



Code of Business Conduct and Ethics

Dear Colleagues,

At Sight Sciences, we all are responsible for understanding the important legal and ethical issues that affect our business and for acting with integrity at all times. Integrity means more than just complying with the law. It is one of Sight Sciences' core values. It reflects who we are as a company and as individuals. Conducting ourselves with integrity helps us earn the trust and respect of the people we serve.

This Code of Business Conduct and Ethics ("**Code**"), along with our written compliance policies, are essential resources for all colleagues. They outline Sight Sciences' policies on business conduct and identify the people who can answer any questions you might have about compliance-related issues. I am asking that you familiarize yourself with the Code and rely upon it as a reference to help ensure that you remain in compliance with all policies and procedures that apply to your work.

Please know that all of Sight Sciences' leaders are available to you if you have any concerns related to company practices or activities. Seeking advice, raising concerns, or reporting misconduct cannot and will not be held against you. Our open door and anti-retaliation policies are in place to encourage and protect colleagues who raise concerns.

Our commitment to doing the right thing, which means complying with both the spirit and the letter of the laws that govern our industry, gives us a competitive advantage. Acting with integrity depends on each of us giving our full commitment. The responsibility lies with all of us.

Thank you for all of your hard work and continued commitment to making Sight Sciences great.

Yours Truly,



Paul Badawi
Chief Executive Officer

INTRODUCTION

At Sight Sciences, Inc. (“**Sight Sciences**” or the “**Company**”), we value our integrity above all else. As an employee or representative of Sight Sciences, we expect you to support our integrity by behaving lawfully and ethically at all times. This Code of Business Conduct and Ethics (“**Code**”) serves as one of the guideposts for your behavior and is an integral part of our comprehensive compliance program (“**CCP**”).

In general, we expect you to:

- Comply with all applicable laws, rules, regulations and with all Company policies and procedures;
- Use your own personal good judgment;
- Take responsibility for your actions and follow through on your commitments;
- Avoid situations where your personal interests are, or appear to be, in conflict with the Company's interests;
- Protect and properly use Sight Sciences’ information, assets, and resources;
- Protect information that is owned by our customers and vendors;
- Safeguard non-public information and refrain from using that information for personal gain;
- Communicate in an honest and open manner; and
- Adhere to Sight Sciences’ standards for protecting the environment and the safety and health of our employees, our customers, our community, and our contractors.

This Code sets forth some general principles that you must apply to your own conduct, using common sense and good judgment. If you have any questions about any of these principles, consult with any member of the management team.

If you violate the law, this Code, or the Company’s policies or procedures, including the Company’s CCP, you will be subject to discipline up to and including immediate termination of employment. A good faith effort to comply with this Code will be taken into consideration when determining disciplinary action. Supervisors who ignore or fail to correct misconduct may also be subject to discipline.

This Code applies to all officers, employees, contract representatives, and agents of Sight Sciences. This Code is not a contract of employment.

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PRINCIPLE 1: BE HONEST AND ETHICAL

Fair Dealing

You must not improperly use business courtesies to gain a competitive advantage. Offering, giving, soliciting or receiving any form of bribe or kickback is strictly prohibited. You must treat customers, suppliers, competitors, fellow employees, and other stakeholders honestly and fairly. Never take unfair advantage of anyone through manipulation, concealment, disclosure of confidential information, or false or misleading statements.

Company Records

All Company books, records and accounts must be accurate and complete, and transactions must be recorded in a timely manner. You are personally responsible for the integrity of the information, reports, and records under your control. You must never make any false or artificial entries for any purpose.

Financial statements must be prepared in accordance with generally accepted accounting principles and must represent, in all material respects, the financial condition and results of the Company.

You must not destroy records that are potentially relevant to a violation of the law, any litigation, or any pending, threatened, or foreseeable government investigation or proceeding. It is a crime to alter, destroy, modify or conceal documentation or other objects that are relevant to a government investigation, or to otherwise obstruct, influence or impede an official proceeding. The law applies equally to all Company records, including formal reports as well as informal data such as e-mail, expense reports and internal memos.

