



Supplier Code of Ethics & Conduct

Sight Sciences, Inc. (the “Company,” “we,” or “our”) is committed to responsible product sourcing and conducting our business practices and operations with integrity and in compliance with all applicable laws and regulations. The Company strives to select third-party manufacturers and other vendors that supply parts and products (collectively, “Suppliers”) who share these commitments. This Supplier Code of Ethics & Conduct (“Code”) outlines the principles and ethics the Company’s Suppliers are expected to comply with.

In accordance with these commitments and its principles, the Company expects that each of its Suppliers, their parent companies, subsidiaries and affiliated entities, employees, temporary or not, comply with the principles of this Code.

Business Ethics

Conflict of Interest and Modest Gifts

Suppliers will not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, or obligations to the Company. The Company’s employees are permitted to give and accept only modest entertainment and tokens of appreciation (i.e., gifts) that are considered usual and customary and in compliance with applicable laws and regulations.

Privacy and Confidentiality

Suppliers are expected to protect the personal information of their business partners, customers, employees, and others they do business with. In addition, Suppliers are contractually required to protect all proprietary or confidential information that the Company shares with Suppliers.

Anti-Bribery and Anti-Corruption

The Company complies with the anti-bribery and anti-corruption laws of the countries in which it does business, such as the Foreign Corrupt Practices Act, the U.K Bribery Act, and any similar laws. It is imperative that our Suppliers also abide by all applicable anti-bribery and anti-corruption laws and regulations. Without limitation, Suppliers may not make, on the Company’s behalf, any direct or indirect payments or promises of payment to foreign government officials for the purpose of inducing an unfair business advantage. In addition, certain anti-bribery and anti-corruption laws, including the U.K. Bribery Act, also forbid bribery in the private sector. The same principles apply in the governmental and commercial contexts: do not corruptly offer, promise, or accept anything of value.

Suppliers are expected to agree to comply with these principles during their contacts with employees of the Company as well as with their own subcontractors. The Supplier agrees to implement a compliance program aiming at detecting and preventing corruption, including internal rules prohibiting and sanctioning corruption practices, employee’s awareness-raising campaign, and appropriate control systems.



Social Responsibility

Human, Social, and Labor Rights

The Company respects the human rights and dignity of people throughout its operations and global supply chain. The Company expects its Suppliers to comply with laws that promote safe working conditions and individual security, laws prohibiting forced labor, the employment of underage children, and human trafficking.

The Company supports the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. All Suppliers are encouraged to support these principles.

In accordance with the Global Compact principles, the Universal Declaration of Human Rights, the International Labor Organization (ILO), and its own ethical principles, the Company encourages its Suppliers to:

- support and respect the protection of internationally proclaimed human rights;
- make sure that they are not complicit in human rights abuses;
- contribute to the elimination of all forms of forced and compulsory labor including involuntary prison work;
- contribute to the effective abolition of child labor. The age of admission to employment or the minimum working age may not be lower than the compulsory schooling age under applicable laws (generally 15 years of age);
- contribute to the elimination of discrimination in respect to employment and occupation; and
- guarantee that all of their employees are able to work in a safe environment where they are free from the risk of unlawful harassment.

The Company does not, and will not, tolerate the use of forced or involuntary labor. Suppliers should not utilize, support, or require any forced or involuntary labor, whether in the form of prison labor, indentured labor, bonded labor, or engage in any form of human trafficking.

In addition, the Company does not tolerate the use of child labor. The Company will not knowingly accept products or services from Suppliers that use child labor. The Company expects Suppliers to comply with applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirements in the countries in which they operate. Suppliers should maintain a reliable system to verify the eligibility of all workers, including age eligibility and legal status of foreign workers.



Health and Safety

Suppliers should comply with all applicable safety and health laws and regulations in the countries in which they operate. The Company expects Suppliers to provide a safe working environment for its employees that supports accident prevention and appropriately mitigates exposure to health risks occurring within or arising out of the course of work. Suppliers are also expected to provide materials, components, products, and services that meet all applicable health and safety requirements.

