



EYEPOINT

Supplier Code of Conduct

EyePoint is committed to serving our customers, employees, investors, suppliers and the communities where we operate. Our commitment to integrity extends to our supply base. We believe in the rights and principles set forth in the U.N. Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

All suppliers, regardless of location, must adhere to this Supplier Code of Conduct when performing services for, or related to, EyePoint. EyePoint expects its suppliers to operate according to the highest ethical and legal principles. Suppliers are responsible for ensuring that any employees, affiliates, distributors, subcontractors, agents, or other representatives of suppliers providing products or services to EyePoint or to EyePoint's customers on behalf of EyePoint comply with this Supplier Code of Conduct.

- Suppliers must treat all workers with dignity and respect. Suppliers must not subject workers to, or threaten to subject workers to, harsh and inhumane treatment, including but not limited to corporal punishment, mental or physical coercion or verbal abuse, sexual harassment or sexual abuse. Disciplinary policies and procedures related to this requirement shall be clearly communicated to workers.
- Suppliers will not engage in, or support the use of, child labor, and suppliers shall comply with all applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location. Additionally, young workers may not be required to perform work which may be hazardous to their health, safety or morals.
- Suppliers will not utilize or source products or services from entities associated with forced, bonded, indentured, involuntary or exploitative prison, trafficked or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving or employing persons by means of threat, force, coercion, abduction or fraud for labor or services. All work must be voluntary and workers shall be free to terminate their employment at any time.
- Suppliers who provide residential facilities for their employees must also provide safe and healthy facilities. Supplier-provided facilities must meet the host country housing and safety standards. There shall be no unreasonable restrictions on entering, exiting or movement within company-provided facilities. Suppliers will take reasonable efforts to ensure that their own suppliers comply with this requirement.
- Suppliers must comply with all applicable wage and hour laws, including those relating to minimum wage, overtime hours, and other elements of compensation, and must provide all legally mandated benefits. Suppliers will not require employees to work more than the maximum number of hours permitted under applicable laws or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off.
- Suppliers must respect workers' rights to freedom of association and collective bargaining in compliance with existing local laws and without discrimination, intimidation or harassment as well as respect the right

of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or harassment.

- EyePoint expects suppliers to treat their employees with respect and dignity and to refrain from any unlawful harassment and discrimination. Suppliers will not discriminate against any person because of their race, color, gender, religion, ethnicity or national origin, age, disability or other medical condition, sexual orientation, gender identity, genetic information, pregnancy, marital status, veteran status, political affiliation, union membership or any other basis protected by applicable national or local law.
- Suppliers should strive to minimize their environmental impact and promote health and safety in conducting their business. Suppliers must comply with all applicable environmental, health and safety laws and regulations, provide workers with a safe and healthy work environment, and provide necessary medical treatment and implement corrective actions to eliminate causes of injury. Suppliers should reduce their impact on the environment through the conservation of natural resources, minimization of emissions and waste, responsible chemicals management and other practices.
- Suppliers should work against corruption in all its forms and are prohibited from engaging in corruption, extortion or embezzlement. Suppliers must comply with all applicable anti-corruption laws and regulations of the countries in which they operate such as the U.S. Foreign Corrupt Practices Act, and as applicable, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention and any other international anti-corruption conventions. Suppliers will not offer or accept bribes or employ other means to obtain an undue or improper advantage. Bribes, kickbacks, facilitating payments and similar payments to government officials or to EyePoint employees or agents acting on EyePoint's behalf are prohibited. EyePoint employees may not accept gifts of more than nominal value or lavish entertainment from suppliers. When business meals and entertainment are appropriate to further a legitimate business purpose, those expenses may not be extravagant in nature.
- Suppliers must respect and refrain from infringing upon the intellectual property rights of others, including patents, trademarks, copyrights and other proprietary rights.
- Suppliers are expected to deal fairly with EyePoint employees as well as their other business partners and should not take unfair advantage through manipulation, concealment, abuse, misrepresentation of material facts or any other unfair dealing. Suppliers will not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust and competition laws. Suppliers will uphold fair business standards in advertising, sales and competition.
- Suppliers must protect the Confidential Information entrusted to them by EyePoint, its affiliates, customers or suppliers. Confidential Information may only be used and disclosed in a manner authorized by EyePoint. Confidential Information includes any business information of EyePoint, its customers or suppliers that is not generally known to the public.

Suppliers using subcontractors to provide goods and services to EyePoint will also be responsible for the subcontracted party for compliance with this Code. EyePoint reserves the right to monitor supplier compliance with this Code through supplier surveys and certifications as well as other means that EyePoint deems appropriate. Supplier will provide documentation verifying their compliance with this Code as reasonably required by EyePoint to assist the company in its own compliance efforts. Supplier will self-report any violations of this Code to EyePoint. If a supplier is found in violation of this Code, EyePoint will require the supplier to take prompt, remedial measures to address the violation, including instituting clear and trustworthy action plans to ensure compliance with this Code. While EyePoint is committed to working with suppliers to improve workplace conditions, EyePoint maintains the right to terminate its relationship, without liability to

EyePoint, with suppliers who violate this Code, refuse to rectify deficiencies or fail to provide EyePoint with requested surveys and certifications.

Supplier will not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code.