



GLAUKOS[®]
TRANSFORMING VISION

OUR VISION: THE GLAUKOS CODE OF CONDUCT

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OUR VISION. OUR VALUES.

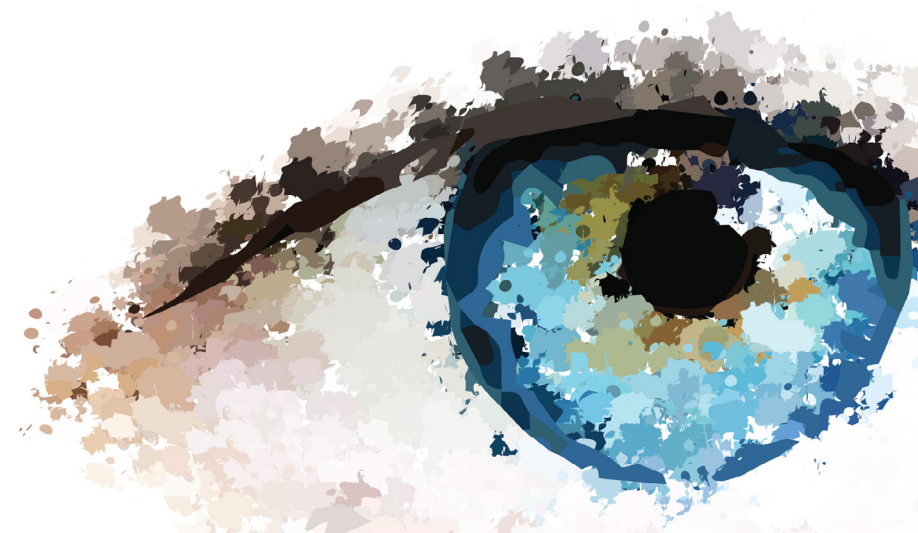
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SEEKING HELP

A Message From Our CEO

Dear colleagues,

At Glaukos, our mission is to transform vision care through innovative, dropless therapies that improve the lives of patients with sight-threatening diseases. Driven by a commitment to innovation and clinical excellence, we are proud to share our updated Code of Conduct. This document reflects our core values of integrity, transparency, and accountability—principles that guide both our internal operations and our engagement with the broader community.

The Code applies to all of us, regardless of position or tenure, and is essential for maintaining the ethical foundation that strengthens our organization. Just as we challenge conventional treatment paradigms with our “We’ll Go First” approach to innovation, we must also ensure that we uphold the highest standards of ethical behavior. I encourage every employee to read and familiarize themselves with the Code, which offers clear guidance on navigating ethical challenges, complying with regulations, and reinforcing our culture of respect, fairness, and responsibility. This is not simply a set of rules—it’s a reflection of who we are as a company and what we stand for as a leader in the medical field.

Finally, I want to remind you of our commitment to fostering an environment where every voice can be heard. If you ever have concerns or encounter any ethical dilemmas, please speak up. We have a strict non-retaliation policy, and your courage in addressing potential issues will help us continue to build an organization we are proud of—one that leads with integrity and never compromises on doing what is right. Together, we can continue to pioneer groundbreaking solutions while upholding the values that define Glaukos.

Sincerely,



THOMAS W. BURNS

Chairman and Chief Executive Officer



Our Vision. Our Values.

WE'LL GO FIRST!

We transform vision by pioneering platforms that improve the standard of care for patients suffering from sight-threatening, chronic eye diseases. Our mantra "We'll Go First" embodies our commitment to quality and compliance while we take chances and push the limits of science and technology to revolutionize treatment paradigms in glaucoma, corneal disorders, and retinal diseases.

Our mission of medical and scientific innovation is spearheaded by our culture of risk-taking, conviction, decisive efficiency, collaboration, compassion, and spirited enthusiasm. That culture is forged by the dedication of a workforce that embraces the values that guide us toward our mission every day.

OUR ATTRIBUTES AND VALUES

DREAM

Innovation, entrepreneurial spirit, pushing the boundaries in productive ways

Aligned Attributes

- Thirst for Victory
- Change Agents
- Integrity

LEAD

Leadership behaviors, financial accountability, leading change

Aligned Attributes

- Courageous
- Conviction
- Resilient/Tenacious
- Responsible
- Decisively Efficient
- Quality
- Spirited Enthusiasm

CARE

Acts of compassion, charity, volunteerism, making a difference at Glaukos or in the community

Aligned Attributes

- Patient Focus
- Work Hard and Remain Humble
- Compassion/Charity
- Collaboration

OUR VISION OF INTEGRITY

At Glaukos, we are committed to conducting business with the highest standards of ethics and integrity. Every individual within our organization is expected to understand and uphold these standards in their daily actions.

Working With Integrity

Speaking Up!

Responding to Concerns

Reporting Inquiries, Complaints, and Adverse Events

Working With Integrity

HOW WE STAY FOCUSED:

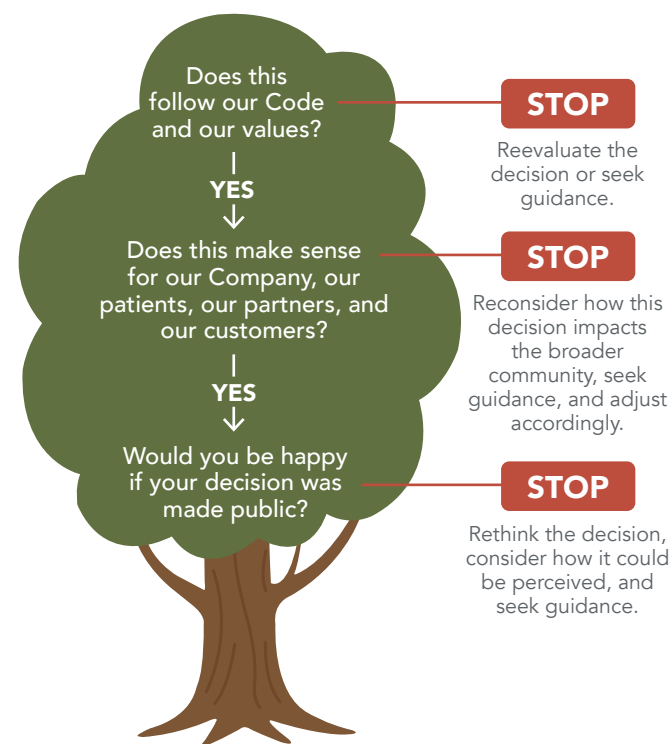
- **Maintain high ethical standards:** The Code of Business Conduct and Ethics outlines the guidelines for conducting business ethically and with integrity, ensuring that every action reflects our commitment to these values.
- **Understand our responsibility:** The Code applies to all employees, officers, Board members, subcontractors, and volunteers. Each individual at Glaukos is responsible for following our policies, regulations, and Code, even when our standards are higher than applicable laws or commercial practices.
- **Protect our reputation:** Quality or compliance failures can harm Glaukos' reputation and damage trust with customers, investors, and regulators. By following the law, regulations, policies, industry codes, and our Code, we help safeguard the Company's image and success.
- **Comply with laws, codes, and regulations:** Employees are obligated to understand and adhere to all laws, regulations, industry codes, and policies that apply to their roles. This includes, but is not limited to, areas like bribery, product safety, intellectual property, privacy, and environmental regulations. If any doubt arises concerning the legality or appropriateness of an action, employees should seek guidance from their supervisor, the Chief Compliance Officer, or General Counsel.

UNDERSTANDING WAIVERS

In rare cases, waivers from specific provisions of the Code may be necessary. Waivers for directors or executive officers can only be issued by the Board of Directors or a committee appointed by the Board. Waivers for other employees must be approved by the Chief Compliance Officer or General Counsel. Waivers for directors or officers will be publicly disclosed if required by law or New York Stock Exchange regulations. Waivers for other employees will be reported to the Audit Committee as necessary.

