conservation

In 2023, our commitment to sustainability led us to prioritize energy conservation as a pillar of our environmental initiatives. With the completion [of solar panel installations at our Lake Forest and Monrovia facilities](#), we took significant strides towards harnessing renewable energy sources and reducing our carbon footprint. Globally, our focus extended to empowering our employees to envision and drive energy conservation efforts. Through initiatives such as regulating thermostats during off-hours, implementing motion detector lighting in new facilities, and transitioning to rechargeable batteries, we fostered a culture of energy efficiency across our organization.

As we look ahead, energy conservation remains a priority. Not only does it align with our environmental goals, but it also enhances operational efficiency and cost-effectiveness. By proactively managing our energy consumption, we reduce our environmental impact and bolster our bottom line by optimizing energy costs as a percentage of revenue.

We incorporate environmental considerations into our decision-making processes where applicable. We seek to evaluate the inputs and impacts of current and future projects and empower our employees to contribute suggestions to our ESG teams. Through annual analyses of ongoing and proposed initiatives, we strive to implement best practices for energy conservation when practical. This proactive approach drives operational excellence and supports our commitment to sustainable business practices.

Operational energy use and management highlights include:

- A 10% reduction in Energy Intensity (kWh/\$1,000 USD in sales) from 2022 to 2023. This is our fourth consecutive year of decreased Energy Intensity demonstrating our ongoing efforts to reduce non-renewable energy consumption.
- 250,000+ kWh of renewable electricity energy delivered in 2023, an increase of 200%+ over 2022.

Global Operations Energy Usage

The following table details energy usage (in kilowatts, kWh) based on available data for each year. We use energy intensity as our key metric to track operational energy usage as our business continues to grow. We calculate Energy Intensity as the ratio of energy usage divided by \$1,000 USD in sales.

As the data shows, our Energy Intensity continues to decrease, even while our energy usage increases due to business growth. And importantly, in 2023, we continued our trend of year-over-year reduction in Energy Intensity with a 10% decrease from 2022, continuing our successful effort to drive energy efficiencies at our facilities.

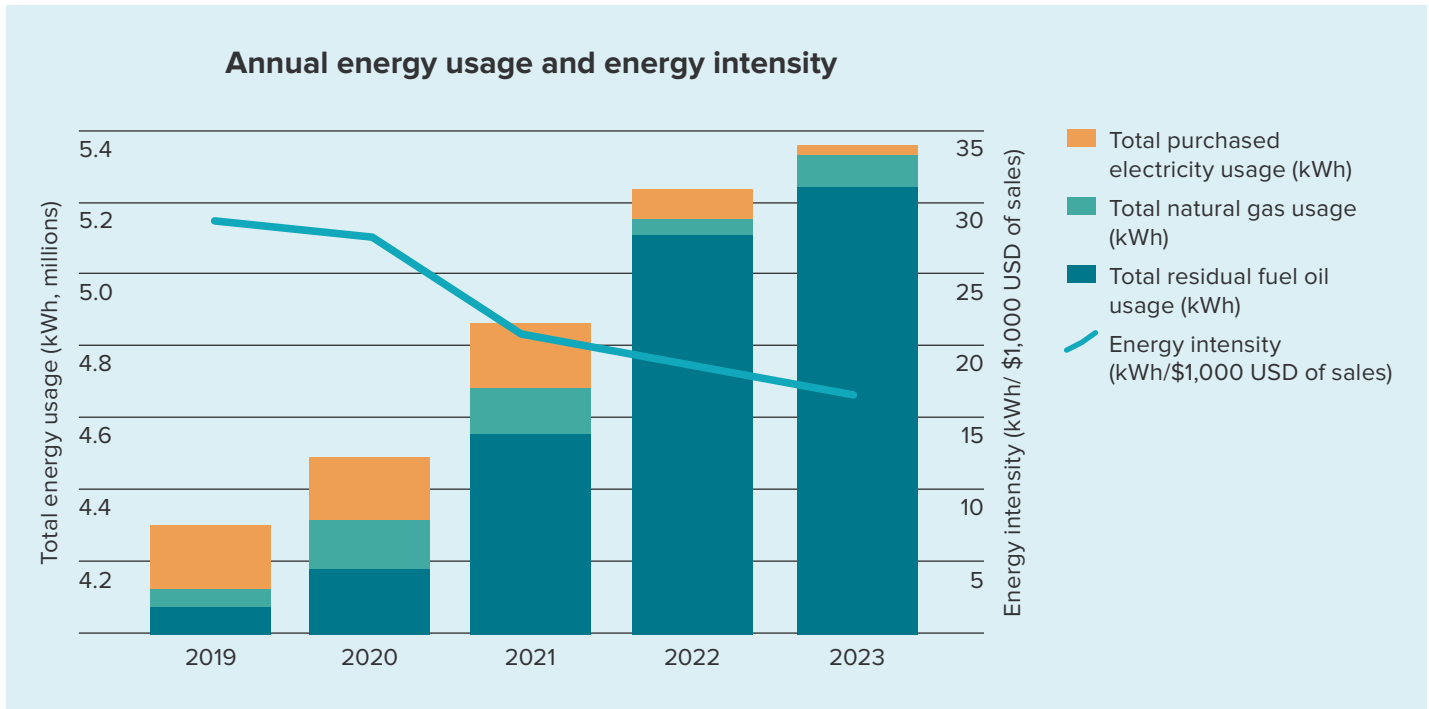
METRIC	2019*	2020**	2021**	2022**	2023**
Total purchased electricity usage (kWh)	4,075,449	4,181,520	4,554,740	5,104,273	5,253,634
Total natural gas usage (kWh)	50,434	132,760	126,772	43,598	79,960
Total residual fuel oil usage (kWh)	175,538	175,538	175,538	83,205	16,001
Total propane usage (kWh)***	268	268	268	51,840	3,972
Total energy usage (kWh)	4,301,689	4,490,086	4,857,050	5,282,917	5,353,566
Total net sales (\$USD rounded)	\$150,200,000	\$163,500,000	\$230,500,000	\$284,400,000	\$322,400,000
Energy intensity (kWh/\$1,000 USD of sales)	28	27	21	18	16
Y-O-Y energy intensity percent reduction		-4%	-23%	-11%	-10%

*2019 data includes US facilities (Monrovia, Lake Forest, Aliso Viejo, Tustin), Switzerland facility (Nidau), and Japan facilities (Ichikawa and Urayasu).

**2020, 2021, 2022, 2023 data includes the same facilities as 2019 plus Brugg, Switzerland.

***Propane use is estimated based on frequency of propane tank refill. Note that in 2022 and 2023, more propane-fueled equipment was utilized to support our growth.

The following chart graphically represents the data in the previous table. Total energy usage (left axis) by energy type is represented by the bar graph, while the line graph overlay represents energy intensity (right axis). As the graph illustrates, when our production increased, our overall energy intensity continued to decrease, representing more efficient and effective use of energy in our global operational energy usage.



We continue to focus on our renewable energy efforts in our three Southern California facilities: Lake Forest, Monrovia, and Tustin. All facilities comply with applicable local codes, including California's Title 24 Building Energy Efficiency Standard for new construction. We began operations of the renewable energy panels at our Lake Forest facility at the end of April 2023, with this facility quickly becoming the largest contributor to our renewable energy program by generating 185+ MWh of energy (about 65% of total contribution).

We completed construction and testing of the renewable energy solar panels at our Monrovia facility and received operating permission in December 2023.

The total annual savings through the photovoltaic (PV) installations in all locations* is approximately 195 MTCO₂e, which is equivalent to any one of the following:



*Note that not all PV installations at our facilities were operational in 2023. This includes a partial year for the Lake Forest facility and only a few days for the Monrovia facility.

**GHG Calculation from: www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

GRI 305: Emissions—Climate and Greenhouse Gas Emissions

Climate-Related Opportunities and Risk

Our cross-functional ESG Committee, comprised of team members from various departments, continued their efforts to enhance our understanding of climate change risks and to implement strategies aimed at minimizing the environmental footprint of our operations. Following a review of material sourcing in 2021, it was determined that supply chain scarcity poses minimal immediate threat to the majority of our business activities. Our primary operational vulnerability lies in the potential seismic risks posed by earthquakes in regions where our facilities are located, particularly in California and Japan.

In a strategic move to bolster our operational resilience, we have embarked on a significant initiative to expand our manufacturing capacity by re-investing in manufacturing operations at our Nidau, Switzerland facility. This ongoing project is intended to support our expected growth while mitigating the risks associated with our current reliance on manufacturing in Southern California. We believe STAAR will benefit from increased production capabilities and operational flexibility. Upon completion, this expansion will also provide us with the agility to relocate operations if required, thereby fortifying our business continuity strategies.

We acknowledge that the location of our core operation in Southern California makes us susceptible to drought conditions. While our industrial operations are relatively low water-intensive, we recognize the potential commercial implications linked to water scarcity that necessitate vigilant monitoring and proactive mitigation measures. Additionally, we remain cognizant of the transition risks stemming from evolving climate legislation, understanding that regulatory changes could lead to increased compliance costs for our organization. We will continue to monitor and stay abreast of these developments and adapt our strategies accordingly to navigate potential challenges effectively.

The year 2023 was the first complete year we actively incorporated the STAAR “Guidelines for Planning Green Meetings” which encourages employees to consider environmental impact in our meetings and planning practices. By using this guidance, STAAR now has a baseline for customer, user, and industry events by which to track our CO₂e and impact. More information is detailed in the Event Management section of this report.

Supplier Climate Risk

In alignment with the principles outlined by the TCFD, we have proactively extended our climate risk assessment efforts to encompass critical vendors within our supply chain network as part of our over arching sustainability strategy. To facilitate this initiative, our Climate Risk Committee has collaborated with a reputable third-party consultancy to conduct a comprehensive evaluation of climate risks associated with our key suppliers.

As we move into 2024 and complete our enterprise resource planning (ERP) upgrade, we plan to utilize the results of this study to prioritize corrective action plans for key suppliers with substantial business sustainability risks for us. These plans may include material, production, and physical impacts to supplier compliance with existing and emerging emissions targets in various countries or regions.

Operational Greenhouse Gas Emissions

Previously, we conducted an inventory of Scope 1 and Scope 2 GHG emissions as part of our ongoing environmental stewardship initiatives. Looking ahead to 2024, we have plans to refresh our Scope 1 and Scope 2 inventory alongside a comprehensive material assessment. Our GHG accounting practices for Scope 1 and Scope 2 align with the guidelines set forth by the World Resources Institute's Greenhouse Gas Protocol, laying the foundation for our annual emissions monitoring and identification of GHG mitigation opportunities.

Utilizing our GHG inventory as a strategic tool, we aim to leverage the insights gained to inform our approach towards addressing climate-related risks and capitalizing on potential opportunities. Building upon past efforts focused on reducing our GHG footprint, we remain committed to implementing sustainable practices and policies that contribute to our ongoing environmental objectives.

The table below reflects our GHG emissions (Scope 1 and Scope 2) based on available data for each year. We use GHG intensity as a metric to track operational GHG emissions as our business continues to grow. We calculate GHG intensity as the ratio of energy usage divided by \$1,000 USD sales.