Gifts, Meals and Entertainment

In general, you and your immediate family members may not seek, accept, offer, promise, or give (directly or indirectly) anything of value—including gifts, discounts, favors, entertainment, or services—from or to any person or company with whom the Company does business. This prohibition is intended to prevent the improper use of anything of value (even nominal value) to induce or reward doing business with Sight Sciences. Subject to this general prohibition:

- You may offer meals and items of value to Healthcare Professionals (“HCPs”) in accordance with industry guidelines and Sight Sciences’ written policies on meals and items of value.
- You may offer or accept meals or items of value to or from non-HCPs with whom Sight Sciences does business, as long as these activities are reasonable in cost and frequency.

Conflicts of Interest

You must avoid actual or potential conflicts of interest. A conflict may exist if your activities or interests, or the activities or interests of your family members, make it difficult for you to perform your job objectively and effectively.

You must disclose to Sight Sciences any interest that could influence or be perceived to influence your job activities or decisions. This includes any of the following interests, either of your own or of a family member:

- A substantial financial interest in a Company supplier, competitor, or customer (this does not include ownership of nominal amounts of stock in publicly-traded companies);
- An employment or consulting relationship with a Company supplier, competitor, or customer;
- An interest in a transaction that Sight Sciences is known to be, or may be, interested in;
- An outside business activity that is competitive with Sight Sciences' business;
- A potential to personally profit from Sight Sciences' corporate opportunities; or
- Receipt of fees, commissions, services, or other compensation from a Company supplier, competitor, or customer.

The above list is not exhaustive. Any other actual or potential conflict of interest must be reported. You must report all conflicts to your supervisor. If the Company determines that a conflict exists, it may take any action that it deems appropriate to resolve the conflict.

PRINCIPLE 2: COMPLY WITH THE LAW

Sight Sciences is committed to conducting its business activities in accordance with applicable federal and state laws and regulations. You must have a general understanding of the laws and regulations that apply to Sight Sciences' business activities. Contact a member of the management team if you have any questions about whether certain conduct complies with the law.

Food and Drug Laws

In the United States, the U.S. Food and Drug Administration ("FDA") is the federal agency responsible for overseeing the safety of pharmaceuticals, biologics, medical devices, and other products under the Federal Food, Drug, and Cosmetic Act ("FDCA") and its implementing regulations. FDA regulates almost every aspect of Sight Sciences' business, including the research, development, manufacturing, distribution, marketing, and promotion of our products.

Labeling, Advertising, and Promotion

FDA regulations require drug labeling and promotional material to be accurate, balanced, and truthful. Among other things, FDA regulations require all materials and messaging used to promote our products to be fair and balanced and consistent with FDA-approved labeling. To ensure compliance with FDA regulations, you must comply with all Company policies and procedures related to promotional activities.

Product Safety and Reporting Adverse Events

As required by law, Sight Sciences closely monitors all reports of adverse events associated with the use of the Company's products to ensure that we consistently adhere to the highest levels of safety and accountability. You are required to identify, record, and report any safety, quality, or performance issues, or any circumstance that suggests the occurrence of any of these issues, within 24 hours of becoming aware of the event.

Independent Medical Education Programs

The FDA does not regulate industry-supported scientific and educational activities that are independent of the supporting company's influence. If a company influences a scientific or educational activity, however, then the activity may be considered "promotional" and subject to all FDA regulations on product promotion. When we want to support scientific or educational activities without being subject to FDA regulation, we must ensure that the activities are designed and carried out without any influence from Sight Sciences. You must abide by applicable Company policies and procedures to ensure that our support of scientific and educational activities is appropriate.

Codes of Ethics on Interactions with U.S. Health Care Professionals

In the United States, there are two principal codes of conduct that guide and inform medical device manufacturers' interactions with HCPs: the Medical Device Manufacturers Association ("MDMA") Revised Code of Conduct on Interactions with Healthcare Providers ("MDMA Code") and the Advanced Medical Technology Association ("AdvaMed") Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code" and together with the MDMA Code, the "Industry Guidelines"). The purpose of the Industry Guidelines is to ensure that healthcare decisions are made for the benefit of patients and are not based on undue influence from medical technology companies. They provide examples of proper and improper practices regarding medical technology companies' interactions with HCPs. Compliance with the Industry Guidelines substantially reduces the risk of violating the Anti-Kickback Statute. Medical device manufacturers in the United States, including Sight Sciences, implement and maintain compliance programs that are designed to be consistent with the Industry Guidelines, and your activities must comply with the standards set forth in these guidelines.