MAKING ETHICAL DECISIONS

At Glaukos, ethical decision-making is essential to our success and reputation. This framework is designed to help you make choices that align with our Code, uphold our values, and serve the best interests of our company, patients, partners, and customers. By following the decision tree below, you can ensure your decisions reflect the integrity and responsibility that define Glaukos.



This process helps ensure that every decision is thoughtful, ethical, and aligned with our values.

Speaking Up!

HOW WE STAY FOCUSED:

- **Speak up and seek help:** If you encounter a situation that feels uncomfortable or raises ethical concerns, you should address it with your supervisor, Human Resources, any members of the Senior Leadership team, or the Chief Compliance Officer. If you feel uncomfortable doing so, you can contact the Glaukos Compliance Helpline, an anonymous third-party service. Collectively, these options for reporting will be referred to as the reporting channels.
- **Report violations:** We are all required to report any known or suspected violations of the Code, industry codes, laws, regulations, or company policies. Reports can be made to any of the reporting channels.
- **Use the Glaukos Compliance Helpline:** The Glaukos Compliance Helpline is available 24 hours a day, 7 days a week for anonymous reporting. You can contact the Glaukos Compliance Helpline by phone at 1-844-462-5721 or online at www.glaukos.ethicspoint.com. For international resources, please refer to the **Seeking Help** section of our Code.
- **Respect confidentiality:** While every effort is made to maintain confidentiality during investigations, it cannot always be guaranteed. All reports will be handled with as much discretion as possible.
- **Understand consequences:** Any violation of the Code or applicable laws may result in disciplinary action, including termination and legal prosecution.



Q&A

Q I reported a safety violation at my workplace, and now I feel like my supervisor is treating me unfairly. What should I do?

A Retaliation is strictly prohibited. Report the issue to any of the reporting channels immediately to ensure it is investigated.

GLAUKOS' ANTI-RETALIATION STANCE

Glaukos is committed to maintaining an open and safe workplace where employees can raise concerns without fear of retaliation. We strictly prohibit any form of retaliation against individuals who report violations, raise ethical concerns, or cooperate in an investigation. Our anti-retaliation stance applies in every work location, including remote or hybrid working environments. Employees should feel confident that their good-faith reports will be taken seriously, and they will not suffer adverse consequences for coming forward. Retaliation of any kind is not tolerated, and those found engaging in such behavior will face disciplinary action, up to and including termination. If you believe you are experiencing retaliation, it must be reported immediately to any of the reporting channels.

Responding to Concerns

HOW WE STAY FOCUSED:

- **Recognize investigative bodies:** Investigations into reported violations will be conducted by an appointed employee, officer, committee, or third-party entity in accordance with company policies.
- **Cooperate fully:** Employees are required to cooperate fully with all company investigations related to the Code or any other Company matter and keep these matters confidential.
- **Respect impartiality:** Investigations will be conducted fairly and impartially and in compliance with applicable laws, rules, regulations, and policies.
- **Understand consequences:** Failure to cooperate with an investigation may result in disciplinary action, including termination.
- **Cooperate with government requests:** Respond promptly and transparently to any requests from government authorities and immediately escalate all requests to the Legal Department.

Q&A

Q I was asked to participate in an internal investigation, but I'm hesitant to get involved. What should I do?

A You have a duty to cooperate fully in company investigations. Failure to do so may result in disciplinary action, so it's important to participate honestly and openly.

Q&A

Q I am a manager, and one of my employees shared concerns about inappropriate behavior "as a friend." I want to respect their confidence—what should I do?

A Encourage them to report the issue formally to any of the reporting channels, but remind them of your role as their manager and the importance of following proper reporting channels to address the situation effectively.



Reporting Inquiries, Complaints, and Adverse Events



At Glaukos, we take all product inquiries, complaints, and adverse events seriously to ensure product quality and patient safety.

HOW WE STAY FOCUSED:

- **Report promptly:** Employees must report all inquiries, complaints, and adverse events immediately to Medical Safety via email at MedicalSafety@glaukos.com or by phone at 1-888-404-1644.
- **Provide documentation:** Include all available information, such as the nature of the report, product details (e.g., model and serial numbers), and the complainant's information.
- **Follow guidance:** Follow region-specific guidelines for reporting as outlined in relevant procedures.
- **Keep confidentiality:** Ensure all patient information is handled in compliance with privacy laws such as HIPAA.

Q&A

Q What is considered a product complaint?

A Any written, electronic, or oral communication that alleges deficiencies related to the identity, quality, durability, reliability, safety, effectiveness, or performance of a device after it is released for distribution. A complaint is any indication of the failure of a device to meet customer or user expectations for quality or to meet performance specifications.

Q What is considered an Adverse Event (AE) or Adverse Drug Experience?

A An Adverse Event is any injury or issue potentially associated with the use of a product. An Adverse Drug Experience is any adverse event associated with the use of a drug in humans, whether or not considered drug related.

Q How should I report a product issue?

A You can report issues via email at MedicalSafety@glaukos.com or call 1-888-404-1644. Provide as much detail as possible, including product identifiers and a description of the issue.

Q Can I provide medical advice when handling an inquiry?

A No, only medically qualified representatives (e.g., pharmacists, physicians) may respond to medical inquiries using approved reference information.

OUR VISION OF THE WORKPLACE

At the core of our company is the belief in creating a respectful and inclusive environment where everyone feels valued and supported.

Creating and Maintaining a Respectful Workplace

Working Safely

Respecting Human Rights

Protecting Employee Privacy

Managing Conflicts of Interest

Exchanging Gifts and Entertainment

Keeping Accurate Records

Protecting Company Assets

Protecting Intellectual Property

Keeping Data Secure

Maintaining Confidentiality

Communicating Appropriately

Using Social Media Responsibly

Creating and Maintaining a Respectful Workplace

We are committed to being an equal opportunity employer in every aspect of employment, including recruitment, hiring, training, and promotion. Our practices focus solely on merit and qualifications, and we believe in the importance of fostering a diverse and inclusive workplace.

HOW WE STAY FOCUSED:

- **Provide reasonable accommodations:** Ensure employees with disabilities or religious needs receive appropriate accommodations to perform their job effectively.
- **Prohibit discrimination:** Any form of discrimination, whether based on gender, ethnicity, or other personal characteristics, is strictly forbidden.
- **Prevent harassment:** We do not tolerate any form of harassment, whether verbal, physical, or sexual. All employees should treat each other with respect and report any incidents of harassment to any of the reporting channels.
- **Stop bullying:** Bullying or intimidating behavior is unacceptable in our workplace. If you witness or experience bullying, speak up immediately to ensure a safe and respectful environment for everyone.
- **Prevent retaliation:** Protect employees who raise concerns about equal employment opportunities from any form of retaliation.

Q&A

Q A colleague made an inappropriate comment regarding another employee's ethnicity. What should I do?

A You should report the incident to any of the reporting channels immediately.

 **Equal Employment Opportunity (EEO):** A policy ensuring that employment decisions are based on merit and qualifications, without discrimination on personal characteristics.

Discrimination: Any act or omission that directly or indirectly results in the denial of equal treatment or opportunity of an employee based on a protected characteristic such as race, color, religion, sex, sexual orientation, gender identity, age, national origin, citizenship status, disability, genetic information, or veteran status, as well as employer decisions impacting the terms or conditions of employment based on protected characteristics.

Harassment: Any act or omission that directly or indirectly alters employees' work environment, unreasonably interferes with employees' job performance, or creates an intimidating, hostile, or offensive work environment.