Operational greenhouse gas emissions highlights include:

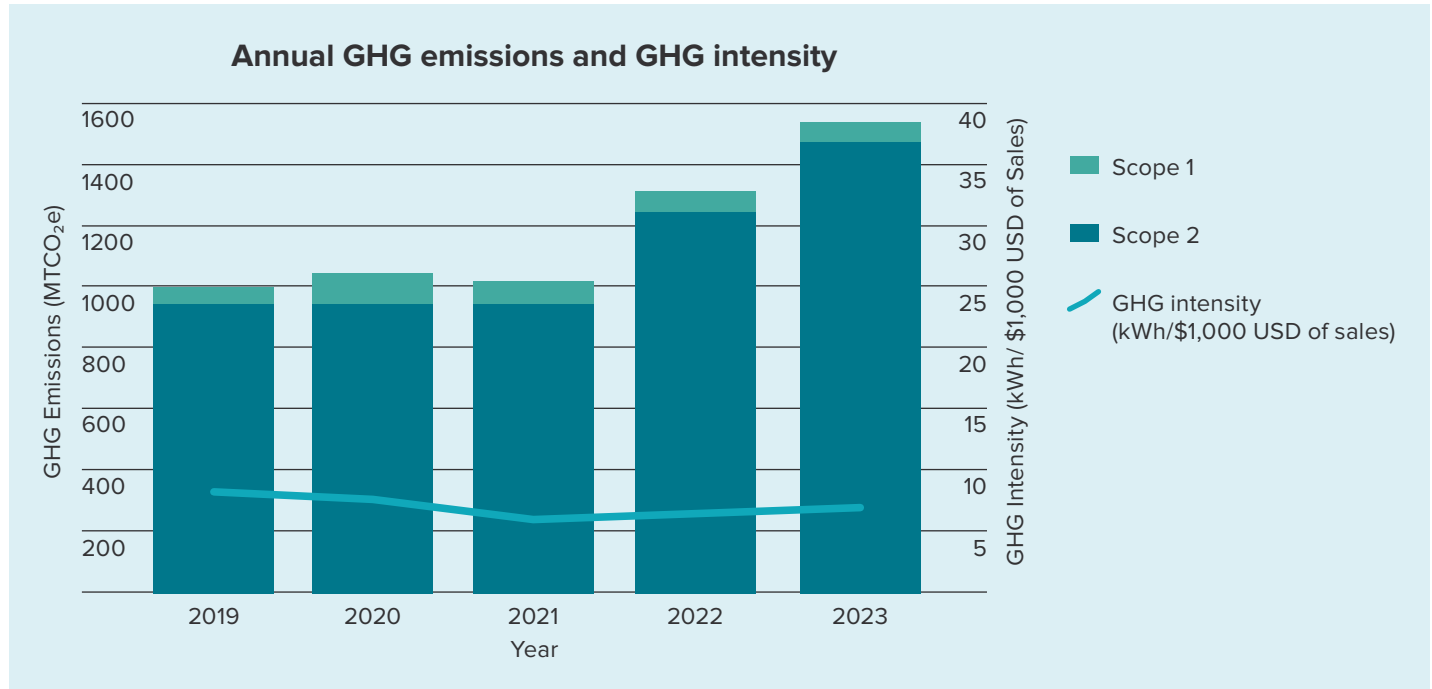
- A 4 GHG emission intensity for 2023, reflecting a modest increase in GHG emission intensity as revenue grew 10%+
- A >55 MTCO₂e GHG emissions avoidance through the usage of our employee vehicle charging stations

METRIC	2019*	2020**	2021**	2022**	2023**
Gross direct (Scope 1) GHG emissions (MTCO ₂ e)	53	67	64	63	59
Indirect (Scope 2) GHG emissions (MTCO ₂ e)	948	951	945	1,238	1,483
Total GHG emissions (MTCO ₂ e)	1,001	1,019	1,009	1,301	1,542
Total net sales (USD rounded)*	\$150,200,000	\$163,500,000	\$230,500,000	\$284,400,000	\$322,400,000
Total GHG intensity (kg CO ₂ e/ 1,000 USD in sales)	6.7	6.2	4.4	4.6	4.8
Y-O-Y Total GHG intensity percent change		-6%	-29%	4%	4%

*2019 data includes US facilities (Monrovia, Lake Forest, Aliso Viejo, Tustin), Switzerland facility (Nidau), and Japan facilities (Ichikawa and Urayasu).

**2020, 2021, 2022 and 2023 data include the same facilities as 2019 plus Brugg, Switzerland.

The following chart graphically represents the data in the previous table. GHG emissions in MTCO₂e (left axis) by Scope 1 and Scope 2 are represented by the bar graph, while the line graph overlay represents GHG intensity (right axis). As the graph illustrates, even with production increased, our overall GHG intensity remained relatively stable—and Scope 2 emissions increased due to this increase in overall production, Scope 1 emissions decreased by about 3%. The stable total GHG intensity from 2021 through 2023 reflects our ability to manage our GHG emissions relative to our increase in revenue.



**GHG Calculation from: www.epa.gov/energy/greenhouse-gas-equivalencies-calculator



We designed our Precision Manufacturing Center of Excellence in Lake Forest, as well as the updates to our Monrovia facility, with utilization of renewable energy as a factor. We are continuing to look for ways to support the global transition to a low-carbon economy.

Mobility and Commuting

In 2023, we encouraged our employees to utilize the vehicle charging stations, implemented in 2022, for electric vehicle drivers in our Tustin and Lake Forest facilities to promote the switch from fossil fuels and to reduce GHG emissions from employee commuting. A summary of the GHG savings impact is highlighted below:

	2022 Monthly average	2022 Totals	2022 MTCO ₂ e savings*	2023 Monthly average	2023 Totals	2023 MTCO ₂ e savings*	Percentage change in MTCO ₂ e savings
GHG savings (kg)	1,026	12,316	-32	1,860	22,326	-59	Approx. 80% increase in GHG savings
Gasoline saved (gal)	306	3,681		5,583	6,670		
Charging hours (hrs)	484	5,808		949	11,389		

*<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results>

By using STAAR provided solar-powered vehicle charging stations, our employees eliminated greater than 6,500 gallons of gasoline in 2023, which is equivalent* to:

- >65,000 pounds of coal burned
- >950 sequestered trees CO₂ over 10 years
- 20 tons of diverted landfill waste
- >7,000,000 smartphones charges

**<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results>*

Fleet Management

The year 2023 was the first full year of utilizing our electric vehicle (EV) for transport needs in Switzerland that were previously handled with a gas-powered vehicle. No gas-powered vehicles came off lease in 2023, and so no additional EVs were brought into service. In the future, as gas-powered vehicles come off their leases, we intend to replace them with zero-carbon vehicles.

Our typical delivery vehicle travels more than 13,500 kilometers per year. By switching to an EV, we are able to eliminate greater than 480 gallons of gasoline per year, which is equivalent* to:

- >4,500 pounds of coal burned
- >70 sequestered trees CO₂ over 10 years
- 1 ton of diverted landfill waste
- >520,000 smartphones charges

**<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results>*

Event Management

Our European and global events team proactively initiated the tracking of our carbon footprint for STAAR Surgical customer events using the advanced measurement tool TRACE. These efforts have established a baseline for these events, enabling STAAR to monitor our CO₂e impact and plan for upcoming events.

As a pilot, we tracked the four separate events held in the Dominican Republic, the United Kingdom, Switzerland, and Austria.

The following table shows the results of the TRACE analysis:

	Number of Attendees	Total Emissions (tCO ₂ e)	Average Emissions per Attendee (kgCO ₂ e)	Major Source of Emissions
Distribution meeting, La Romana, Dominican Republic	>15	>20	>1,400	1. Attendee travel 2. Hotel accommodation 3. Mains electric and gas
User meeting, London, UK	65	10	>150	1. Attendee travel 2. Trucking and shipping 3. Mains electric and gas
EYES 2023, Biel, Switzerland	>35	>10	>300	1. Attendee travel 2. Catering 3. Mains electric and gas
ESCRS 2023, Vienna Austria	>340	>105	>1,600	1. Attendee travel 2. Production material use 3. Trucking and shipping

STAAR INSIGHT



Environmental sustainability and diversity are not mere ideals; they are the cornerstones upon which our future rests. As a parent, my dedication to preserving a planet that flourishes for my daughter and future generations runs deep. It is essential that we value and safeguard our environment for its intrinsic worth, while also celebrating the strength found in our diverse human tapestry. By embracing these principles harmoniously, we chart a course towards a more luminous, inclusive, and sustainable world that benefits every individual and community.”

Paula Ommerli-Weber

Senior Manager International Product Operations, Nidau, Switzerland

GRI 306: Effluents and Waste—Waste Management

Hazardous Waste Disposal

We monitor our hazardous trash and electronic waste streams. In accordance with the California Electronic Waste Recycling Act of 2003 (SB 20), we continue to work with our information technology (IT) department to manage electronic trash and to cooperate with vendors for proper management, disposal, and recyclability. In accordance with regulatory approvals, authorized vendors transport our hazardous waste to a facility for treatment, storage, and disposal.

METRIC	2020	2021	2022	2023
Total hazardous waste generated*	20 tons	33 tons	34 tons	63 tons

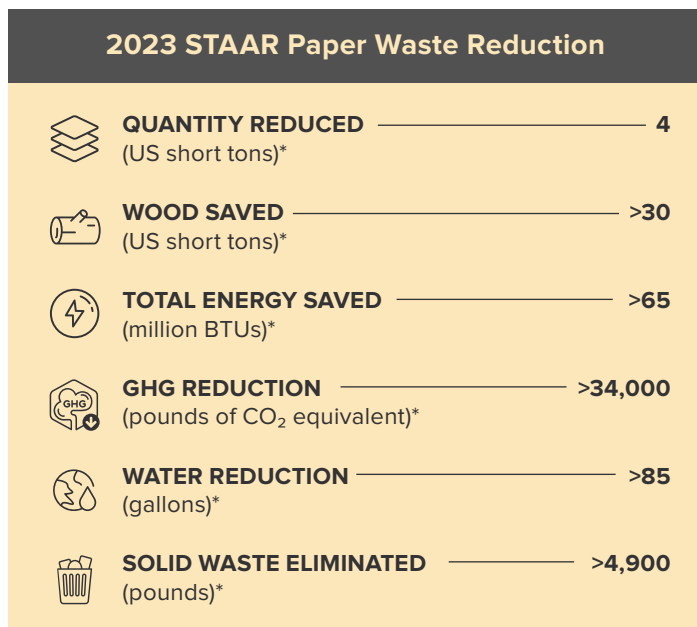
As the table shows, our total hazardous waste generated in 2023 increased by approximately 85% over 2022. This increase is due to expiring manufacturing materials purchased during the COVID supply chain constraints to assure adequate production materials were available during the pandemic.

In 2023, we had zero occurrences of hazardous waste and environmental non-compliance.

Paper to Electronic

As part of our commitment to improving our waste management practices, we continued to increase our usage of electronic documents. We took steps to reduce our paper use in 2023, and in 2024, we expect to further reduce our use of paper as we migrate to a new ERP system, which will allow us to implement electronic purchase orders and invoicing. We continued our efforts in our electronic Directions for Use (eDFU) in markets where eDFUs are allowed. Our packaging contains the ISO symbol with our eDFU website address where customers can access the appropriate eDFU.

The following table shows the documented actual impact of our paper waste reduction efforts as it pertains to eDFU in 2023:



*Based on the *Environmental Paper Network Paper Calculator*

GRI 303: Water and Effluents—Water Usage

STAAR has made progress in understanding both our water footprint and the effects that water availability risk may have on our business operations. Our manufacturing and primary facilities' water supply sources were evaluated in 2020. While most of the water we use comes from local suppliers, in some cases, it must travel across watersheds before it reaches our faucets. We continue to be careful and sensible with how much water we use, especially in regions with severe water shortages, like Southern California.

The table below details the water risk for each of our major locations based on the Water Resource Institute Aqueduct Tool Database.

FACILITY	Water source	Water risk*
Monrovia, CA, USA	San Gabriel Basin	High
Lake Forest, CA, USA	Orange County Groundwater Basin/ Colorado River	Extremely high
Aliso Viejo, CA, USA	Moulton Niguel Water District	Extremely high
Tustin, CA, USA	Groundwater Colorado River	Extremely high
Ichikawa, Japan	Arakawa/Tamagawa	Low-medium
Brügg, Switzerland	Rhine Basin (Aare)	Low
Nidau, Switzerland	Rhine Basin (Aare)	Low

**World Resource Institute: Aqueduct Water Risk Atlas*

We seek to incorporate water-saving and water-stewardship methods into our daily operations as we continue to build on our current projects. We strive to stay informed about the areas with scarce water supplies to help us do our part to conserve one of our most precious resources.

In 2023, we increased our estimated water usage to approximately 12,430 cubic feet, which is about 1% increase over 2022. This is due to the increase in manufacturing in our California facilities to support our business growth. While water usage has increased, the overall water usage intensity (ft³/\$1,000 USD) continues to decline, demonstrating our continued conservative approach to water usage.

