

TRANSPARENCY IN SUPPLY CHAINS

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) went into effect in the State of California. Under the law, large manufacturers and retailers are required to disclose their efforts to eradicate modern slavery and human trafficking within their supply chains. The law's purpose is to educate consumers, so they can make informed decisions and purchase goods from companies that responsibly manage their supply chains.

At Glaukos Corporation, we value our relationships with our suppliers. We endeavor to conduct business with suppliers who operate in a responsible and humane manner, and we have documented our commitment to this approach by adopting the Glaukos Corporation Supplier Code of Conduct. This Code requires direct suppliers that provide components for use in our products to, among other things:

- not engage in human trafficking, modern slavery or child labor;
- operate with the highest standards for business integrity;;
- encourage workplace health and safety; and
- abide by all applicable laws, including anti-bribery and anti-corruption laws.

Verification of Product Supply Chains

At Glaukos, we believe our supplier base risk profile indicates a low risk of forced labor in our supply chains. Due to the highly regulated medical device and pharmaceutical industries that affect the components we purchase for our products, we typically aim to minimize sourcing from less developed regions of the world, which reduces this risk.

As we assess our supplier base risk profile, our focus is the general conditions of the country where the goods are produced. We leverage an internal, cross-functional team of company personnel to consider such conditions as we evaluate new suppliers for our product components, to ensure risks are fairly identified and appropriately weighed.

Prior to engaging a new supplier, Glaukos typically evaluates the supplier through a quality-based assessment process. Our Supplier Code of Conduct is distributed to our product component suppliers each year. Additionally, beginning in 2020 we will require suppliers to complete an annual human rights questionnaire. Glaukos does not engage any third party monitoring service to conduct verifications.

Supplier Audits

As Glaukos' has determined that our supply chain has a low risk of modern slavery, we have not typically performed audits of our suppliers' compliance with labor laws or human trafficking prevention programs.

Certification of Compliance with Laws

As a condition of doing business with Glaukos, our suppliers warrant that the products they supply are manufactured in accordance with all applicable laws, regulations and standards. Beginning in 2020, our annual supplier human rights questionnaire will reiterate to our suppliers, in writing, Glaukos' policy and expectations regarding forced labor, and that this policy and expectation extends not only to our suppliers' own operations and production facilities, but to their upstream material and component suppliers as well.

Accountability

In an effort to continuously improve, Glaukos' approach to forced labor is consistently evolving as we adopt proven methods to help discover and eradicate it from our supply chain. If forced labor indicators are found in a supplier's production facility, we will work to assess the situation and evaluate a variety of factors including the supplier's and facility's ability to remediate and the likelihood of sustained improvement. When remediation is achievable, we will expect the supplier to develop and implement an appropriate corrective action program. If the situation is not conducive to remediation, then we will consider disengaging responsibly from a facility.

Employee Training and Compliance

Glaukos has trained its key supply chain personnel on the detection and prevention of modern slavery and this training will be repeated periodically to reinforce its importance. Additionally, all Glaukos employees are required to comply with Glaukos' written Code of Business Conduct and Ethics (the "Glaukos Code of Conduct"). Our employees are trained on the Glaukos Code of Conduct to enhance understanding and compliance with its standards, and certify at the time of employment that they understand its terms. In addition, we investigate potential violations of the Glaukos Code of Conduct and, when appropriate, take remedial and/or disciplinary action.

Glaukos is committed to ensuring that our supply chain partners behave ethically, support a safe and healthy workplace, and comply with applicable laws. We regularly undertake numerous activities, including the activities described above, to satisfy ourselves and others that the products and services provided to Glaukos meet this commitment.