



Compliance Reporting and Anti-Retaliation Policy

Commitment to Compliance

Sight Sciences, Inc. (the “Company”) is committed to conducting its business ethically and in compliance with Company’s Code of Business Conduct and Ethics; its policies and procedures; and the applicable laws, regulations, and industry codes in the countries in which it operates. The Company demonstrates its commitment to employees, patients, and other stakeholders by responding to concerns of potential legal or policy violations through open and clear communication.

Scope & Compliance

This Policy applies to all Company employees as well as our contingent workers, consultants, and others who have temporary assignments with Sight Sciences (together, “employees and contractors”).

Company employees who violate this Policy are subject to disciplinary action, up to and including termination. Consultants and others who have temporary assignments who violate this Policy may be subject to termination of all commercial relationships with the Company.

Purpose

The purpose of this Policy is to create an environment in which legal, regulatory and policy concerns can and will be raised in a manner that is free from fear of retribution and retaliation. To facilitate that environment, the Company has an Ethics Hotline to provide employees and contractors with a channel to raise questions, concerns or allegations of noncompliance or unethical conduct in a confidential manner, and anonymously if desired.

What and How to Report

- **Duty to Report.** Employees and contractors have a duty to immediately report any suspected or known improper conduct that may violate the Company Code of Business Conduct and Ethics, any Company policy or procedure, industry guidelines, or applicable laws or regulations. Employees and contractors can report concerns to their direct supervisor, the People Department, the Legal and Compliance Departments, Company management, or through our confidential Ethics Hotline. Failure to promptly report a compliance concern may be grounds for disciplinary action, up to and including termination.
- **Ethics Hotline.** The Company’s Ethics Hotline is available online or via phone:
 - a. Online: sightsciences.ethicspoint.com
 - b. Phone: (833) 624-0284



External third parties may also use the Compliance Hotline to report suspected or known improper conduct that may violate applicable laws or Company policies.

- **Anonymity.** Reports may be submitted anonymously through the Ethics Hotline. You do not need to include your name or identifying characteristics. Although anonymous reports will be accepted and handled in accordance with this Policy, anonymous reports may prevent the Company from fully investigating the matter and taking remedial action because proper investigation may require details, which could, directly or indirectly, result in identification.
- **Good Faith.** The Ethics Hotline must not be used to raise false accusations. Please note that employees and contractors who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by this Policy, and may be subject to disciplinary action, up to and including termination of employment.
- **Non-Retaliation Policy.** The Company has a strict zero tolerance policy for any form of retaliation against, or intimidation of, employees and contractors who raise a compliance concern in good faith or who participate in an internal investigation. The Company will not discharge, demote, suspend, threaten, discriminate against or harass an employee or contractor, and will not tolerate other employees or contractors who engage in such behavior, against any employee or contractor with respect to the good faith and accurate reporting of potential compliance concerns or participation in an internal investigation. Incidents of retaliation against an employee or contractor must be reported immediately to the Legal and Compliance Departments.
- **Reportable Information.** Any complaint should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper assessment and investigation. The complaint describing an alleged violation or concern should be candid and set forth all of the information that the employee or contractor knows regarding the allegation or concern.

Investigating Compliance Matters

Internal investigations may be conducted for a variety of reasons. An investigation may be compulsory, while others may be discretionary and prompted by, for example, the findings of an audit. Upon receipt of a complaint, the Chief Legal Officer and the Chief Compliance Officer (or their designee(s)) will be responsible for determining, in their reasonable judgment, whether a reasonable basis exists for commencing an investigation into the complaint.

- **Inquiry.** To assist in making this determination, the Chief Legal Officer or Chief Compliance Officer (or their designee(s)) may conduct an initial, informal inquiry. To the extent possible and as required by law, the Company will take steps to keep confidential the proceedings and the identity of the reporting employee or contractor.



- **Employee Cooperation.** The Company depends on the cooperation of its employees and contractors when conducting internal investigations. Employees and contractors are expected to fully cooperate with internal investigations. Many investigations are conducted by the Company's legal counsel, and employees and contractors may be asked for information related to an investigation by the Company's legal counsel. Company counsel represents the Company, not any individual employee.
- **Privileged Communications.** The Company has a strong interest in maintaining the confidentiality of certain internal communications, including communications protected from disclosure to third-parties due to the attorney-client privilege and attorney work product doctrine. Communications with Company counsel may be protected by the attorney-client privilege, but the privilege belongs to the Company and not any individual employee. This means that only the Company may waive the attorney-client privilege. The Company relies on its employees and contractors to be mindful of confidentiality, privilege, and discretion when it comes to documentation and communications related to internal investigations.
- **Corrective Action.** The Chief Legal Officer and the Chief Compliance Officer (or their designee(s)) will review the investigation findings and determine the validity (i.e., substantiated or unsubstantiated) of a complaint and work with the People Department to determine and implement the appropriate corrective action, if necessary.
- **Retention and Reporting of Complaints.** All complaints and any supporting documentation regarding an alleged violation or concern will remain confidential to the extent practicable and as required by law and Company policy. The Chief Compliance Office is responsible for keeping the Company's executive Compliance Committee, as well as the Company's Board of Directors and its sub-committees, appropriately informed of reported complaints.

Questions

The Compliance Department is responsible for the administration of this Policy. Employees and contractors are encouraged to contact the Compliance Department with any questions about the Company's Compliance Reporting and Anti-Retaliation Policy.



**ATTACHMENT A
CERTIFICATION OF COMPLIANCE**

I acknowledge that I have received and read a copy of Sight Sciences' Compliance Reporting and Anti-Retaliation Policy ("Policy") and understand that it is my responsibility to be familiar with and abide by its terms. I understand that I have a duty to immediately report any suspected or known improper conduct to Sight Sciences and hereby certify that I am not aware of any suspected or known improper conduct that has not been reported and that would be reportable hereunder.

I understand that Sight Sciences reserves the right to, as permitted by law, to interpret, administer, change, modify, or delete this Policy at any time with or without notice. I further understand that neither this Policy nor any other communication by a management representative or any other employee, whether oral or written, is intended in any way to create a contract of employment. I understand that I am employed at will and this Policy does not modify my at-will employment status.

SIGNATURE

DATE

TITLE