METRIC	2021	2022***	2023
Estimated* total water withdrawn** (cubic feet – ft³)	761,152 ft ³	917,120 ft ³	929,550 ft ³
Percentage of locations** in high or extremely high-water risk	57%	57%	57%
Water use intensity (ft³/ \$1,000 USD in sales)	0.33	0.32	0.29
Number of incidents of water-related non-compliance	1	0	0

* Water usage, not able to be directly obtained from meter reading on utility billing, was estimated.

**Includes our US facilities (Monrovia (Walker), Monrovia (Royal Oaks), Lake Forest, Aliso Viejo, Tustin), two Swiss facilities (Nidau, Brügg), and one Japanese location (Ichikawa).

*** Water was incorrectly reported in 2022 and has since been corrected.

Employee Well-Being, Diversity, Equity, & Inclusion

GRI 400: Social

At STAAR Surgical, we continue to prioritize the safety, well-being, and professional development of our employees, recognizing that they are the cornerstone of our success. As we present this section of the 2024 Sustainability Report, we reaffirm our commitment to creating a safe and healthy workplace that values diversity, equity, and inclusion. Our efforts this past year have been focused on integrating the unique perspectives of our diverse workforce into our business, so that we remain a leader in the industry.

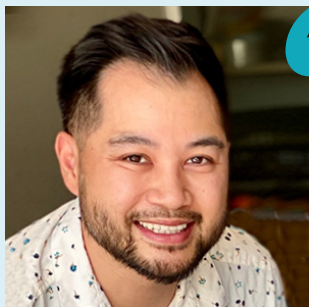
This year, we have made notable advancements in several areas, reinforcing our dedication to our corporate values, as we continue to grow our company.

Employee well-being, diversity, equity, & inclusion highlights include:

- Achieving a significant reduction in health and safety incidents per employee in 2023 to 1.46 while increasing total hours worked by 30%+, showcasing the effectiveness of our enhanced training and proactive safety measures
- Expanding skills training for employees that provided opportunities for professional growth and staying at the forefront of industry trends, with 10%+ of eligible employees participating in the first year
- Attaining 100% compliance with mandatory training in 2023
- Reducing our 2023 employee turnover by 20%+ from 2022
- Empowering local sites to develop their own diversity-month events, demonstrating our commitment to celebrating cultural diversity and fostering an inclusive work environment

These achievements reflect our ongoing commitment to our employees, the communities we serve, and our broader social responsibilities.

STAAR INSIGHT



As an employee at STAAR taking a leadership role in our ESG efforts, I am proud to witness the remarkable commitment of our organization to the empowerment, well-being, and professional development of our employees.

STAAR's dedication to providing opportunities for growth and staying at the forefront of industry trends reflects not only our corporate values but also the recognition of employees as the cornerstone of our success.

Our employees are committed to fostering an inclusive work environment that celebrates diversity and the safety and security of our workforce. These achievements are a testament to our ongoing commitment to employee well-being, development, and our broader social responsibilities."

Phuong Nguyen

Senior Director, Global HR Operations

GRI 103: Management Approach

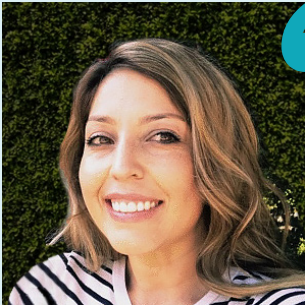
Corporate Values

Corporate values are the guiding principles that shape a company's culture, decision-making, and behavior. Corporate values help build a strong organizational culture, attract and retain top talent, and drive business success.

As we continue to champion the High Performance Management System at STAAR and the benefits it can provide, we refined our “corporate success tree” to reflect five corporate values that reinforce our commitment to creating a positive work environment, fostering employee engagement, and driving business growth based on our shared commitment to STAAR’s mission. These values are:

- **Empowerment:** We encourage and enable those closest to the activity to make decisions through agreed processes and procedures
- **High Speed of Execution:** Act urgently and don’t let perfect be the enemy of good enough
- **Accountability:** We operate with the highest levels of integrity and do what we say we are going to do
- **Global Mindset:** We consider all geographies and cultures in our plans, processes, and actions
- **Fun:** We choose a positive, sometime humorous, and respectful attitude every day

STAAR INSIGHT



Occupational Health and Safety (OHS) is important to me as it directly impacts the well-being and safety of our employees, and I have the opportunity in my position to continuously elevate STAAR's impact in a positive way.

The well-being of our employees is a top priority. OHS is personal to me because I believe that everyone deserves to work in an environment that minimizes risks and promotes physical and mental health. Personally, I am invested in ensuring that every member of our company has resources by reaching out to our HR team in regard to a healthy workplace environment at STAAR.

STAAR's focus on occupational health and safety is particularly meaningful to me. It aligns with my goal of fostering a workplace culture that prioritizes employee welfare. When a company like STAAR places emphasis on OHS, it demonstrates a commitment to creating a safe environment for its employees. This not only resonates with my personal values but also makes my role in ensuring employee satisfaction and well-being more achievable.

STAAR's commitment to OHS is advantageous for the company as a whole. A strong focus on it enhances employee morale and engagement, which can lead to increased productivity and fostering long-term employees.

By proactively addressing safety concerns, STAAR is creating a sustainable and resilient workforce, which ultimately contributes to the overall success and longevity of the company. I see STAAR's dedication to OHS as an integral part of our goal to build a healthy, motivated, and high-performing team.”

Michelle Ramirez

Manager, Human Resources

GRI 403: Occupational Health and Safety

Occupational Health and Safety

We aim to provide our employees with a safe and secure work environment where they can thrive. As our business continues to grow, we welcomed over 160 new full-time employees in 2023. We are committed to a culture that prioritizes health and safety. We provide mandatory training to all new hires in alignment with our internal health and safety protocols. We consistently conduct refresher health and safety training sessions and emergency response drills to keep our employees well-prepared and safe in the event of an emergency. Additionally, we plan for business continuity with our on-site personnel, so that we optimize for normal operations even during challenging times.

The Health and Safety Committee in our Southern California facilities is a dynamic team of more than 20 managers and employees from various departments. They come together regularly to champion safety and seek to make our workplace an accident-free zone. Through quarterly facility inspections, detailed documentation, and proactive corrective action plans, they endeavor to keep safety a top priority. Our safety-related inspections, documentation and corrective-actions plans are retained in our Computerized Maintenance Management System, where completions and approvals are tracked and maintained.

Moreover, we carry out comprehensive assessments of the work environment to identify potential hazards and introduce appropriate safety measures. We monitor the effectiveness of our safety protocols through regular inspections and audits. In the event of any workplace accidents, we investigate to determine the underlying causes and take corrective actions accordingly. We actively involve our team in the development and maintenance of our health and safety programs and training, thus promoting a robust safety culture. We encourage open communication and value feedback from all employees, as it helps us to continuously improve our safety policies, programs, and overall safety culture. Safety is also integrated into our annual employee performance evaluations, and applicable employees are evaluated on their adherence to safe and healthy work practices.

To assess the effectiveness of our program and training, we monitor our health and safety metrics. In 2023, our Total Recordable Incident Rate (TRIR) and Days Away, Restricted, or Transferred (DART) were 1.46 and 1.13, respectively. Although the Bureau of Labor Statistics (BLS) industry data for 2023 is not yet available, the industry metrics for 2021 are the most current available as BLS industry average TRIR and DART are published biennially. Our health and safety metrics demonstrate that our employees are knowledgeable about safe work practices and are taking the necessary measures to maintain a secure working environment.

METRIC*	2021	2022**	2023
Total recordable incident rate (TRIR)	1.30	2.37	1.46
BLS industry average TRIR*** (external source)	2.1	Biennial number	Not available at time of report publication
Days away, restricted, or transferred (DART)	1.30	2.15	1.13
BLS industry average DART*** (external source)	1.4	Biennial number	Not available at time of report publication
Injuries	5	11	9
Hours worked	769,075	928,882	1,235,559

*US Data only.

** Internal review indicates the increase in TRIR and DART in 2022 is due to the rapid hiring and increase in hours worked (a 20%+ increase in hours) combined with limited outlier cases, which skewed overall results.

***The use of industry benchmarks is important to measure our performance. These industry numbers are biennial and apply to work-related injuries and illnesses involving stays away from work, restricted activity, or job transfer. We are currently working with our broker on these particular positions to lower our DART rate.

(2021) data: TABLE 1. Incidence rates of nonfatal occupational injuries and illnesses by industry and case types, 2021 : US Bureau of Labor Statistics (bls.gov).

(2022) data: TABLE 1. Incidence rates of nonfatal occupational injuries and illnesses by industry and case types, 2022 (bls.gov).

We are mindful of our employees' safety during the manufacturing of our medical devices.

The Workers' Compensation Insurance Rating Bureau of California assessed STAAR with an Experience Modification Rate (EMR) of 57% which is better than our target of being under 100%, and better-than-average injury experience of our industry.*

**In California, EMR stands for Experience Modification Rate, which is a rate factor given to eligible employers annually by comparing their three-year loss experience to the average for employers in the same classification. This is part of California's workers' compensation experience rating system, which is intended to provide employers with a financial incentive to reduce workplace injuries and illness. EMR is used by insurance firms to price the cost of workers' compensation premiums. Any rating under 100% qualifies a company for discounted premiums.*

GRI 401: Employment

Talent Engagement and Retention

We prioritize investing in the growth and development of our employees. We understand the importance of providing opportunities for professional development and continuous learning. That's why we offer a range of training programs and resources to help our employees enhance their skills and knowledge.

We also value the well-being and satisfaction of our employees. To gauge the satisfaction and motivation of our workforce, we regularly conduct employee satisfaction and engagement surveys. These surveys serve as a valuable feedback mechanism, allowing us to assess the overall work environment and identify areas where we can make improvements. By actively seeking the input of our employees, we are able to create a company culture that fosters productivity and engagement. Their valuable insights help us shape our policies and practices to create a more positive and fulfilling work environment.

Mandatory Employee Training

In 2023, we continued to make improvements to our mandatory employee training for all new and existing employees. Our employees are now required to complete online training on Hazard Communication and Bloodborne Pathogen. Additionally, we provide training to emphasize our dedication to maintaining an inclusive and welcoming workplace. This includes training on our **Code of Business Conduct and Ethics**; anti-harassment; Diversity, Equity, and Inclusion; and **Human and Workforce Rights Policy**. Our objective is to provide our employees sufficient knowledge and skills to uphold a safe and inclusive work environment. We are committed to adhering to the evolving standards and regulations set by the Occupational Safety and Health Administration and local authorities to safeguard our employees' well-being and provide them with top-quality resources for training.

COURSES	2021 Hours of training*	2021 Percentage of employees assigned**	2022 Hours of training*	2022 Percentage of employees assigned**	2023 Hours of training*	2023 Percentage of employees assigned**	Percentage of change in training hours
Hazard Communications (global)	74	100%	89	100%**	2,135	100%**	2,299%
Bloodborne Pathogens and MRSA (US)	74	100%	89	100%**	230	100%**	158%
Code of Business Conduct and Ethics (global)	178	88%	216	100%**	567	100%**	163%
Avoiding Insider Trading (global)	92	93%	216	100%	567	100%**	163%
Preventing Discrimination and Harassment for Employees (global)	77	63%**	431	100%**	115	100%**	-73%***
Preventing Discrimination and Harassment for Managers (global)	20	91%**	218	100%**	40	100%**	-82%***

* Data is for US employees.

** 2021, 2022 and 2023 percentages of employees apply to new hires, not all employees.

*** The increase in 2022 training hours is due to the requirement to train California based managers every two years.

In 2023, we also introduced several new mandatory training courses globally, enabling a standard vocabulary and consistent employee experience across all regions. New courses include:

COURSES	2023 Percentage of employees assigned*
New Managers (CH and JP)	100%
Quality Training (for all CH employees)	100%
Access to Master Control, Good Documentation Practices (CH)	100%
HR Procedures (CH)**	100%
Manufacturing Safety and Control (CA)***	100%

* 2023 percentages of employees apply to new hires, not all employees.

**SOP-0100 Recruitment, SOP-0103 Performance Review, and SOP-0221 Competence, Awareness and Training.

***This includes the following topics: management control, complaint handling, adverse events and product/patient safety awareness, document and data control, standards and requirements training: software as a medical device, design control, root cause investigation and CAPA, standards training: biocompatibility requirements for STAAR products, production/process control, facilities/equipment control and material control, standards training: sterilization requirements.