Working Safely

Your safety and well-being are paramount. We follow all legal requirements and company standards to ensure a safe and healthy environment.

HOW WE STAY FOCUSED:

- **Report unsafe conditions:** Immediately report any unsafe conditions or hazards to any of the reporting channels to prevent workplace accidents.
- **Use protective equipment:** Properly use and maintain safety equipment to ensure a safe work environment.
- **Inform about health conditions:** Let your supervisor and Human Resources know if a health condition affects your work so appropriate support can be provided.
- **Maintain a drug-free workplace:** Understand that substance use, including prescribed medications affecting your judgment, must be disclosed to Human Resources.
- **Prohibit violence and threats:** No one is allowed to use physical force or threaten others in a way that causes harm or distress.
- **No possession of firearms and weapons:** Firearms and weapons are prohibited in any company-related location.

Q&A

Q I overheard a colleague making threatening remarks about another employee. What should I do?

A Report the incident to any of the reporting channels, as all threats must be taken seriously.



Respecting Human Rights

We uphold human rights and worker rights in every part of our business. This includes equitable treatment, employee security, and supporting freedom of choice in the workplace.

HOW WE STAY FOCUSED:

- **Ensure responsible labor practices:** Uphold responsible labor practices, including equitable pay and safe working conditions.
- **Support unionization rights:** Employees have the right to unionize and collectively bargain, if they choose.
- **Respect international standards:** We are committed to following international human rights laws, including prohibiting child labor and modern slavery in all forms, and we require our vendors and partners to do the same.

Q&A

Q A supplier we work with is known for poor working conditions. Should we continue the relationship?

A No, we require all our partners to adhere to fair labor practices and human rights standards. The relationship should be reassessed to ensure compliance.



Protecting Employee Privacy

We value your privacy and are committed to ensuring your personal information is protected. The Company may collect certain work-related personal information, such as personal identifiable information, employment history, financial information, health information, biometric data, and information related to performance and conduct.

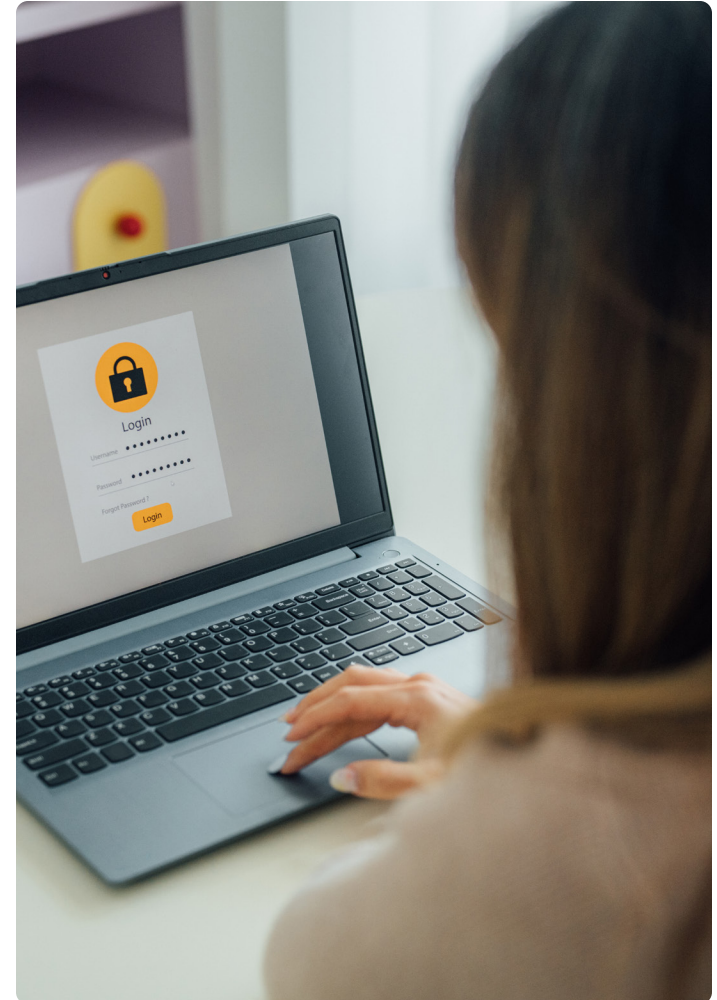
HOW WE STAY FOCUSED:

- **Keep personal data confidential:** All personal information is kept confidential and will not be shared without consent.
- **Only share data when necessary:** We never sell or share personal information without consent, except for legitimate hiring or background check processes.
- **Secure employee information:** Employee data are securely protected throughout your time with the Company to prevent unauthorized access.

Q&A

Q I'm concerned about who has access to my personal records. What should I do?

A You can speak with Human Resources to understand how your personal data are handled and to ensure they are being appropriately protected.



🔍 Personal information: Any data that can be used to identify an individual, either on its own or in combination with other information. Examples include names, addresses, phone numbers, Social Security numbers, and email addresses.

Managing Conflicts of Interest

A conflict of interest arises when personal interests interfere with, or appear to interfere with, the Company's interests. It occurs when personal actions or interests could compromise one's ability to work objectively and fairly. Our responsibility is to avoid any activities that could present, or seem to present, a conflict with the Company's interests.

HOW WE STAY FOCUSED:

- **Speak up about conflicts:** Disclose any potential or actual conflict of interest to any of the reporting channels as soon as it arises.
- **Keep personal interests separate:** Make sure your personal or financial interests don't influence business decisions or impact your duties. Avoid any outside jobs or investments that might conflict with the Company's interests.
- **Avoid business decisions involving family or friends:** Disclose any close relationships that may create a conflict of interest to any of the reporting channels.
- **Be transparent about gifts:** Don't accept gifts or entertainment that could sway your decisions. Report any gifts over a modest value to any of the reporting channels.
- **Participate responsibly in outside activities:** Only engage in outside activities that don't conflict with your job duties or imply company endorsement without approval.
- **Disclose required information:** If you are excluded, debarred, suspended, or otherwise ineligible to participate in U.S. federal healthcare, procurement, or non-procurement programs, you must immediately disclose this to the Chief Compliance Officer. Additionally, disclose if you are under investigation for certain criminal offenses that could lead to exclusion, debarment, or suspension.



Q&A

Q If a supplier we're considering employs my brother, should I mention it?

A Yes, disclose it to avoid any appearance of a conflict.

Q Can I have a romantic relationship with my supervisor or department head?

A Romantic relationships with supervisors or department heads are discouraged, as they can lead to conflicts of interest, favoritism, or perceptions of unfair treatment. If one exists or develops, you must inform Human Resources.

 **Conflict of interest:** A situation where personal interests could compromise professional judgment or the Company's business interests. This includes, but is not limited to, taking Company opportunities for personal gain or making business decisions involving family or friends.

Exchanging Gifts and Entertainment

Building professional relationships through gifts or entertainment is acceptable, but it should never compromise our integrity or influence business decisions.

HOW WE STAY FOCUSED:

- **Refuse inappropriate gifts:** Respectfully decline gifts or entertainment that could be seen as an attempt to influence a business decision. Gifts should be modest, legal, customary, and given without expecting anything in return.
- **Report gifts of high value:** If you are unable to refuse a gift, report it immediately to any of the reporting channels.
- **Exercise caution with international gifts:** Be aware of additional risks when exchanging gifts with international contacts.

NO GIFTS OR ENTERTAINMENT TO GOVERNMENT OFFICIALS OR HEALTH CARE PROFESSIONALS (HCPS)

Do not give gifts to government employees or health care professionals. Gifts to government officials or health care professionals are strictly prohibited, and you should never offer them in any context.

