

GLAUKOS CORPORATION

SUPPLIER CODE OF CONDUCT AND CONFLICT MINERALS POLICY

Applicability

Glaukos Corporation (“Glaukos”) endeavors to conduct business responsibly and ethically. Glaukos respects international human rights principles, including the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and strives to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the applicable requirements of Section 1502 of the Dodd-Frank Act, which aims to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries.

This Supplier Code of Conduct (“Code of Conduct”) applies to all direct suppliers that provide components to Glaukos for use in Glaukos’ commercial products (“Supplier”). The Code of Conduct is aligned with Glaukos’ Human and Workforce Rights Policy and outlines the requirements and expectations for Suppliers throughout their operations and throughout their entire product supply chain. Glaukos expects its Suppliers to observe responsible workplace practices and develop and implement internal business processes in compliance with this Code of Conduct and Glaukos’ Human and Workforce Rights Policy.

No Child Labor

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

Voluntary Employment

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

Work Hours and Wages

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

No Discrimination, Abuse, or Harassment

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

Health and Safety

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

Freedom of Association and Collective Bargaining

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

Business Integrity

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

Conflict Minerals

Commercial component suppliers with whom Glaukos enters into written contracts are required to provide Glaukos with information regarding their upstream mineral supply chain in the form of a conflict minerals reporting template (CMRT), and to work with Glaukos to ensure smelters and refiners in their supply chain sourcing minerals from conflict-affected and high-risk areas become conformant to the Responsible Minerals Assurance Process assessment protocols or actively work towards becoming conformant.

Reporting Violations of the Code

Glaukos suppliers and their workers have the right to report suspected violations of this Code of Conduct or applicable law. Known or suspected violations may be reported directly to Glaukos, or to its third-party provider, Ethical Advocate, which is available 24 hours a day, 7 days a week at 1-866-910-3108 and online at <https://glaukos.ethicaladvocate.com>. We will employ a prompt and victim-centered response to such reports. Investigations into reports of known or suspected violations will be commenced within 5 business days of Glaukos management being informed of such report, and will be led by its legal, human resources or compliance departments, who will maintain the confidentiality of the reporter or victims to the extent possible. Glaukos will make every effort to ensure that potential victims are supported and protected to the extent feasible and receive appropriate recompense.

Demonstration of Compliance

Supplier must be able to demonstrate compliance with this Code of Conduct upon Glaukos' request, and Glaukos expects you to take action to correct any non-compliance. Glaukos reserves the right to audit Supplier's operation and facilities to determine compliance with this Code of Conduct, and terminate an agreement with any Supplier that engages in modern slavery or otherwise violates this Code of Conduct.