Professional Development Employee Training

In 2023, we expanded our employee professional development training program to enable all employees to continue to grow their professional skills by offering online classes free of charge. As a cornerstone of our employee empowerment, these classes empower our workforce to enhance their professional skills and advance their careers. Through a diverse range of courses, we offer our employees the opportunity to develop the skills and knowledge necessary to thrive in a rapidly evolving work environment. Our program is designed to be inclusive and adaptive, catering to the individual learning needs of our employees. We also provide access to external platforms such as LinkedIn Learning to offer specialized courses, keeping our workforce at the forefront of industry trends. By investing in the continuous development of our employees, we not only support their personal growth but also contribute to the long-term success and sustainability of our organization.

COURSES	Number of employees	2023 Hours of training	2023 Percentage of eligible employees
Workbook—Word	>95	>45	10%+
Workbook— PDF	>95	>45	10%+
Microsoft Excel 365—Entering and Editing Data	>90	<5	10%+

Other course offerings include: 10 Minute Pandemic Awareness, Managing Up, Career Development: Moving Up the Ladder.

Employee Benefits

Beyond salaries, we provide additional compensation and benefits programs (which vary by country) such as cash bonuses, stock-based awards, and 401(k) plans. In the US, all full-time employees are eligible to receive the following benefits:

- Health insurance (medical, pharmacy, dental, vision)
- Flexible Health Savings Accounts (FSA) and wellness programs
- Health fair
- Annual on-site flu vaccinations
- Employee Assistance Program (EAP)
- On-site gym at our Lake Forest and Monrovia (Royal Oaks) locations
- Disability and life insurance
- Legal services
- Training/development/certification reimbursement
- Vacation, holidays, sick time, bereavement, and jury duty
- Three annual floating holidays
- Employee charitable matching
- Adding a high-deductible PPO and Health Savings Account (HSA) option in 2024
- Enhancing our Paid Sick Leave Policy to increase available hours by increasing available hours by 50% for all employees, in 2024

In 2023, our overall turnover rate in the US was less than 10%, which reflected a decrease of approximately 4% from 2022. We are proud that our turnover rate is significantly below the medical device industry's overall turnover rate of approximately 23%. We believe in the culture we have established at STAAR, and we strive to recruit and hire employees who reflect the communities where we operate. Our below-industry-average turnover rate is a testament to our corporate culture, our effective recruitment and hiring practices, and our ability to offer a motivational work environment that fosters strong employee retention.

METRIC*	2021	2022	2023
Employee turnover rate (US)*	9%	11%**	8%
Industry average employee turnover rate*** (external source)	18%	23%	23%
Employee turnover rate (global)	N/A	N/A	13%
Industry average employee turnover rate (global)**** (external source)	N/A	N/A	23%
Average hours of compliance training per year per employee (global unless otherwise indicated)	13*	13*	>10^
Employees receiving regular performance and career development reviews	All employees receive annual performance feedback	All employees receive annual performance feedback	All employees receive annual performance feedback

*US data only for 2021-2022. ^In 2023, we introduced targeted, global compliance training modules with a mix of online, localized (where applicable), live and interactive content.

** Internal review indicates the increase in employee turnover in 2022 is primarily due to the competitive nature of the entry-level employee market in the US. To help alleviate this, we decreased the employee trial period from 90 to 30 days, moving productive employees to permanent employee status and out of temporary employee status sooner.

*** 2023 Aon Radford Salary Increase and Turnover Study—Second Edition Refresh Results (Medical Devices)—US Region Industry Cut.

****2023 Aon Radford Salary Increase and Turnover Study—Second Edition Refresh Results—Global.

GRI 405: Diversity and Equal Opportunity

Diversity and Equal Opportunity

STAAR Surgical is proud to be a diverse company. Our team is made up of individuals from various ethnicities and backgrounds, hailing from across the world. We strongly believe that our diversity is a contributor to our success.

Our 2023 Diversity, Equity, and Inclusion metrics include:

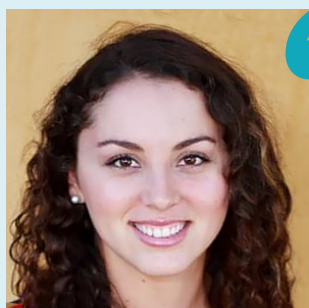
- Approximately 50/50 split in male and female employee population
- 80% of employees from underrepresented populations
- 50% of Board members being female and 50% of the Board members are from underrepresented populations

METRIC	2021	2022	2023
Percentage of male employees	48%	49%	50%
Percentage of female employees	52%	51%	50%
Percentage of employees from underrepresented* populations**	81%	86%	80%
Board diversity	43% female; 29% from underrepresented populations	50% female; 33% from underrepresented populations	50% female, 50% from underrepresented populations
Board member age	Average age is 60 years old	Average age is 58 years old	Average age is 55
Board member tenure	Average tenure is 4.0 years	Average tenure is 3.5 years	Average tenure is 2.5 years
Age globally of employees			• 18–20s: 208 • 30s: 331 • 40s: 237 • 50s: 177 • 60s: 106 • 70s: 3 • 80s: 1

*Underrepresented communities are defined as including persons who self-identify as Black, African American, Hispanic, Latino, Asian, Pacific Islander, Native American, Native Hawaiian, Alaska Native, gay, lesbian, bisexual, and transgender.

**US data only; note that in some regions, ethnicity is not captured.

STAAR INSIGHT



There are so many benefits to a diverse workplace including fostering a positive, inclusive, and fun company culture, talent attraction and retention, and enhanced innovation and creativity. I, personally, have learned so much while being part of the DEI committee and I value the fact that the group itself is a diverse group of employees. STAAR's focus on diversity serves as an advantage and contributes to the company's long-term success."

Venus Morales-Thompson
Manager, Human Resources



In 2023, our Diversity, Equity, and Inclusion Committee continued to drive diversity and cultural efforts throughout the organization. Comprised of a diverse group of STAAR employees, the committee's charter is to recognize and celebrate the diversity of our workforce.

"Diversity, equity, and inclusion matter at STAAR. We aim to provide employees with a work environment that fosters a globally inclusive culture, embracing the diverse nature of our workforce while helping to bring Visual Freedom to the world."

STAAR's Diversity, Equity, and Inclusion Committee



Our company abides by an Affirmative Action and Equal Opportunity Policy statement, which prescribes that we are an equal opportunity employer. We hire, train, promote, compensate, and take all other employment actions without discrimination based on gender identity, race, color, religion, national origin, ancestry, age, sexual orientation, marital or family status, disability, veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations.

Celebrating Diversity

In our efforts to support diversity, equity, and inclusion at work, we acknowledge and honor a range of holidays and cultural events. These celebrations serve as a valuable platform for our employees to share and educate others about the significant aspects of their respective cultures, thereby fostering an environment that encourages collaboration and understanding.

In 2023, we celebrated a range of events, including the Lunar New Year, Black History Month, Juneteenth, Hispanic Heritage Month, Mid-Autumn Festival, and Global Diversity Month. By celebrating our differences and common interests, we aim to unite and build a more inclusive workplace. Two of these events are highlighted below.

Celebrating Diwali

Diwali is an annual Hindu festival that commemorates new beginnings, the triumph of good over evil, and the welcoming of the Hindu New Year. It is commonly referred to as the "festival of lights" and is observed for five days in India and Indian communities worldwide. The festivities comprise lighting lamps, embellishing homes, engaging in shopping, igniting fireworks, offering prayers, partaking in lavish meals, exchanging gifts, and sharing sweets with family and friends. One of the customs involves performing worship rituals for Lakshmi, the goddess of prosperity and wealth. Diwali was observed on November 1, 2023.

STAAR INSIGHT



Diversity is a tool and resource that enables us to adapt to change. It fosters tolerance, promotes resilience, and facilitates adaptation to new circumstances. Celebrating Diwali provides a framework for understanding the world and feeling closer to the person next to you. It's a time for engaging in meaningful discussions that respect and honor cultural differences.

As a woman and a minority, STAAR's focus on diversity has made me an inclusive leader, bridging representation gaps at influential positions and inspiring me to dream bigger while challenging systemic biases. It taps into a wealth of diverse perspectives, fostering innovative ideas for STAAR's success.

STAAR's inclusive environment enables all employees to feel comfortable sharing our own unique perspectives, which translates into creative and productive teams, enhanced employee engagement and a competitive advantage in attracting and hiring the best candidates."

Pavithra Ramamurthy

Director, Business Intelligence, USA

Celebrating Global Diversity Month

October marks the observance of Global Diversity Awareness Month, an occasion dedicated to recognizing and appreciating individuals from various ethnicities, cultures, genders, and abilities. It serves as an opportunity to celebrate the immense value that diversity brings to our global community and society, while also emphasizing the importance of respecting and accepting all people.

The origin of Global Diversity Awareness Month can be traced back to the end of World War II, when the Universal Declaration of Human Rights was adopted by the United Nations General Assembly in Paris. This significant declaration established the fundamental rights and freedoms that every individual is entitled to, thereby establishing a framework for the protection of human rights.

To honor Global Diversity Awareness Month, STAAR commemorated this event on a global scale during the week of October 23–27. Each participating site was empowered to organize their own unique celebration aimed at promoting diversity and inclusion, thus fostering a culture that values and embraces the differences among individuals.

STAAR INSIGHT



Diversity is crucial as it brings together a variety of perspectives and enriches our understanding and creativity. Celebrating Diversity Day helps us connect with different cultures and appreciate each other. STAAR's commitment to diversity has enhanced my work experience and fostered collaboration among unique individuals. Events like Diversity Day create a sense of belonging and strengthen our team's cohesion and productivity."

Jacky Hernandez
Recruiter, USA

STAAR INSIGHT



Diversity is essential in the workplace as it helps us understand the varied cultures, beliefs, and customs of our colleagues, fostering a truly global community under one roof. Celebrating events like Diwali at our Delhi Office is significant; it brings us closer, allowing us to revel in the festivities collectively. STAAR's commitment to diversity instills a sense of inclusion, bridging the distance to our parent company and reinforcing our unity. Moreover, STAAR's emphasis on diversity signals to newcomers that they will be embraced regardless of color, creed, or ethnicity, which is fundamental to our company's ethos and success."

Avneet Jaiswal
Zonal Manager, India

STAAR INSIGHT



Diversity is essential as it brings together a diverse range of backgrounds, experiences, and perspectives, resulting in a more skilled workforce, innovative ideas, and continuous mutual learning. Observing diversity through events such as diversity week is crucial; it provides an opportunity for everyone to learn about and appreciate their colleagues' unique cultures."