Q&A

Q A potential client from overseas brought me a valuable piece of jewelry as a gift. Should I accept it?

A No, you should not accept high-value gifts, especially from potential clients, as this may give the appearance of impropriety. Report it to any of the reporting channels.

Q A vendor has offered me tickets to a sporting event. Can I accept them?

A Maybe, but it depends. Accepting tickets is okay if it's reasonable and doesn't look like it could influence your decisions. If it seems inappropriate, politely decline. When in doubt, contact any of the reporting channels.



Keeping Accurate Records

Our records are the foundation of our business decisions, financial reports, and regulatory submissions. They can also expose us to, or protect us from, liability.

HOW WE STAY FOCUSED:

- **Ensure accuracy in records:** Maintain complete, accurate, and reliable records in all aspects of business.
- **Follow document-retention policies:** Make sure records are organized, stored, and accessible according to company guidelines.
- **Disclose financial information accurately:** Employees involved in financial reporting must ensure compliance with accounting standards and regulations.
- **Ensure timely reporting:** Ensure all financial reports and related responsibilities are completed and submitted promptly, supporting accurate and up-to-date information for decision-making and compliance requirements.
- **Monitor for suspicious activity:** Stay vigilant for unusual or unauthorized actions, such as unexpected transactions, and promptly report any suspicious activity to maintain security and prevent potential risks.

Q&A

Q I realized there's an error in a financial report that was just submitted. What should I do?

A Immediately report the error to your supervisor, and work to correct it as soon as possible. Accuracy in records is essential to maintain trust and compliance.



Protecting Company Assets

We all play a role in safeguarding company assets, ensuring they are used only for legitimate business purposes.

HOW WE STAY FOCUSED:

- **Prevent misuse of company assets:** Only use company property, whether physical, financial, or intellectual, for authorized purposes.
- **Report any theft or damage:** Notify any of the reporting channels immediately if you notice any misuse or damage to company assets.
- **Understand communication policies:** Be aware that communications through company systems may be monitored and must comply with company standards.

 **Company assets:** Any property, including physical, financial, or intellectual resources owned or controlled by the Company, used to conduct business operations.



Protecting Intellectual Property

Protecting intellectual property (IP) is essential to safeguard a company's innovations, maintain its competitive edge, and uphold ethical and legal standards.

HOW WE STAY FOCUSED:

- **Safeguard proprietary information:** Keep the Company's intellectual property secure and prevent unauthorized sharing.
- **Respect third-party information:** Adhere to any agreements regarding intellectual property shared by partners, suppliers, or competitors. We protect third-party software by using it properly, following licensing rules, and avoiding piracy.
- **Respect company ownership of intellectual property:** Any intellectual property, such as inventions, designs, or other creations developed during your employment, belongs to Glaukos. Always ensure that IP created in the course of your work is appropriately disclosed and protected by the Company.
- **Don't share nonpublic information:** Ensure that confidential company information is not shared without proper authorization.

Q&A

Q I have access to nonpublic, proprietary research from a competitor that could benefit our company. Can I use it?

A No, you cannot use proprietary information from competitors. Sharing or using such information would violate our policies and could result in legal consequences.



Keeping Data Secure

Confidential information is a critical part of our business, and safeguarding it is a key responsibility for all employees.

HOW WE STAY FOCUSED:

- **Protect confidential information:** Ensure that Glaukos' and our partners' confidential data are kept secure and confidential, no matter where those data are accessed from.
- **Protect data access:** Do not copy Glaukos data to non-Glaukos computer assets. All Glaukos data should reside within the Glaukos environment, including SharePoint, OneDrive, and Glaukos Systems.
- **Get consent for personal data use:** Always obtain the necessary consent before collecting or using personally identifiable information.
- **Avoid sharing confidential information with AI tools:** Do not input any confidential or proprietary company information into artificial intelligence tools or platforms unless explicitly approved. Always ensure sensitive data are protected and not exposed to unauthorized systems. Follow our rules regarding AI tools, and see the *Glaukos Corporate Artificial Intelligence Policy* for additional details.
- **Avoid unauthorized disclosure:** Refrain from sharing sensitive information unless you are authorized to do so.
- **Dispose of data properly:** Ensure all sensitive data are disposed of securely, following company protocols to prevent unauthorized access and protect privacy.

- **Use authorized systems only:** Access and manage data exclusively on Glaukos-approved systems, software, devices, and applications to ensure security and compliance, especially in critical, patient-facing roles.
- **Report breaches immediately:** Promptly report any data breaches or security incidents to comply with regulatory requirements and enable swift action to mitigate potential risks.
- **Seek guidance:** Please reference the *Information Security Policy* for additional information.

Q&A

Q Can I use an AI tool to generate a report using confidential Company data?

A No, you should not use any confidential data with AI tools unless you have clear approval from the Software Approval Board, and it follows company policy. AI tools could disclose Glaukos confidential data to third parties.

 **Confidential information:** Any nonpublic data, such as trade secrets, personal information, or proprietary research, that must be protected from unauthorized access or disclosure.

Maintaining Confidentiality

Employees and directors have access to confidential information about the Company. It's essential to protect this information, as unauthorized disclosure could harm the Company, its customers, or business partners.

HOW WE STAY FOCUSED:

- **Protect nonpublic information:** Safeguard all nonpublic data that could be useful to competitors or harmful to the Company if disclosed.
- **Share information only as needed:** Only provide confidential information to employees or directors who need it for their roles.
- **Handle personal data responsibly:** Collect and use personally identifiable information (PII) with proper notice and consent, following legal and company guidelines.
- **Keep protecting confidentiality after leaving:** Your duty to protect confidential information continues even after you leave the Company. Unauthorized disclosure can result in harm and legal consequences.



Q&A

Q I overheard sensitive business information being discussed in a public place. What should I do?

A Remind your colleagues to avoid discussing sensitive information in public spaces, and don't share the information with others.

 **Confidential information:** Any nonpublic data, such as trade secrets, personal information, or proprietary research, that must be protected from unauthorized access or disclosure.

Communicating Appropriately

Only designated spokespersons, including the CEO, CFO, COO, and Head of Investor Relations, are authorized to speak on behalf of the Company, especially when dealing with financial or media inquiries.

HOW WE STAY FOCUSED:

- **Direct inquiries to the right person:** Refer all media or financial inquiries to the designated spokespersons.
- **Report communication mistakes:** If you make an error in sharing company information, report it to your supervisor or a member of the Legal team rather than trying to fix it yourself.
- **Comply with Regulation Fair Disclosure (Regulation FD):** Material company information that could influence an investor's decision must be shared with the public at the same time as it is shared with investors or market professionals. Avoid disclosing nonpublic, material information to anyone outside the Company.
- **Report violations:** If you suspect a violation of our policy or Regulation FD, report it immediately to any of the reporting channels.

 **Regulation Fair Disclosure (Regulation FD):** A rule that requires public companies to share important information with all investors at the same time and prevents selective disclosure that could give some investors an unfair advantage.

Q&A

Q I was discussing financial results with a friend who is also an investor. Should I report this?

A Yes, if the information is nonpublic and material, disclosing it to anyone, including friends, could be a violation. Report the situation to any of the reporting channels immediately.



Using Social Media Responsibly

Social media is a valuable tool for personal expression, but employees must use it responsibly and ensure their posts do not negatively impact Glaukos or violate company policies.