Working Conditions and Nondiscrimination

The Company expects Suppliers to treat each of their employees with respect and dignity and expects that Supplier will not subject any employee to any physical, sexual, psychological, verbal, or any other form of harassment or abuse.

Suppliers must comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours. If no minimum wage law applies, Supplier should pay employees at least the prevailing industry wage. The Company will not knowingly use Suppliers who require employees to work in excess of the local statutory requirements without proper compensation as required by applicable law. Employees should be permitted reasonable days off (e.g., at least one day off for every seven-day period) and must have leave privileges as required by applicable law.

Suppliers shall not subject any person to discrimination in employment (including hiring, salary, benefits, advancement, discipline, termination, or retirement) on the basis of age, gender, race, color, ancestry, religion, creed, citizenship status, disability, ethnic or national origin, marital status, military status, sexual orientation, gender identity and expression, pregnancy, or any factors not related to the job. Suppliers must comply with all applicable local laws concerning discrimination in hiring and employment practices.

Security and Freedom of Movement

Suppliers will provide measures necessary for physical and information security at all of its facilities. Additionally, our Suppliers should not place any unreasonable restriction on the ability its employees to leave the workplace or terminate employment, such as holding copies of employee identification documents.

Environmental Responsibility

Environmental Compliance

Suppliers shall comply with all applicable environmental laws and regulations in the countries in which they operate. Suppliers are also expected to conduct their operations in a way that protects the environment.



Conservation

Suppliers are expected to proactively monitor their environmental footprint through policies and procedures that help conserve natural resources, minimize greenhouse gas emissions, eliminate waste, recycle materials, promote the purchase of sustainable materials, products, and services. The Company encourages its Suppliers to agree to preserve natural resources and biodiversity, structuring their activities and their supply chain, to avoid or minimize negative environmental impacts (e.g., greenhouse gas and pollutants, emissions, wastes, etc.) by endeavoring to continuously improve their products, processes, and services with the goal of making them more environmentally friendly.

Hazardous Materials

Suppliers are expected to implement policies and procedures related to the safe management of hazardous materials and the legal restriction of specific substances. Suppliers agree to identify the source and trace the chain of custody, insofar as this is possible, of certain minerals such as tantalum, tin, tungsten, and gold used in the manufacture of products supplied to the Company. These control measures will be made available upon request. If materials purchased are covered under the provision of the OSHA Hazard Communication Standard (29 CFR 1901.1200), a Safety Data Sheet (SDS) must be provided to the Company prior to shipment.

In addition, when and where applicable, Suppliers are expected to comply with the following:

- RoHS (Restriction of Hazardous Substances) in accordance with the most current European Union RoHS Directive.
- REACH (Registration Evaluation Authorization and Restriction of Chemicals) compliance in accordance with the most current list of Substances of Very High Concern (SVHC) as published by the European Chemical Agency (ECHA).
- California's Proposition 65 officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, compliance in accordance with the current list of chemicals to cause cancer or reproductive toxicity published by the California Office of Environmental Health Hazard Assessment (OEHHA).

Protecting Intellectual Property

Suppliers are expected to respect all local and national laws and international treaties in force pertaining to intellectual property and to respect the intellectual property rights of the Company and third parties.



Sight Sciences Ethics and Compliance

Reporting Non-Compliance

This Code supplements but does not supersede any contractual requirements between the Supplier and the Company. We expect our Suppliers to immediately notify the Company of any actual or potential violations of this Code by emailing: compliance@sightsciences.com.

Right to Audit

The Company reserves the right contractually to evaluate, audit, and inspect a Supplier's facilities, books, and business records to verify the Supplier's compliance with the principles described in this Code. The Company may terminate our business relationship with any Supplier that is found to have violated this Supplier Code of Ethics & Conduct.