Lalaina Holivololona
Quality Engineer Microbiology, Switzerland

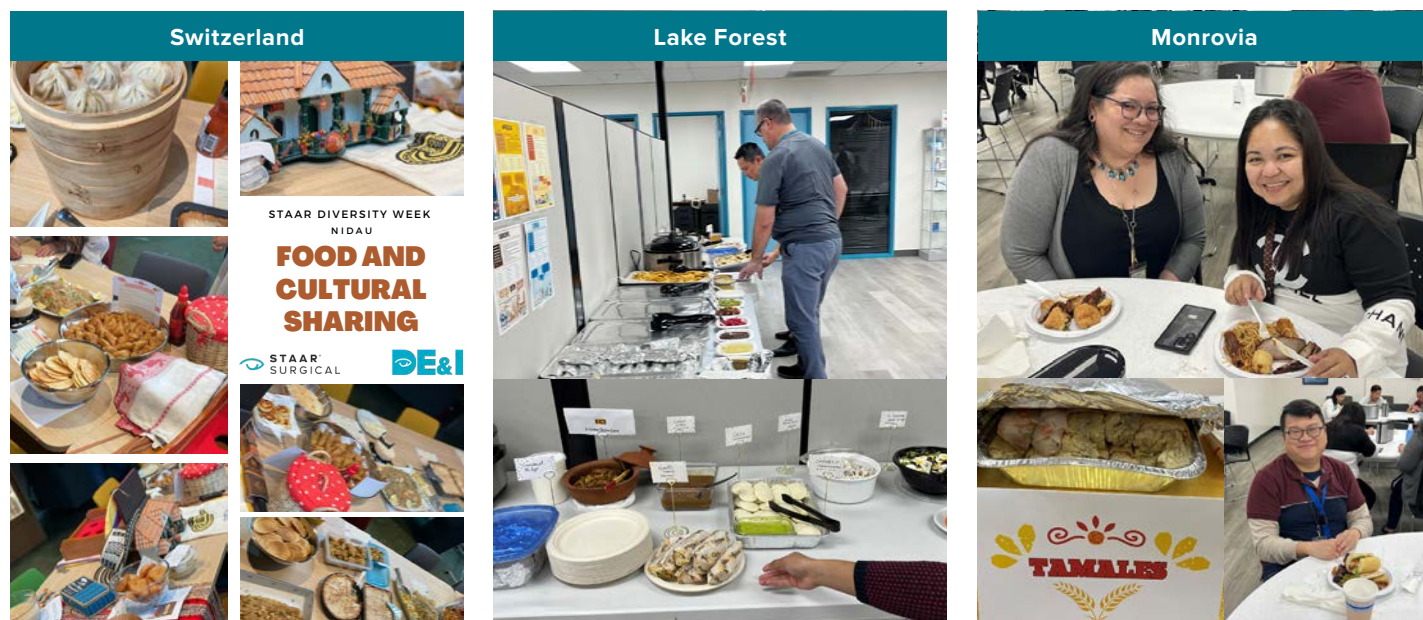
STAAR INSIGHT



STAAR's dedication to diversity makes me feel valued, appreciated, and included, enabling me to embrace my identity and heritage without fear of judgment. This emphasis on diversity at STAAR fosters a friendly and socially inclusive reputation, cultivating a positive work environment where employees are motivated to excel and give their best."

Saffrin Naicker
Quality Assurance Engineer, Switzerland

The sharing of food from different cultures provides an opportunity to celebrate and embrace diversity while serving as a unifying force, bringing people together through the joy of culinary traditions. During STAAR's Diversity Week, at our Lake Forest, Monrovia, and Switzerland locations, the exchange of diverse culinary delights allowed employees to connect, appreciate each other's backgrounds, and foster a sense of unity within the global community.



Diversity Training

Beginning in 2022, we partnered with a third-party online training provider to make available numerous training courses in diversity and harassment prevention for our employees. Our mandatory courses include **STAAR Code of Business Conduct and Ethics ("Code of Conduct")**, microaggressions, workplace diversity, and inclusion and sensitivity, among others. Additionally, all employees completed our biannual harassment prevention refresher training.

All employees at or above the manager level all attend a mandatory on-site training session about Diversity, Equity, and Inclusion. This meeting was presented by Sam Gesten, STAAR's retired Chief Legal Officer and Dr. Belinda Johnson White, a retired Morehouse College professor and subject matter expert in DEI.

Our goals are to foster a more inclusive workplace and to create an atmosphere where everyone is treated with respect and fairness regardless of their identity. We believe that these training courses, along with follow-up conversations, will help us continue the progress we have made. Moreover, respect is one of our corporate values, and we remind employees to live our values.

GRI 412: Human Rights Assessment

Human Rights

Fostering human rights takes many forms at STAAR and is reflected in our policies and initiatives in areas that include workplace inclusion, employee safety, supplier engagement, **Equal Opportunity Policy Statement**, and our **Code of Conduct**. All new employees are trained in our **Code of Conduct** at hire, and we conduct regular refresher training through the company's Learning Management System.

Policy Commitment

The **Code of Conduct** mandates that our workforce, executives, and directors act ethically, with integrity, and in compliance with all applicable laws and regulations at all times. Similarly, our **Supplier Code of Conduct** outlines the expectations we have for our suppliers.

Our **Human and Workforce Rights Policy** outlines our commitment to respecting international human rights principles, including the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

Grievance Mechanisms

At STAAR, we hold ourselves to high standards of business ethics and integrity. We are committed to complying with all laws that affect our business and directing our employees to do the same. To help maintain compliance, we have established an Employee Compliance Hotline that is available to our employees globally. This hotline is designed to allow employees to report any suspected violations of laws, rules, or regulations, as well as illegal conduct or potential violations of STAAR policies and procedures. We require our employees to report any suspected violations to their supervisor, a member of the company's legal department, or through the hotline. By regularly training on and living the principles of STAAR's **Code of Conduct**, we motivate our workforce to conduct business with honesty and integrity.

Philanthropy and Community Service

GRI 413: Local Communities

Over the past year, we have focused on actively engaging our employees in various philanthropic and community service opportunities. Our programs, which include financial donations, in-kind donations, and employee volunteer programs, have not only allowed us to make a positive impact on the communities where we operate but have also contributed to the overall well-being of our employees. Recent research has shown that company-sponsored philanthropic and community service efforts can lead to increased employee satisfaction, higher retention rates, and improved overall well-being.

In 2023, we focused on enabling employee participation in charitable and community philanthropic activities. We fully launched a Global Employee Charitable Matching Program that was piloted in 2022, enabling employees to have their charitable contributions matched by the company. Additionally, STAAR launched a program for employees to volunteer at local, not-for-profit organizations closer to their physical work location, expanding the opportunities for staff to engage in meaningful volunteer work.

By reaching out to our employees for philanthropic and community service suggestions, the company brought community service directly to the employees and provided financial sponsorships to charities near and dear to our employees and local communities. In 2023, we:

- Held Red Cross blood drives at the Lake Forest and Monrovia locations, which facilitated >60 volunteers to participate during office hours
- Set up donation barrels for Toys for Tots in our Monrovia (Walker), Monrovia (Royal Oaks), Lake Forest, Alisio Viejo, and Tustin locations resulting in over 200 toys donated

STAAR INSIGHT



I am thrilled to share that in 2023, we achieved remarkable results in our philanthropic initiatives, including a substantial increase in employee volunteerism and the launch of our Global Employee Charitable Matching Program.

We are extremely humbled by our STAAR employees' commitment to their communities and our mission of Visual Freedom. It shows that when you provide the opportunity for your employees to engage in philanthropic and community service activities, people do what's in their hearts.

Our goal for 2024 is to build on this success and further elevate employee engagement, making an even greater impact on the communities we serve."

Heather Ready

Senior Director, Global Market Intelligence

- Sponsored \$25,000 to The Fallen Firefighter Relief Fund of Orange County
- Raised over \$21,500 for food donations to the Los Angeles County and Orange County food banks, including over \$11,500 from employee contributions and approximately \$10,000 from Corporate Matching

In 2024, we look forward to continuing to enable our employees to engage in community service that is important to them, and to continuing to grow with our community partners to support Visual Freedom.

Philanthropy and community service highlights include:

- The first full year of our employee charitable matching program resulting in >60 charitable organizations supported through financial contributions
- Approximately \$65,000 in total financial donations, which is equivalent to over \$300 USD per employee
- An over 100% increase in employee volunteerism

Employee Engagement

As we continue to expand our philanthropic and community service programs, we will track both financial contributions and employee-donated time. In 2023, we focused on employee engagement. We looked to provide more opportunities for our employees to not only participate in STAAR sponsored events, but to contribute to and volunteer for activities with an organization they are passionate about.

As a result, overall employee participation and contributions to all charitable efforts increased substantially in 2023. By opening new channels for our employees to volunteer and support the broader community, the number of organizations supported through financial contributions increased to 63 with an increase of employee participation by over 100% over 2022.

METRIC*	2021	2022	2023	% Year-over-year increase
Number of employees who volunteered	38	79	160	103%
Number of employee volunteer hours	150	405	506	45%
Number of charitable organizations supported through financial contributions	6	6	63	950%

*US data only.

Global Employee Charitable Matching Program

The highlight of our 2023 philanthropic and community service efforts was the launch of our Global Employee Charitable Matching Program. In 2022, we had a limited pilot.

The program encourages our employees to contribute to causes that are important to them and their individual communities. STAAR supports the philanthropic efforts of our employees by matching—dollar for dollar—the amount that the employee contributes.

During the fall and winter holiday seasons in Southern California, through our sponsored matching fundraising program for the Orange County Food Bank and the Los Angeles County Food Bank, we raised a total of over \$21,500, including over \$11,500 from employee contributions and approximately \$10,000 from Corporate Matching. Every dollar donated was equivalent to four meals. Our employees donated approximately above 86,500 meals!

How the Matching Program Works

When a STAAR employee makes a direct donation to a qualified, non-profit organization of their choice through the Global Employee Charitable Matching Program, STAAR helps them make an even bigger impact by matching their contribution dollar-for-dollar up to the program limit. For example, if an

employee donates \$100 to a qualified charitable organization such as UNICEF, then STAAR matches the donation, giving \$100 to UNICEF (totaling \$200).

Eligibility for Charitable Matching Program

An organization is eligible if it is a qualified, non-profit charitable organization (with a 501(c)(3) tax designation in the US, and with similar tax-exempt status internationally).

Organizations that discriminate based on race, religion, creed, gender identity and/or expression, sexual orientation, age, disability, or national origin are ineligible.

Donations that will benefit a particular individual(s) (including requests to non-profit charitable organizations directly or indirectly for the benefit of current or prospective customers) are ineligible.

Commitment to Visual Freedom

We are committed to serving our local communities. In 2023, we were proud to continue our relationship with Beyond Blindness through both financial contributions and volunteerism. Beyond Blindness is an organization that provides therapy, education, enrichment, and support to children with visual impairments and their families. In 2023, STAAR employees volunteered and participated in eight Beyond Blindness events, contributing over 350 volunteer hours.

STAARs volunteering at Beyond Blindness

STAAR Surgical and Beyond Blindness have a strong relationship rooted in their shared mission to improve vision. STAAR's Visual Freedom mission aligns with Beyond Blindness's goal of eliminating blindness and improving vision.

STAAR provides financial support and encourages employee volunteerism to further this mission. The collaboration between STAAR Surgical and Beyond Blindness exemplifies a steadfast dedication to driving positive change in the field of vision care, reflecting a core pillar of STAAR's sustainability efforts focused on philanthropy and community engagement.

8 _____ **Total Number of Events**

350+ _____ **Total Volunteer Hours**

~\$49,000 _____ **Financial Contribution**



You helped us go beyond for nearly 500 children in 2023 and supported Beyond Blindness with an incredible \$354,133 this holiday season.

Because of your generosity, we are ready to embark on another record-breaking year of delivering cutting-edge Early Intervention, Education + Enrichment, and Family Support services to hundreds of families across Orange County."

Angie Rowe

President & CEO, Beyond Blindness



The STAAR team at the Beyond Blindness Vision Beyond Sight Gala.

Gala Event at Marconi Automotive Museum

The Beyond Blindness Vision Beyond Sight Gala, held on March 11, 2023, at the Marconi Automotive Museum, was a fundraising event to support Beyond Blindness' initiatives in Orange County.

The gala featured various activities such as a dinner program, live auction, and a performance by Emmy-nominated actor, singer, entertainer, and author Tom Sullivan, who is blind himself. The evening also included a unique dining-in-the-dark experience, a wine tasting, and keynote speakers.



STAAR employees preparing the beeper eggs to hide

Beeper Egg Event

The Beeper Egg Hunt, held on April 1, 2023, was an inclusive event organized by Beyond Blindness, allowing visually impaired children to participate in an egg hunt using auditory cues. It aimed to provide a fun and accessible experience for children with visual impairment.



STAAR represents at the Dr. Frank Villalobos/Beyond Blindness Fall Golf Charity Classic



STAAR employees and families preparing to walk for Beyond Blindness

Dr. Frank Villalobos/Beyond Blindness Fall Golf Charity Classic at Arroyo Trabuco Golf Club in Mission Viejo

The Dr. Frank Villalobos/Beyond Blindness Fall Golf Charity Classic took place on October 16, 2023, at the Arroyo Trabuco Golf Club in Mission Viejo. The event aimed to raise funds to empower children with visual impairments and other disabilities by supporting a comprehensive journey of care, providing therapy services, counseling, and education.