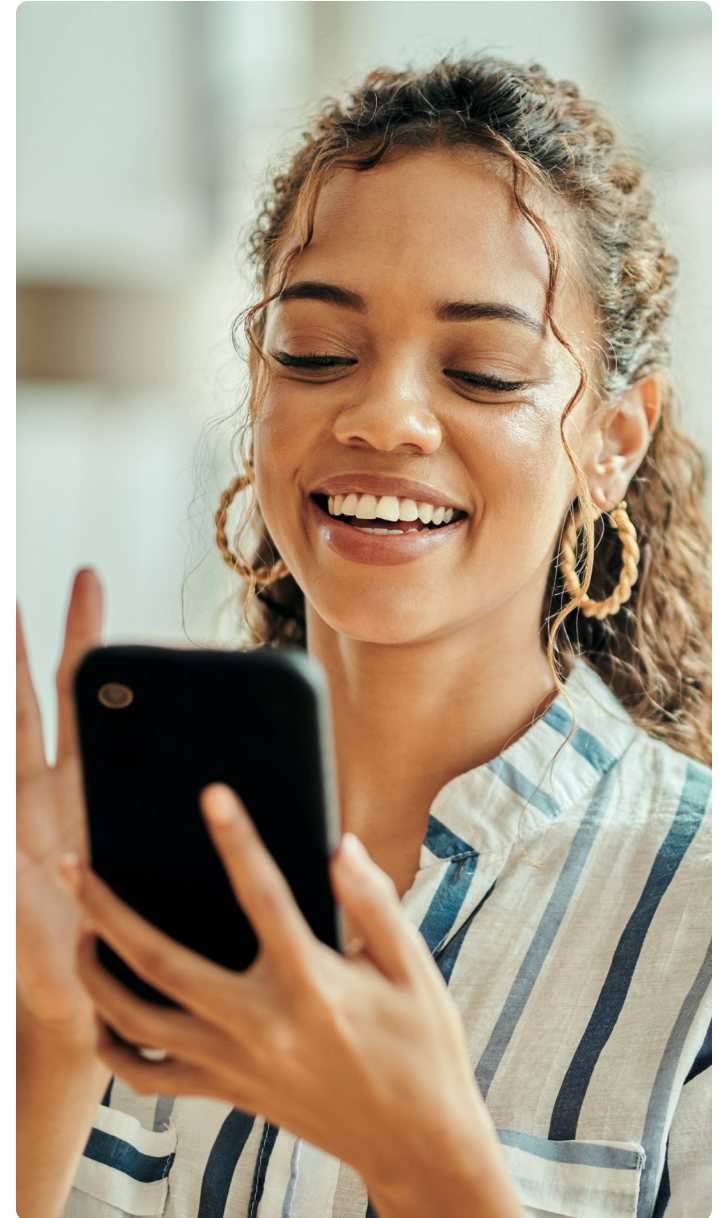
HOW WE STAY FOCUSED:

- **Do not speak on behalf of the Company:** Only authorized spokespersons may represent Glaukos on social media. Avoid making any posts that imply you are speaking for the Company unless you are specifically authorized to do so.
- **Post responsibly:** Be mindful of how your posts, comments, or shares could reflect on Glaukos. Avoid content that could damage the Company's reputation or breach confidentiality.
- **Keep personal and professional boundaries:** Ensure that your personal social media activities are clearly separate from your professional role at Glaukos. Refrain from sharing confidential or proprietary company information.
- **Follow the rules:** All Glaukos employees must follow the guidelines in our *Corporate Communication & Disclosure Controls Policy for All Employees* and our *Social Media Guidance*.

Q&A

Q I want to share a work-related success story on my personal social media (e.g., LinkedIn) account. Can I do that?

A You should avoid sharing company-related information on personal accounts unless it has been approved for public release, and you have permission from your supervisor or the Communications Team. This includes press releases and other communications intended for the investor community.



OUR VISION OF THE MARKETPLACE

At the heart of our business is the commitment to providing exceptional products while upholding the highest standards of ethics, safety, and customer privacy.

- Providing Quality Products
- Communicating Appropriately About Products
- Interacting With Health Care Professionals and Customers
- Interacting With Patients and Patient Groups
- Protecting Customer Privacy
- Working With Third Parties
- Interacting With the Government
- Preventing Fraud

Providing Quality Products

Our top priority is developing safe and effective products that promote the health and safety of our customers.

HOW WE STAY FOCUSED:

- **Commit to safety and compliance:** Ensure that our products meet the highest safety standards and applicable regulations.
- **Report Adverse Events promptly:** Immediately report any complaints or Adverse Events to the corporate office or Medical Safety via email, phone, or Salesforce, regardless of the details available. Include key details such as the complainant's name, date of awareness, description of the event, product details (model, lot, or serial numbers), and whether the product contacted the patient or caused an injury. Refer to our *Basic Inquiry, Complaint, & Adverse Event Reporting Policy* for further information.
- **Exceed customer expectations:** We are dedicated to developing safe and innovative products with impeccable customer support.
- **Meet regulatory requirements:** We share an unwavering commitment to ensure that our quality system is effective, process driven, and compliant with regulatory requirements.
- **Innovate responsibly:** Focus on continuous improvement and innovation to exceed customer expectations.



Communicating Appropriately About Products

The Company operates in the healthcare industry, and strict federal, state, and international laws, as well as industry codes, regulate our interactions with health care professionals. These professionals include anyone involved in prescribing, dispensing, administering, or purchasing our products, as well as those who influence their use.

HOW WE STAY FOCUSED:

- **Ensure legitimate business purpose:** Every interaction with health care professionals must serve a valid and legal business purpose.
- **Respect medical judgment:** Avoid any actions that could interfere with a health care professional's independent judgment or medical decision-making.
- **Comply with the Code of Ethics:** Adhere to the Company's *Code of Ethics on Interactions with Health Care Professionals* and all relevant laws and industry codes. Do not offer anything of value as an improper inducement, including payments, kickbacks, bribes, or rebates to influence decisions regarding prescribing, purchasing, using, leasing, or recommending our products or services.
- **Practice fair advertising and marketing:** Ensure that all advertising and marketing materials are truthful, fair, balanced, not misleading, and accurately represent our products and services in line with approved package inserts or labels. Avoid exaggerations or false claims, and always adhere to applicable industry codes, laws, and regulations governing advertising and marketing practices.
- **Avoid disparaging competitor products:** Focus on highlighting the strengths of our offerings without making negative or disparaging remarks about competitors' products, ensuring a professional and respectful approach.



Q&A

Q How should I handle promotional activities with health care professionals?

A All promotional activities must serve a legitimate business purpose, align with ethical standards, and avoid undue influence on health care professionals' decisions.

Health care professional: Individuals who purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe medical technology or pharmaceutical products. This definition encompasses anyone who may have influence over purchasing or prescribing decisions and includes both clinical and nonclinical individuals and decision-makers within hospitals, medical practices, group purchasing organizations, and other healthcare organizations.

Interacting With Health Care Professionals and Customers

At Glaukos, we are committed to maintaining the highest standards of integrity and transparency in all interactions with health care professionals and customers. These relationships are critical to achieving our mission of transforming vision care while upholding ethical and legal standards.



HOW WE STAY FOCUSED:

- **Avoid improper influence:** We are prohibited from giving anything of value to influence the decisions or actions of health care professionals. This includes:
 - **Monetary gifts:** Cash, gift cards, or any direct financial incentives.
 - **Gifts and entertainment:** Items like meals, travel, accommodations, tickets to events, or other noncash gifts.
 - **Services or benefits:** Free or discounted products, consulting fees, honoraria, or speaking engagements.
 - **Educational or research grants:** Financial support for research, educational events, or professional development that may be tied to the use or promotion of the Company's products.
 - **Rebates or discounts:** Unusual or excessive discounts that could be viewed as incentives.
 - **Charitable donations:** Contributions made in the name of the health care professional or to their preferred charities, especially if linked to prescribing behavior.
 - **Personal or non-patient use items:** Items such as office supplies, scrubs, tablets, smartphones, or laptops.
 - **Branded promotional items:** Even if related to work or patient care, items such as pens, notepads, mugs, or items with company logos.