Destination Independence Walk + Family Fair

The Family Fair/Walk held on June 3, 2023, was the 19th Annual Destination Independence Walk + Family Fair organized by Beyond Blindness, aiming to raise funds to support and expand critical programs and services for the visually impaired.

Amount Raised by STAAR: ~\$7,500



STAAR employees working on tactile Halloween projects with kids for Halloween



The High Sheriff Award by "From Bristol with Love to Ukraine," recognizes STAAR for funding projects that benefit the community



Preparing the distribution of socks to Ukrainian Refugees

STAARs Getting Spooky at Beyond Blindness Family Enrichment Event

On October 25, 2023, Beyond Blindness hosted its yearly family enrichment event at Pretend City Children's Museum. Our STAAR volunteers helped with setting up tactile Halloween projects with the kids.

Stand4Socks

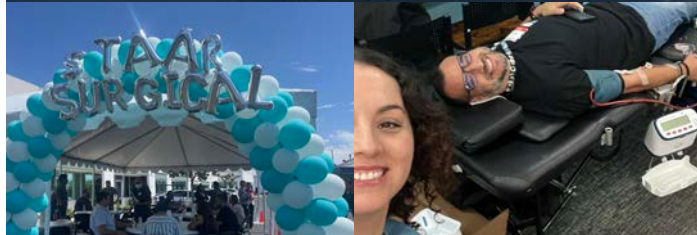
Stand4Socks is a charitable organization that allows companies to donate socks through a buy-one-give-one program. The initiative aims to provide warm socks for those in need. In 2023, STAAR donated 300 pairs of socks purchased through Stand4Socks to "From Bristol with Love" to support Ukrainian families suffering the hardship of war.

Volunteer to Translate Beyond Blindness Materials into Vietnamese

The event "Volunteer to Translate Beyond Blindness Materials into Vietnamese" in 2023 aimed to engage the community in translating Beyond Blindness materials to make them accessible to Vietnamese speakers, furthering the organization's mission of inclusivity and accessibility for the visually impaired.



Various clothing and accessories donated by the STAAR team are available for exchange



Blood drive set at Lake Forest, CA facility

Monrovia site employee donating blood



STAAR team preparing to experience dinner in the dark



STAAR employees preparing and shipping over 100 Christmas packages for Eastern Europe.

STAARs Switzerland Second Life Clothing Exchange

Organizing an employee clothing exchange for business attire and casual wear is a fantastic way to combat clothing waste in our landfills. In Switzerland, our employees brought in their gently used clothing to offer to others, prolonging the life of their garments and minimizing environmental impact. Remaining items were donated to Caritas Charity, a local Swiss charity supporting the community.

Contribution: >55 kg

iAware Dining in the Dark Charitable Event

The iAware Dining in the Dark Charitable Event on May 4, 2023, provided an impactful experience to raise awareness about blindness and visual impairments through the unique experience of dining without sight. The event aimed to support iAware's mission of empowering individuals with visual impairments in Cambodia.

Total volunteer hours: >20 hours

Financial Contribution: ~\$25,000

Red Cross Mobile Blood Drive at Lake Forest and Monrovia Locations

With a Red Cross mobile blood drive, the Red Cross brings the blood donation process to your work facilities.

Total number of events: 2

Total volunteer hours: >70 hours

Christmas Packages for Eastern Europe

The conflict in Ukraine has worsened the economic hardship in Eastern Europe, pushing more residents to the edge of poverty. Christmas parcels from Switzerland are being presented as a gesture of solidarity and gratitude in the midst of a challenging daily life. The joy that these packages filled with food, sweets, hygiene products, school supplies, and toys bring is immeasurable. These parcels are collected by four Swiss aid organizations and distributed to Ukraine, Moldova, Romania, Belarus, Albania, Bulgaria, and Kosovo through local partners.

Target Donation: ~50 Packages

Total Donation: >105 Packages (115%+ of target)

Children Package:

- Chocolate
- Biscuits
- Sweets (candy, gummy bears, etc.)
- Toothpaste and toothbrush
- Soap and shampoo
- Notebooks, pens, pencils, and erasers
- Coloring pens or felt-tip pens
- Toys (puzzles, balls, stuffed animals, etc.).
- Socks, hat, scarf, gloves

Adult Package:

- Flour, rice sugar and pasta
- Chocolate
- Biscuits
- Coffee and tea
- Sweets (candy, gummy bears, etc.)
- Toothpaste and toothbrush
- Soap and shampoo
- Writing paper and pens
- Postcards, candles, matches, string, socks, hats, glove, and scarfs

Contribution in-Kind

In addition to our support for vision foundations and organizations, our corporate charitable giving program allows us to make investments in social betterment. In 2023, we contributed to several non-profit organizations to support children and their families who suffer from visual impairments, and to provide ICL surgeries to those who need them.

Total number of organizations: 5

Total number of donated units: >130

Total value of contribution: ~\$196,000

- Dr. Nathan Henson Project MyVision Peru
- Aloha Laser Vision—Maui relief efforts
- Salus University, Dr. Jim Lewis
- Dr. Jeff Whitsett Donation for charitable work in Argentina
- China Teacher's Program



Dr. Nathan Henson with beneficiaries of STAAR ICL donations

"We were able to help with 70 surgeries' funding. These are some very grateful patients. Thank you again for your partnership in serving the people here in Peru! We are very grateful.

I am sending you here a few pictures of our VERY grateful patients. This has been a total life change for them. Some of them have had prescriptions as high as -11.00 diopters. Really incredible results as well."

Please convey our thanks (and theirs) to STAAR:

Nathan Henson

MD, FWCRC, PGDip CRS, PCEO

Director, La Fuente Centro de Salud Integral Cusco, Peru

Vision-Related Donations

We also support other organizations, foundations, and councils that provide resources to those who need vision care.

Total number of organizations: 5

Total value of contribution: ~\$40,500

- iAware Dinner in the Dark
- Juliette RP Vision Foundation
- Dr. Andrew Sorenson—Hospital Familia Foundation—Guatemala
- Indiana Blind Children's Foundation—Through the Looking Glass Gala
- Night for Sight, Prevent Blindness Georgia



Sponsorships

We are proud supporters of the American Society of Cataract and Refractive Surgery (ASCRS) Foundation, International Society of Refractive Surgery (ISRS), the International Council of Ophthalmology (ICO), Ophthalmic World Leaders (OWL), and Beyond Blindness.



Corporate Ethics, Responsibility, and Governance

GRI 102: General Disclosures 2021—Governance

At STAAR Surgical, we have developed charter documents and guidelines regarding important corporate governance matters, which reflect our commitment to building long-term shareholder value with an emphasis on good governance. For further details on these guidelines and other corporate governance policies, please visit our Investor Relations webpage or consult our most recent Proxy Statement.

As of the end of 2023, our Board was comprised of six directors. In March of 2024, we expanded the size of our Board to eight, and two new directors joined our Board. Our Board has established three standing committees, which assist the Board in carrying out its oversight responsibilities. In support of good governance practices, our Board structure also has a Lead Independent Director, which is new for 2023, who serves as a liaison between our Board Chair and the independent directors.

1 AUDIT COMMITTEE

Provides oversight of the financial reporting process, the company's independent auditors and the audit process, internal audit function, STAAR's system of internal controls, risk mitigation including cybersecurity assessment and management, and compliance with laws and regulations.

2 COMPENSATION COMMITTEE

Establishes the executive compensation program, approves executive compensation, recommends CEO compensation to the Board for approval, and oversees human capital management.

3 NOMINATING AND GOVERNANCE COMMITTEE

Recommends the appointment of directors, establishes the skills and characteristics required of director candidates, oversees Board evaluations, develops corporate governance principles, and oversees sustainability matters.

STAAR INSIGHT



As part of STAAR's Legal and Privacy team, I play a significant role in our regulatory compliance efforts, as well as our ESG governance. Having a community dedicated to ethical and responsible business practices is crucial for risk management and an important part of why I am so proud to work at STAAR.

I am privileged to spearhead our ESG governance initiatives and support our "empowered employee" ethos. The data clearly demonstrates that employees in diverse and inclusive companies (like STAAR) have longer tenures and are driven to contribute to improved business results, innovation, and decision-making.

The positive impact of our empowered employees is visible in many aspects of our company, including numerous data protection champions across the organization. This result underscores our unwavering commitment to data security and privacy, the effectiveness of robust training programs, and our remarkable workforce and Information Security team."

Kathleen Determann
Associate General Counsel

Leadership and Oversight of ESG Initiatives

We have established four committees to lead our ESG efforts, which meet regularly to review progress on ESG initiatives.



ESG STEERING COMMITTEE

A global, cross-functional team which meets periodically to review progress on our key ESG initiatives and to consider future ESG imperatives.



ESG SUB-COMMITTEE

Cross-functional teams who support the ESG Steering Committee in action planning and employee engagement for our European and Asian teams and global environmental and climate risk initiatives.



DIVERSITY, EQUITY, AND INCLUSION COMMITTEE

A cross-functional committee comprised of a diverse group of STAAR employees. They foster a work environment that is globally inclusive and embraces the diverse nature of our workforce while helping to advance our Visual Freedom mission. This committee meets regularly and reports progress to our CEO.



CLIMATE RISK COMMITTEE

This committee considers climate-related governance and risk management, greenhouse gas metrics, tracking and controls, and climate-related financial metrics. The committee works to identify and set strategy as it relates to material climate-related risks.

As part of its responsibilities, our Board oversees the assessment of our major business risks and the measures we take to identify, mitigate, and manage our risk profile. Members of management provide regular updates to the Board and its committees on our significant ESG activities, including the risks and opportunities they present.

These committees, in collaboration with our operational Device Safety Committee and Health and Safety Committee, work diligently to uphold the quality, responsibility, and sustainability principles of STAAR by implementing innovative solutions that align to the values of our investors, business partners, employees, customers, and the communities and patients we serve.

Board Diversity

The Board is also committed to having a membership that reflects a diversity of gender, race, ethnicity, age, and background. This commitment is demonstrated by the fact that the eight-member Board currently includes four female directors and four directors who identify as members of underrepresented populations. Our directors currently range in age from 41 to 68 years old.

GRI 103: Management Approach; GRI 417: Marketing and Labeling

Business Ethics and Ethical Marketing Practices

At STAAR, we place a strong emphasis on upholding ethical business practices by aligning our core values with integrity, ethics, and compliance. We seek to foster confidence in our surgeons by providing them with training, education, and support on our products to enhance patient care. Our team members are required to adhere to our Code of Conduct, as well as our Compliance Program for Interactions with Healthcare Professionals.

Our comprehensive policies and initiatives offer clear guidance on various aspects concerning interactions with healthcare professionals, including:

- Upholding ethical business standards, which involve respecting the independent medical judgment of healthcare professionals
- Prohibiting the promotion of "off-label" use for STAAR's medical devices in accordance with the US Food, Drug, and Cosmetic Act and relevant laws
- Establishing limits on interactions and expenses related to meals during meetings with healthcare professionals

Our employees undergo regular training in the Code of Conduct, credible reports of violations are investigated, and appropriate corrective measures are taken based on those findings. Our Internal Audit function regularly assesses compliance with internal policies, such as regular Code of Conduct training and spending limits for interactions with healthcare professionals.

Moreover, our Medical, Legal, and Regulatory departments systematically review promotional materials to confirm accuracy, fair balance, and compliance with applicable regulations. Additionally, we require that distributors comply with applicable local regulations on medical device marketing.

GRI 410: Security Practices; GRI 418: Customer Privacy

Data Security and Privacy

STAAR maintains a commitment to safeguarding customer, employee, consumer, patient, and company data while adhering to relevant laws and regulations. The oversight of our privacy and security compliance falls under the purview of STAAR's Chief Information Officer (CIO). Collaborating with the Data Protection Officer, Director of Information Security, and Internal Audit functions, our CIO addresses cybersecurity and data privacy risks. We continuously enhance our electronic tools, information governance, and security controls to fortify our cybersecurity defenses, enabling swift responses and mitigation in the event of data breaches. Moreover, we uphold business continuity by maintaining backups of critical systems, disaster recovery capabilities, and cybersecurity insurance.

In 2023, our Information Security team initiated regular employee training sessions utilizing real-life cybersecurity scenarios to heighten awareness of prevalent tactics employed by threat actors. Our employees undergo annual training covering local data privacy compliance, cybersecurity awareness, and the significance of safeguarding our information assets. This training regimen is complemented by the development of our Data Privacy and Security Program, guiding employees on securely managing personal information essential for our operations. Topics include:

- Handling and safeguarding personal information
- Security incident reporting procedure
- Global security password policy
- Data privacy and security incident response protocol
- Information governance and sensitive data management

Information Security and Cyber Risk Awareness (localized and role-based)

INFORMATION SECURITY AND DATA PRIVACY TRAINING**	2021 Hours of training*	2021 Percentage of Employees Assigned*	2022 Hours of Training*	2022 Percentage of Employees Assigned*	2023 Hours of Training	2023 Percentage of Local Employees Assigned
US Information Security Training Participation***	214	81%	107	93%	120	92%
Global Information Security Training Participation	N/A	N/A	N/A	N/A	88	98%
US Data Privacy and Security Training Participation***	108	81%	309	100%	N/A	N/A
Global Privacy and Data Protection	N/A	N/A	N/A	N/A	5,801	100%
GDPR Introduction and Overview	N/A	N/A	N/A	N/A	134	100%
GDPR for Data Handlers	N/A	N/A	N/A	N/A	107	100%
How to Comply with the GDPR in the US	N/A	N/A	N/A	N/A	75	100%
Key Principles of the GDPR	N/A	N/A	N/A	N/A	30	100%
Navigating the GDPR with our US Partners	N/A	N/A	N/A	N/A	58	100%
Personal Information Protection Law (PIPL) (China) [Simplified Chinese]	N/A	N/A	N/A	N/A	57	100%
Transfers of Data Outside of the EU	N/A	N/A	N/A	N/A	38	100%
California Privacy Rights Act (CPRA & CCPA)	N/A	N/A	N/A	N/A	61	100%
Protection of Personal Information: Japan Edition [Japanese]	N/A	N/A	N/A	N/A	57	100%

*US data only.

** Note, information security and cyber risk awareness training is offered globally in local languages. At the time of this report, information pertaining to hours of international training and the percentage of employees assigned is unavailable.

*** Replaced in 2023 with Global Privacy and Data Protection course.

Lastly, in working with our Internal Audit function and external cybersecurity experts, we execute assessments of our network and systems security controls, including periodic global phishing tests. STAAR's Internal Audit function reports the results of these assessments to the Audit Committee of the Board of Directors. While we have previously leveraged ISO 27001 as guidance, we assessed our cybersecurity program to implement a more formal corporate standard framework. As a result, we have adopted the National Institute of Standards and Technology Cybersecurity Framework (NIST CSF) as the governance framework for our cybersecurity program and created a strategic plan to enhance, monitor, and maintain our program.

METRIC	2021	2022	2023
Total amount of monetary losses as a result of legal proceedings associated with user privacy	0	0	0
Number of law enforcement requests for user information	0	0	0
Number of users whose information was requested by law enforcement	0	0	0
Percentage resulting in disclosure	0	0	0

In 2023, STAAR did not have any data security breaches that exposed PII*, PCI**, PHI*** or corporate restricted information pertaining to either STAAR or our customers, patients or vendors. STAAR continues to invest in our information security infrastructure, monitoring and employee training, consistent with our dedication to data protection.

**Personally Identifiable Information (PII), or Sensitive Personal Information (SPI), as used in Canadian, US, and European privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.*

***The Payment Card Industry (PCI) Data Security Standard (PCI DSS) is a proprietary information security standard for organizations that handle branded credit cards from the major card schemes including Visa, MasterCard, American Express, Discover, and JCB.*

****Protected Health Information (PHI) generally refers to health data, such as patient name, date of birth, vision information, and other unique identifiers that a US healthcare professional collects as part of providing health care services.*



Product and Operational Quality

GRI 416: Customer Health and Safety

At STAAR, we are committed to a culture of quality that remains central to our business operations and our products. We believe that our products and services should consistently exceed customer expectations in terms of quality, safety, and efficacy. This commitment is upheld through the continuous enhancement of our quality management and business systems, along with adherence to global regulatory standards.

Our responsibility is paramount, reflected in the design and development of our EVO ICL lens in alignment with international ISO standards to achieve outstanding levels of quality. Embracing a culture of continuous improvement, we employ a risk assessment and mitigation strategy as outlined in ISO 14971. This approach encompasses evaluating risks associated with design, materials, processes, manufacturing, packaging, and usage.

Key points highlighted in our approach include:

- Designing and developing the EVO ICL lens in accordance with ISO standards
- Utilizing a risk assessment and mitigation strategy as per ISO 14971

We incorporate specific standards for the EVO ICL, including:

- ISO 11979 series for intraocular lenses
- ISO 10993 standard for biocompatibility materials handling and processing
- ISO 11607 and ISO 17665 standards for packaging and sterilization
- ISO 13485 for medical devices quality management systems

Our ongoing manufacturing processes are maintained and improved through our Quality Management System. Compliant with ISO 13485 standards, our Quality Management System is essential for regulatory compliance under the US FDA Quality System Regulations (21 CFR 820) and has undergone rigorous audits and certifications by our EU Notified Body and other regulatory authorities.

STAAR INSIGHT



At STAAR, I am leading a significant project to implement an electronic validation solution globally, transitioning from a 100% paper-based process to reduce waste, maintain data integrity, and enhance compliance. These efforts align well with my background as an engineer and my passion for streamlining processes with consistent output, waste reduction, and conserving resources.

A large project like this requires a great deal of organizational change management. Working with a diverse team, some direct reports and others extended members from other departments, really enhances our deliverables. With various experiences, backgrounds, cultures, and genders, we all come together to work efficiently and effectively toward our common goal, demonstrating that diversity is a key factor in delivering impactful business solutions.

Everyone wants a work environment where they are valued and able to contribute and have a positive impact on the business. STAAR's focus on the environment and diversity not only offers economic advantages with potentially improving the financial health of the company but presents STAAR as an attractive option to potential new employees, and investors."

Manjeet Punekar

Senior Director, Global Validation

Innovation and Materials

At STAAR, our foremost commitment lies in prioritizing the safety and effectiveness of our medical devices to enhance patient health outcomes. The core of our operations revolves around providing products free from hazardous materials at the point of packaging and delivery to surgeons for implantation. Our dedication to innovation is evident in the utilization of advanced lens materials that not only deliver exceptional optical performance but also underscore our efforts to minimize our environmental footprint and promote employee safety within our operations.

Supply Chain Management

We adopt a thorough approach to evaluating the quality and traceability of our materials and products across our supply chains. Our critical suppliers, processes, materials, and products adhere to the quality system requirements specifically designed for medical devices. Engaging in third-party audit initiatives is a key aspect of our commitment to ensuring that our processes, controls, and systems align with the diverse quality system standards mandated by regulatory bodies globally.

Monitoring the performance of our suppliers is integral to our operations. This involves a structured program that encompasses assessing the materials supplied and conducting audits on the facilities, systems, and processes associated with these materials. Our focus remains on upholding product quality standards and mitigating supply chain disruptions through effective supply chain management practices, internal audit protocols, and alignment with our Quality Management System.

We are dedicated to transparency and traceability within our supply chains. We do this to safeguard the integrity of our products and streamline the speed-to-market process, which reinforces our commitment to delivering high-quality medical devices efficiently and reliably.

Supplier Code of Conduct

We are committed to achieving our objectives with integrity and in alignment with our values. We maintain high standards for ourselves and expect a similar level of integrity from our suppliers. Central to our supplier engagement is the **Supplier Code of Conduct**, which serves as an extension of our standard terms and conditions of purchase. When selecting partners, we assess their alignment with the principles and values in this code.

The **Supplier Code of Conduct** encompasses key areas such as business ethics, human rights, quality assurance, and legal compliance. Suppliers undergo audits based on their ranking within our supplier hierarchy. All suppliers within our Quality Management System are mandated to endorse the **Supplier Code of Conduct** before approval and are subject to periodic audits.

We approach our supplier relationships with a sense of responsibility and diligence. We collaborate with suppliers in their efforts to abide by our shared values and dedication to ethical conduct as we strive for mutual success and sustainability in our business endeavors.

Supplier Auditing and Assessment

We assess and audit our suppliers according to risk. We categorize our suppliers into five risk tiers (Rank A, B, C, D, and E in the table below), according to the products and services they provide. Their assigned tier determines the frequency (illustrated in the table below) and scope of our review for each supplier. Depending on their risk tier, suppliers undergo varying levels of audits and documentation. Audits may be on-site, remote, or desk audits, depending on the most applicable method.

We sell a Class III medical device; as such, we require certain suppliers to maintain their own Quality Management System and comply with international regulations and standards, including EN ISO 13485:2016. Audits are intended to determine, among other things, the suppliers' compliance with their quality management system. Our highest-risk suppliers participate in external agency audits by a recognized international regulatory agency such as the US FDA or International Standards Organization (ISO). STAAR's supplier management team audited greater than 65% of critical suppliers (rank A and B), which accounts for 60%+ of total spend.

We incorporate standards specific to medical devices such as:

- The Council Directive 93/42/EEC of 14 June 1993 concerning medical devices (MDD 93/42/ECC)
- The Medical Device Single Audit Program, under the International Medical Device Regulators Forum (IMDRF) (MDSAP)
- The EN ISO:13485: 2016—Medical devices—Quality Management Systems—Requirements for regulatory purposes
- Regulation (EU) 2017/745—Applies to medical devices and their accessories, and it aims to ensure a high level of safety and health protection for patients and users. The MDR applies to manufacturers, authorized representatives, importers, and distributors of medical devices

65%+

of our critical suppliers were audited by STAAR Surgical in 2023 compared to the industry standard benchmark of approximately 43% of critical suppliers/year.

RANK*	Annual audits	Audit every 2 years	Desk audit every 3 years	Review of consultant services and qualifications every 2 years	Review of consultant services and qualifications every 3 years	Percentage of supplier audited in 2023	Percentage of total spend
A—Product or service supplier	X					100%	~20%
B—Product or service supplier		X				~55%	~40%
B—Consultant				X			
C—Product or service supplier			X				
C—Consultant					X		

*Rank D and E suppliers do not require regular monitoring.

Product Traceability

We maintain a system to facilitate the traceability of materials and products through well-established procedures. Incoming materials and components are assigned part numbers for backward traceability, while finished products receive lot numbers for forward traceability. Particularly for Class III medical devices like our implantable lenses, each is allocated a distinct serial number to facilitate traceability.

This approach enables us to monitor the movement of materials and products across our manufacturing operations, in an effort to uphold quality control measures and comply with regulatory standards. To document traceability effectively, we utilize work orders for all medical devices, with a planned transition from paper-based to electronic work orders set as a priority for 2024.

Our electronic ERP system plays a pivotal role in this process by generating unique serial numbers and maintaining transactional data for medical devices. Barcode scanning is employed during labeling and final packaging stages to enhance efficiency, while Unique Device Identifiers are generated by our ERP system for medical devices, further bolstering traceability measures at the point of customer delivery.

In alignment with regulatory requirements, our organization has established internal protocols for the proper disposal of all waste, including any potentially hazardous chemical by-products generated during our manufacturing operations. Complementing our waste-reduction initiatives detailed in the Environmental Impact section of this report, STAAR collaborates with certified vendors for the disposal of hazardous waste and conducts regular testing of wastewater to support adherence to relevant regulations.

Within our Quality Management System framework, we have implemented processes and protocols to evaluate and mitigate risks associated with potential exposure of our products to harmful chemicals. Standard operating procedures are in place to govern the handling and management of potentially hazardous materials throughout our raw material manufacturing processes. Regular reviews of these standard operating procedures are conducted to proactively minimize the generation of hazardous waste and overall waste output.

Relevant Standard Operation Procedures (SOPs)

- Management of materials and waste products utilized in our routine manufacturing operations, encompassing the reception and handling of chemicals, storage and removal of chemical waste, and disposal of containers holding chemical raw materials
- Implementation of gowning and personal protective equipment (PPE) mandates for controlled manufacturing zones to prevent product contamination and safeguard employees against material hazards. This includes stipulations for environmental control, hygiene protocols, product and process oversight, and the gowning procedure for restricted areas. Additionally, it outlines proper storage and handling methods for in-process components and assembly

Our processes are directed to avoiding patient exposure to any hazardous chemical substances through our lenses.