 **Health care professional:** Individuals who purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe medical technology or pharmaceutical products. This definition encompasses anyone who may have influence over purchasing or prescribing decisions and includes both clinical and non-clinical individuals and decision-makers within hospitals, medical practices, group purchasing organizations, and other healthcare organizations.

Interacting With Health Care Professionals and Customers

- **Market with integrity:** We act with integrity in all marketing practices, including labeling, promotional programs, product samples, and communications with stakeholders.
- **Communicate honestly:** We provide timely and accurate information about our products to health care professionals, regulators, patients, and consumers, including data on efficacy and safety.
- **Avoid conflicts of interest:** We recognize that interactions with health care professionals may create actual or perceived conflicts of interest. To mitigate these risks, we support the disclosure of financial and other relationships in research, education, or clinical practice.
- **Focus on customers:** We strive for customer satisfaction by listening to their needs and creating mutually beneficial solutions, avoiding illegal or unethical activities such as bribery, false advertising, or disparaging competitors' products.

Q&A

Q I'm attending a meeting with a physician who frequently prescribes our product. Can I offer them a personal gift as a gesture of goodwill?

A No, you should not offer personal gifts to health care professionals. Any interaction must comply with the *Code of Ethics on Interactions with Health Care Professionals* and avoid even the appearance of improper influence.

Q What should I do if I suspect a colleague is offering improper incentives to a health care professional?

A Report the concern to any of the reporting channels immediately.



Interacting With Patients and Patient Groups

At Glaukos, we are committed to maintaining the highest standards of integrity and transparency in all interactions with health care professionals, customers, and patient groups. These relationships are critical to achieving our mission of transforming vision care while upholding ethical and legal standards.

HOW WE STAY FOCUSED:

- **Collaborate with patient groups and patients:** Integrity and transparency guide our collaboration with patient groups and patients throughout the product life cycle. This includes areas such as drug development, regulatory approval, access, health policy, and clinical trial design. Sustainable partnerships with patient groups provide valuable insights and experiences that influence our work across therapeutic areas.
- **Keep high standards of conduct:** All collaborations with patient groups and patients are based on the principles of integrity, independence, respect, equity, transparency, and mutual benefit.
- **Support transparency:** We disclose financial and in-kind support provided to patient groups to maintain public trust and align with stakeholder expectations.
- **Respect stakeholders:** Patient groups and patients are respected as essential collaborators, and all interactions prioritize their independence and well-being.
- **Protect personal data:** We ensure that any personal data shared during collaborations are handled with the utmost care, adhering to privacy laws, regulations, industry codes, and company policies.

Q&A

Q Can I offer a financial contribution to a patient group in exchange for their public support of our product?

A No, this is not permitted. You must respect the independence of the patient group and cannot use them as a marketing tool.

Q What should I do if I receive personal data from patients while collaborating with a patient group?

A You are responsible for ensuring that personal data are adequately protected and managed according to privacy regulations and company standards.

 **Patient groups:** Organizations or collectives that advocate for patients' needs and interests, provide support, or represent specific patient communities. These groups play a critical role in influencing health policy, research, and education.

Protecting Customer Privacy

At Glaukos, we are committed to safeguarding the privacy and security of our customers' personal information. We must handle customer data responsibly, ensuring compliance with all applicable privacy laws, regulations, industry codes, and company policies.

HOW WE STAY FOCUSED:

- **Handle personal data with care:** Ensure that all customer data are collected, stored, and processed in accordance with privacy laws, regulations, industry codes, and company policies.
- **Limit processing and storage:** We collect only the personal information that is necessary and relevant to the purpose for which it is collected. We store that personal information for no longer than is necessary to fulfill that purpose.
- **Protect against unauthorized access:** Keep customer data secure from unauthorized access or misuse by following proper data-protection protocols.
- **Obtain proper consent:** Always ensure you have the necessary consent before collecting, using, or sharing a customer's personal information.
- **Vet business partners:** We only engage with third parties who have acceptable security and privacy controls in place and guarantee the effectiveness of those controls before providing them with access to personal information.
- **Report data breaches:** We are required to immediately report any suspected data breaches to any of the reporting channels.

Q&A

Q I've been asked to share customer data with a third-party vendor. Can I do this?

A You must ensure the vendor complies with privacy regulations and company policies. Only share customer data after confirming that proper safeguards and consents are in place.



Working With Third Parties

We hold our suppliers to the same ethical standards that we follow.

HOW WE STAY FOCUSED:

- **Ensure ethical sourcing:** Work only with suppliers who comply with our *Supplier Code of Conduct* and our *Distributor Anti-Corruption Compliance Policy*.
- **Uphold human rights:** Ensure that suppliers respect human rights and provide fair wages and safe working conditions.
- **Monitor third parties:** Third parties must adhere to all applicable laws, industry codes, and regulations. To manage the risks that third parties may introduce, we conduct thorough due diligence of our distributors to ensure compliance and safeguard our business interests.
- **Demand transparency:** Require suppliers to follow anti-corruption laws and be transparent about their quality systems and sourcing of materials, including conflict minerals.

Q&A

Q I've found a supplier that can significantly reduce costs but doesn't follow labor standards. Should we proceed?

A No, all suppliers must comply with our *Supplier Code of Conduct*, including respecting labor laws and human rights. Cost saving cannot come at the expense of ethical practices.



Interacting With the Government

We ensure that all interactions with government officials or entities adhere to applicable laws, regulations, industry codes, our policies, and ethical guidelines.

HOW WE STAY FOCUSED:

- **Follow laws and ethical guidelines:** Ensure that all dealings with government authorities and officials and government-owned businesses or entities are truthful, accurate, lawful, and ethical.
- **Seek approval for government interactions:** Always seek approval from the Chief Compliance Officer before offering anything of value to government officials.

Q&A

Q A government official asked for a “favor” to expedite a permit. Should I comply?

A No, offering anything of value to a government official in exchange for an expedited service is a form of bribery. Report the request to any of the reporting channels immediately.

Q **Government official:** Anyone who works for or represents a government entity, including employees of government-owned hospitals or healthcare facilities.



Preventing Fraud

At Glaukos, we are committed to honesty and accuracy in all aspects of our business. Fraud damages trust, harms our reputation, and violates both our Code and the law. We all share a responsibility to prevent and report fraudulent behavior.

HOW WE STAY FOCUSED:

- **Act with integrity:** Ensure all documents, reports, and records are truthful, complete, and accurate.
- **Identify and report fraud:** If you suspect or witness fraud, such as falsifying records, manipulating data, or dishonest reporting, report it immediately to any of the reporting channels.
- **Safeguard resources:** Use company resources only for legitimate business purposes, and report any misuse or misappropriation.
- **Understand consequences:** Fraudulent actions will lead to disciplinary measures, up to and including termination and legal action.



Q&A

Q A colleague asked me to adjust numbers on a report to “make the department look better.” Is this acceptable?

A No, altering information to mislead is considered fraud. You should refuse the request and report the situation to any of the reporting channels. Accurate and honest reporting is essential to maintaining our integrity.

 **Fraud:** The intentional false representation or concealment of a material fact deliberately practiced in order to secure unfair or unlawful gain.

OUR VISION OF SOCIETY

At Glaukos, we believe in engaging with our community, conducting business with integrity, and adhering to legal standards in every aspect of our operations.