We maintain procedures and systems to provide product traceability and identification regarding the following stages of manufacture and distribution:

- Raw materials and components receipt
- Manufacturing, assembly, testing, labeling, and packaging
- Finished goods warehousing
- Delivery to the surgeon customer
- Patient implant

Product Use and Patient Safety

In our commitment to patient safety, we adhere to industry standards like ISO 11979-5 Ophthalmic Implants—Intraocular Lenses—Part 5: Biocompatibility. This standard incorporates rigorous extraction testing and cytotoxicity assessments to verify the absence of significant quantities of potentially harmful chemicals in our products upon completion and delivery to the customer.

Surgeon Training

We require certification training for surgeons who are our customers to verify that they are well-informed before offering our products to potential patients. STAAR has organized Pre-Certification Surgeon Training Courses, Roundtables, and Education Sessions, including tutorials on patient education. Our Chief Medical Officer, a seasoned ophthalmic surgeon, travels globally to conduct "train the trainer" sessions and oversee training programs to uphold quality standards.

The surgeon training program at STAAR Surgical comprises a comprehensive didactic session covering product labeling details, patient indications for use, selection criteria, clinical assessment procedures, and surgical recommendations. This training is conducted by trained STAAR clinical personnel or designated training support staff, including those within surgical fellowship programs. Following the didactic training, surgeons progress to supervised surgical cases at their facilities with on-site product support from STAAR clinical staff or designated surgical proctors.

This structured program aims to support surgeon proficiency in performing surgical procedures using STAAR's implantable lenses and delivery systems. It is complemented by additional educational courses, hands-on surgical-procedure training labs (anatomical models), and other educational opportunities offered at medical conferences or through webinars.

Quality System and Safety Audits

STAAR's facilities undergo routine third-party audit assessments conducted by DEKRA (Deutscher Kraftfahrzeug-Überwachungs-Verein), our designated body for compliance with EN ISO 13485:2016, and the globally recognized Medical Device Single Audit Program (MDSAP) endorsed by Australia, Brazil, Canada, Japan, the US, and other health authorities including those from South Korea and Ukraine. In 2023, DEKRA conducted a successful surveillance audit across our US facilities (Monrovia (Walker), Monrovia (Royal Oaks), Tustin, and Aliso Viejo) and Switzerland (Nidau and Brugg) to evaluate compliance with MDD 93/42/ECC, MDSAP, and EN ISO:13485:2016 standards, certifying them for MDR (EU) 2017 adherence. Additionally, we had a successful surveillance audit by DEKRA from South Korea in 2023, which resulted in STAAR successful re-certification by the South Korean government.

External entities such as our EU Notified Body and health authorities like the US FDA review data and information pertaining to the safety and performance validation of our devices during the approval process. Following product approval, we engage in continuous monitoring and analysis of our products' safety and performance in the market through activities such as post market clinical follow-up studies, complaint assessment, investigation and trend analysis, and evaluation of relevant published literature. An example of this post-approval scrutiny is the regular internal review and assessment of data for the ICL Clinical Evaluation Report. This report is shared with various health authorities worldwide to foster transparency across jurisdictions.

Product Recalls

At STAAR, we conduct ongoing monitoring of the safety and performance of our products through a review of both internal and external data sources. Within our Quality Management System, we have established a reporting and escalation mechanism to oversee manufacturing processes and quality-control activities. Our complaint handling and post-market surveillance procedures enable us to track external field reports, facilitating the prompt identification and resolution of issues that may arise. Regular reviews by our executive management are intended to verify that our products consistently meet safety standards and perform as intended, while also identifying areas for enhancement.

Recognizing that the implantation of our medical devices carries inherent risks, despite our stringent quality protocols and Quality Management System initiatives, we acknowledge the potential for adverse events. In instances where a medical device fails to meet our internal standards or those set by regulatory bodies, a product recall may be necessary. The recall metrics for STAAR Surgical spanning 2020 to 2023 are detailed in the accompanying table.

METRIC	2020	2021	2022	2023
Number of product recalls, takebacks, or field safety notices	0	0	0	2*
Number of products listed on the FDA's MedWatch Safety Alerts for Human Medical Products database	0	0	0	0
Number of fatalities related to products	0	0	0	0
Number of FDA enforcement actions taken in response to violations of current Good Manufacturing Practices	0	0	0	0

* Neither recall required posting on Medwatch Safety Alert DB.

Safe Harbor

All statements that are not statements of historical fact are forward-looking statements, including statements about any of the following: any statement regarding product manufacturing, safety, design, or objective of management; marketing, business ethics, or supply chain management; environment or social-related aspirational targets or goals; and any statements of assumptions underlying any of the foregoing. Important factors that could cause actions to differ materially from those indicated by such forward-looking statements include the factors set forth in the company's Annual Report on Form 10-K for the year ended December 29, 2023 under the caption "Risk Factors," which is on file with the Securities and Exchange Commission and available in the "Investor Information" section of the company's website under the heading "SEC Filings." We disclaim any intention or obligation to update or revise any projections or forward-looking statements due to new information or events. These statements are based on expectations and assumptions as of the date of this Sustainability Report, and are subject to numerous risks and uncertainties, which could cause results to differ materially from those described in the forward-looking statements.

We welcome your views as a valued stakeholder. To provide feedback or to request further information, please email sustainabilityreport@staar.com.



Disclaimer

The preparation of the specified metrics included in this Sustainability Report required management to establish and interpret the criteria, make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect reported information. Measurements of certain amounts and metrics may include estimates and assumptions that are subject to substantial inherent measurement uncertainty. Obtaining sufficient, appropriate review evidence to support our conclusion does not reduce the inherent uncertainty in the amounts and metrics. Moreover, the selection by management of different but acceptable measurement methods, input data, or assumptions may have resulted in materially different amounts or metrics being reported from year to year.

A Company Dedicated to Visual Freedom

For 2024, we will focus on the following strategic imperatives:

- Delight customers by increasing surgeon confidence in measurement and size of ICLs
- Motivate employees by investing in IT Infrastructure and support
- Make EVO ICL products the premium choice for -6D to -8D globally
- Build shareholder value by focusing on new product innovation

Our Global Presence:

We have sold over 3,000,000 of our ICL lenses in more than 75 countries, with direct distribution (i.e., via STAAR representatives) in Japan, the US, Germany, Spain, Singapore, Canada, and the UK, with a combination of direct distribution and independent distribution (i.e., via distributors and STAAR representatives) in China, Korea, India, France, Benelux, Brazil, and Italy, and independent distribution in the remainder of the countries where we sell. At right is a snapshot of STAAR's Global "Eyeprint."



STAAR SURGICAL FACTS

40 Years

STAAR has been dedicated solely to ophthalmic surgery for over 40 years.

3 M+ Lenses

Over 3,000,000 ICLs have been sold globally to date

18% ICL Sales Growth

In 2023 global ICL sales vs. -3.3% growth in refractive industry procedures in 2023
Source: Market Scope, January 2019-2023

~17% Workforce Growth

~17% workforce growth in our global full-time workforce since March 1, 2023

SASB Mapping

Sustainability Accounting Standards Board Mapping

This table references the SASB Standard for the Medical Equipment & Supplies—Health Care Sector SASB Index.

TOPIC	CODE	SASB ACCOUNTING METRIC	2021 REPORTING
Affordability & Pricing	HC-MS-240a.1	Ratio of weighted average rate of net price increases (for all products) to the annual increase in the U.S. Consumer Price Index.	We did not increase the price of our ICLs in 2023 despite a 3% increase in the Consumer Price Index.
	HC-MS-240a.2	Description of how price information for each product is disclosed to customers or to their agents.	We sell based on established price structures for the specific country in which the customer is located. Such pricing varies by volume purchased and geographic location. In countries where we sell via distributors, our distributors establish their own pricing. In hybrid markets where we engage employees of STAAR to work together with distributors, we collaborate with distributors in establishing pricing structures for certain strategic and alliance customers.
Product Safety	HC-MS-250a.1	Number of recalls issued; total units recalled.	During 2023, STAAR issued: One medical device product recall (Class II—US only) that was reported to FDA and removed from the market or corrected. Zero medical device product recalls that were not reported to FDA. One medical device product recall that was reported to non-US national regulatory authorities (non-US product) and removed from the market or corrected.
	HC-MS-250a.2	List of products listed in the FDA's MedWatch Safety Alerts for Human Medical Products database.	As of December 31, 2023, the MedWatch Safety Alerts for Human Medical Products database included zero STAAR medical device products
	HC-MS-250a.3	Number of fatalities related to products as reported in the FDA Manufacturer and User Facility Device Experience.	In 2023, STAAR had zero fatalities associated with the products we manufacture.
	HC-MS-250a.4	Number of FDA enforcement actions taken in response to violations of current Good Manufacturing Practices (cGMP), by type.	In 2023, STAAR received: • Zero Form 483s • Zero warning letters • Zero seizures • Zero consent decrees
Ethical Marketing	HC-MS-270a.1	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims.	In 2023, STAAR had no monetary losses due to legal proceedings associated with false marketing claims.
	HC-MS-270a.2	Description of code of ethics governing promotion of off-label use of products.	Representatives from our Medical, Legal, and Regulatory departments review promotional material prepared by the Marketing department to assess claims regarding safety, efficacy, and other matters and provide periodic live trainings to improve employee knowledge. This includes ensuring that company-sponsored regional educational events are conducted in compliance with regulations in all applicable jurisdictions.

TOPIC	CODE	SASB ACCOUNTING METRIC	2021 REPORTING
Product Design & Lifecycle Management	HC-MS-410a.1	Discussion of process to assess and manage environmental and human health considerations associated with chemicals in products, and meet demand for sustainable products.	See Innovation and Materials , Product Manufacturing , and Product Use and Patient Safety for information about the company's approach in this area.
	HC-MS-410a.2	Total amount of products accepted for takeback and reused, recycled, or donated, broken down by: (1) devices and equipment and (2) supplies.	STAAR does not take back, reuse, or recycle used products as our medical devices are implanted into patients. Taking back previously implanted medical devices would expose our workforce, and potentially others, to biological hazards.
Supply Chain Management	HC-MS-430a.1	Percentage of (1) entity's facilities and (2) Tier I suppliers' facilities participating in third-party audit programs for manufacturing and product quality.	In 2023, DEKRA conducted Notified Body surveillance audits of our facilities in the US (Monrovia (Walker), Monrovia (Royal Oaks), Tustin, and Aliso Viejo) and Switzerland (Nidau and Brugg) for (EN) ISO 13485, MDR(EU) 2017/745, and MDSAP (ISO 13485) and certified them for compliance. Also in 2023, the Korea Ministry of Food and Drug Safety and the Korea Testing and Research Institute, conducted a re-certification audit of the US Monrovia facility, with a result that STAAR complies with the Korea Good Manufacturing Practices for Medical Devices. See Quality System and Safety Audits , and Supply Chain Management for related information.
	HC-MS-430a.2	Description of efforts to maintain traceability within the distribution chain.	STAAR has a range of systems and processes to maintain traceability of materials throughout the product supply and distribution chain: • raw material and component receipt • manufacturing, assembly, testing, labeling, and packaging • finished goods warehousing • delivery to the surgeon customer • patient implant Refer to Product Traceability for more information.
	HC-MS-430a.3	Description of the management of risks associated with the use of critical materials.	Our most critical material is Collamer, which we manufacture ourselves. The component parts of Collamer do not include rare earth elements or platinum group metals (as defined in the US National Research Council of the National Academies' "Minerals, Critical Minerals, and the US Economy"). We use a small number of critical raw materials in other aspects of our manufacturing processes.
Business Ethics	HC-MS-510a.1	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption.	In 2023, STAAR had no monetary losses due to legal proceedings associated with bribery or corruption that were previously reported in any company Exchange Act filings. See STAAR's Code of Business Conduct and Ethics for information about the company's approach in this area.
	HC-MS-510a.2	Description of code of ethics governing interactions with health care professionals.	See STAAR's Code of Business Conduct and Ethics for information about the company's approach in this area.