- Engaging With Our Community
 - Engaging in Politics
 - Competing Fairly
- Preventing Bribery and Corruption
- Respecting International Trade Laws
- Preventing Insider Trading
- Promoting the Environment and Sustainability
- Following Regulations

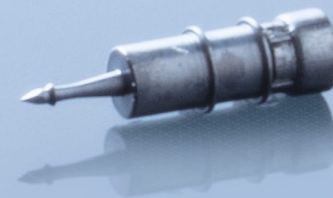
Engaging With Our Community

We recognize our role in society and understand the importance of ethical engagement, whether through community initiatives or participation in political activities.

HOW WE STAY FOCUSED:

- **Support underserved regions:** We donate products to underserved communities worldwide, ensuring access to sight-saving treatments.
- **Be philanthropic:** For every iDose TR sold, we make an additional iDose unit available at no cost to qualifying charities, expanding access to crucial glaucoma treatments.
- **Encourage volunteerism:** Glaukos employees receive 16 hours of paid volunteer time off annually, allowing them to give back to their communities and support local causes.
- **Partner with humanitarian organizations:** Through partnerships with over 130 charities in over 50 countries, we've provided glaucoma devices and training to surgeons in underserved areas.
- **Commit to communities and access:** We are dedicated to supporting underserved communities through philanthropy, volunteerism, and partnerships that expand access to sight-saving therapies to better support our communities.
- **Enhance global healthcare education:** We sponsor training programs for international surgeons, expanding the reach of cutting-edge glaucoma treatments to regions with limited resources.

iDose[®] TR 
(travoprost intracameral
implant) 75 mcg



Engaging in Politics

Company resources, such as funds or assets, cannot be used for political contributions without written approval from the Chief Compliance Officer.

HOW WE STAY FOCUSED:

- **Keep political activities personal:** Ensure that any political activity is personal and separate from the Company.
- **State personal views clearly:** Make it clear that personal political opinions are not reflective of Glaukos' position.
- **No political reimbursements:** Glaukos will not reimburse employees for personal political contributions.

Q&A

Q I'm attending a political rally on my own time. Can I mention my role at Glaukos while advocating for the cause?

A No, you should not associate your personal political activities with Glaukos, as the Company must remain neutral in political matters.



Competing Fairly

We are committed to competing ethically and in compliance with antitrust laws.

HOW WE STAY FOCUSED:

- **Understand antitrust principles:** Employees must have a basic understanding of antitrust laws relevant to their roles.
- **Deal fairly with others:** Treat fellow employees, collaborators, licensors, customers, suppliers, and competitors with fairness. Avoid manipulation, misuse of privileged information, or any unfair practices.
- **Avoid competitor discussions:** Do not discuss sensitive topics such as pricing, terms and conditions, costs, or market segmentation with competitors, as this can lead to anticompetitive practices.
- **Prohibit boycotts and trade restrictions:** Refrain from engaging in any activities that involve boycotting competitors or restricting trade, ensuring all business practices align with fair competition laws.
- **Limit interactions at industry events:** Be cautious during association meetings where competitors are present to avoid any conversations that could be perceived as collusion or sharing competitive information.
- **Gather competitive intelligence ethically:** When collecting information about competitors, use only lawful and ethical methods. Never use deception, theft, or any improper means to obtain competitive data, and always respect confidentiality agreements. Do not use third parties to procure competitor information unethically. Always follow ethical standards in market intelligence gathering.
- **Avoid anticompetitive behavior:** Actions that violate antitrust laws, such as price-fixing or unfair practices, can result in significant fines and damage to the Company's reputation.



Q&A

Q A competitor suggests we agree on a mutual price increase to avoid undercutting each other. What should I do?

A Refuse the suggestion, and immediately report the conversation to the Legal Department, as this would violate antitrust laws.

🔍 Antitrust laws: Laws designed to promote fair competition and prevent monopolistic behavior, price-fixing, or other practices that restrict competition in the marketplace.

Preventing Bribery and Corruption

Bribery is strictly prohibited at Glaukos, and involves offering, giving, receiving, or soliciting any item of value to influence the actions of an official or other person, whether in dealings with government officials or private individuals.

HOW WE STAY FOCUSED:

- **No bribery:** Never offer, promise, give, authorize, or accept bribes or anything of value to gain an unfair advantage.
- **No facilitation payments:** We don't make payments to government officials to speed up routine tasks unless through official fees permitted by law.
- **Keep accurate records:** All business records and financial transactions must be recorded accurately.
- **Work with ethical partners:** We only work with third parties who have completed our due diligence process, follow our anti-bribery rules, and do not engage in bribery. Our partners cannot bribe on our behalf.
- **Interact compliantly with health care professionals:** Ensure all interactions with health care professionals linked to government or regulatory bodies comply with relevant laws, industry codes, and anti-kickback and transparency regulations.
- **Report any demands:** If asked to make an improper payment, refuse and report it immediately to any of the reporting channels.
- **Follow guidelines when dealing with government officials:** Always adhere to specific rules when interacting with government officials, and ensure you receive approval from Legal or the Chief Compliance Officer before offering anything of value.
- **Know the law:** Understand and follow all anti-bribery laws where we operate, and understand violations carry severe consequences for both the Company and individuals.
- **Provide acceptable gifts and entertainment (G&E):** Provide gifts and entertainment only when there is a legitimate business need and in strict accordance with Company policy and industry codes.



Q&A

Q Can I approve paying for a government official's travel to our facility?

A No, report this to any of the reporting channels. Payments to government officials need approval.

Respecting International Trade Laws

When conducting international business, we must comply with import, export, and counterterrorism regulations.

HOW WE STAY FOCUSED:

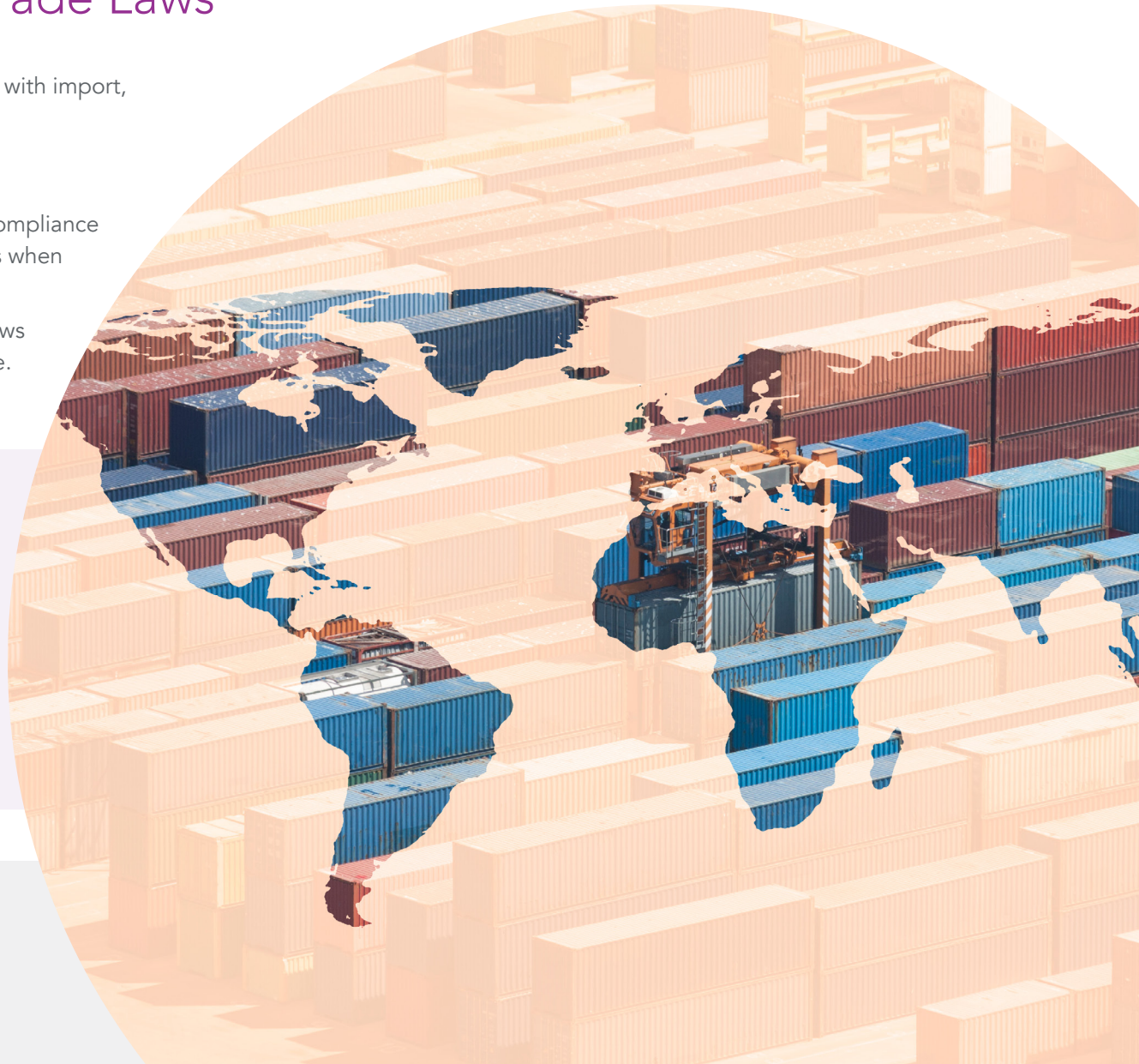
- **Follow international trade regulations:** Ensure full compliance with current import, export, and counterterrorism laws when conducting global business.
- **Understand the consequences:** Violations of trade laws can result in fines, sanctions, and reputational damage.

Q&A

Q I'm preparing a shipment for an international client, but I'm unsure whether it complies with export regulations. What should I do?

A You should consult with your supervisor or Chief Compliance Officer to confirm compliance with the relevant export regulations before proceeding.

Q **International trade laws:** Rules governing the legal exchange of goods, services, and capital across international borders, including export and import regulations and counterterrorism measures.



Preventing Insider Trading

We are prohibited from trading Glaukos stock or securities while in possession of material, nonpublic information.

HOW WE STAY FOCUSED:

- **Do not use insider information:** Never trade Glaukos stock or securities based on nonpublic information. Immediate family members are also prohibited from trading Glaukos stock if you or they possess material, nonpublic information.
- **Avoid giving tips:** Do not provide recommendations or tips to others based on insider information.
- **Follow our policies and procedures:** Consult our *Insider Trading and Tipping Policy* for further guidance.
- **Report violations:** If you suspect any insider trading, report it immediately to any of the reporting channels.



Q&A

Q I overheard confidential information about an upcoming product approval that could impact Glaukos' stock. Can I share this with a friend who invests in the Company?

A No, sharing nonpublic information, even with a friend, is a violation of insider trading laws. You should report this situation to any of the reporting channels.

 **Insider trading:** The illegal act of buying or selling stock or securities based on material, nonpublic information that could affect an investor's decision.

Promoting the Environment and Sustainability

Glaukos is focused on minimizing environmental impact through resource conservation, sustainable packaging, and emission management. Our environmental approach aligns with our mission to improve global health responsibly.

HOW WE STAY FOCUSED:

- **Measure emissions:** We actively monitor greenhouse gas (GHG) emissions and prioritize energy efficiency, exploring renewable energy sources to reduce our carbon footprint.
- **Use sustainable packaging:** We are making efforts to transition to biodegradable and recyclable packaging, including compostable cold-chain shipping materials, to minimize waste and reliance on nonrenewable resources.
- **Reduce waste:** Our focus on reducing, reusing, and recycling materials in our facilities aims to minimize waste output.
- **Conserve water:** We employ water-saving practices and monitor consumption closely to ensure efficient use across our operations.
- **Procure sustainable materials:** We aim to work with suppliers who share our environmental values, extending sustainable practices throughout our supply chain.

Q&A

Q How does Glaukos manage waste from manufacturing?

A We reduce waste through recycling, using eco-friendly materials, and responsibly disposing materials to minimize landfill contributions.



Following Regulations

The U.S. Food and Drug Administration (FDA) and other international competent authorities regulate many aspects of our product development and distribution.

HOW WE STAY FOCUSED:

- **Understand FDA standards:** Familiarize yourself with the FDA regulations and any other international standards that apply to your role.
- **Report noncompliance:** If you become aware of any violations of FDA laws or laws of any country where we sell products, report them immediately to avoid legal and regulatory consequences.

Q&A

Q I discovered that a batch of our products may not meet FDA standards. What should I do?

A You should report this immediately to any of the reporting channels to ensure the issue is addressed and compliance is maintained.



SEEKING HELP

Seeking Help

Report violations: We are all required to report any known or suspected violations of the Code, laws, regulations, industry codes, or Company policies.

If you encounter a situation that feels uncomfortable or raises ethical concerns, you should address it with your supervisor, Human Resources, any members of the Senior Leadership team, or the Chief Compliance Officer. If you feel uncomfortable doing so, you can contact the Glaukos Compliance Helpline, an anonymous third-party service. Collectively, these options for reporting are referred to as the reporting channels.

Use the Glaukos Compliance Helpline:

The Glaukos Compliance Helpline is available 24 hours a day, 7 days a week, for anonymous reporting. You can contact the Glaukos Compliance Helpline by phone at 1-844-462-5721 or online at www.glaukos.ethicspoint.com.



Seeking Help

COUNTRY	REPORTING OPTION
Armenia	Web submission only
Australia	Dial 1-800-551-155 (Optus) or 1-800-881-011 (Telstra), then dial 844-462-5721
Belgium	Dial 0-800-100-10, then dial 844-462-5721
Brazil	Dial 0-800-890-0288 or 0-800-888-8288 (TIM), then dial 844-462-5721
Canada	Dial 844-462-5721
Colombia	Dial 01-800-911-0010 or 01-800-911-0011 (Spanish), then dial 844-462-5721
France	Dial 0-800-99-0011 (Orange) or 0805-701-288 (Telecom Development), then dial 844-462-5721
Germany	Dial 0-800-225-5288, then dial 844-462-5721
India	Dial 000-117, then dial 844-462-5721
Ireland	Dial 1-800-550-000 or 00-800-222-55288 (UIFN), then dial 844-462-5721
Israel	Web submission only
Japan	Dial 00-539-111 (KDDI), 0034-811-001 (NTT) or 00-663-5111 (Softbank Telecom), then dial 844-462-5721
Mexico	Dial 800-288-2872 or 800-112-2020 (Por Cobrar), then dial 844-462-5721
Netherlands	Dial 0800-022-9111, then dial 844-462-5721
New Zealand	Dial 000-911, then dial 844-462-5721
Norway	Dial 800-190-11, then dial 844-462-5721
Philippines	Dial 105-11 or 1010-5511-00 (PLDT), then dial 844-462-5721
Portugal	Web submission only
Singapore	Dial 800-011-1111 (SingTel) or 800-001-0001 (StarHub), then dial 844-462-5721
Spain	Dial 900-99-0011, then dial 844-462-5721
Sweden	Dial 020-799-111, then dial 844-462-5721
Switzerland	Dial 0-800-890011, then dial 844-462-5721
United Arab Emirates	Dial 8000-021 or 8000-555-66 (du), then dial 844-462-5721
United Kingdom	Dial 0-800-89-0011, then dial 844-462-5721
United States	Dial 844-462-5721