Physician Payment Sunshine Act

The Physician Payment Sunshine Act ("Sunshine Act") requires disclosure to the federal government of defined transfers of value to any physicians in the U.S. during the preceding calendar year. It is Sight Sciences' policy to maintain all records necessary to comply with the requirements of the Sunshine Act and with similar state reporting and disclosure laws.

Laws Relating to Government Health Care Programs

Federal Anti-Kickback Statute

The federal Anti-Kickback Statute and certain state laws make it a crime to pay or receive anything of value with the intent to induce the purchase of or prescription of drugs or devices reimbursable under federal or state healthcare programs (*e.g.*, TRICARE, Medicare or Medicaid). The purpose of these laws is to ensure that money, or anything else of value, does not interfere with our customers' independent clinical and formulary decisions. The Anti-Kickback Statute is interpreted broadly and prohibits a wide range of activities, such as:

- Providing an educational or research grant to an HCP with the goal of encouraging the HCP to utilize or recommend a device product;
- Providing certain services to HCPs or other customers on the condition that they purchase a certain amount of device products;
- Providing a grant to a healthcare institution with the goal of influencing the utilization or purchase of a product; and
- Paying an HCP a fee above the reasonable fair market value for services, such as participating in a Company-sponsored advisory board, in order to reward or induce purchases.

Some state laws are broader and apply to all items and services, beyond those reimbursed under a government healthcare program. Sight Sciences treats all HCPs and other customers as if they are subject to the anti-kickback laws, even if they do not participate in government healthcare programs. Sight Sciences and its customers are subject to penalties for violating the anti-kickback laws. The penalties for violations include imprisonment and fines.

The federal Anti-Kickback Statute is so broad that it could be read to prohibit otherwise legitimate marketing activities and even some non-promotional activities. As a result, the U.S. Department of Health and Human Services, Office of Inspector General has defined certain “safe harbors.” Activities that fall entirely within a safe harbor do not violate the Anti-Kickback Statute. A number of safe harbors exist, including the Discount Safe Harbor, the Managed Care Safe Harbor, and the Personal Services Safe Harbor. You must ensure that your activities do not violate the Anti-Kickback Statute and wherever possible are structured to fall within a safe harbor. If you have any questions regarding your activities and the federal Anti-Kickback Statute and safe harbors, you should contact your supervisor.

False Claims Act

The False Claims Act prohibits entities and individuals from submitting, or inducing someone else to submit, a false claim for reimbursement by the federal government. Violating the False Claims Act can result in criminal prosecution and steep fines for each false claim. To avoid violating the False Claims Act, you must ensure that all promotional activities and materials comply with Sight Sciences’ policies and procedures.

State Reporting and Marketing Laws

Some state laws limit or restrict the way medical technology companies interact with HCPs, especially with respect to marketing practices and items of value provided to HCPs. State regulations are designed to ensure that interactions with HCPs benefit patients, and that HCPs use their independent judgment to make decisions about which devices to use with their patients. The recent trend is for state marketing and disclosure laws to place greater restrictions and requirements on companies than the Industry Guidelines or federal laws.

Privacy Laws

In the course of conducting certain aspects of its business, Sight Sciences may collect and process various types of personal information. You may also have incidental or inadvertent contact with a patient’s personal information in the course of your activities with Sight Sciences. Regardless of the source, Sight Sciences safeguards the confidentiality of personal information in accordance with federal and state privacy laws and regulations. The spirit of all privacy laws is that individuals should know when companies are using their personal information, how the personal information is being used, and how the personal information is protected. Personal information may include medical histories or records and personal identifiers such as names, birth dates, and Social Security Numbers.

The most important privacy law that affects the healthcare industry in the U.S. is the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). The HIPAA "Privacy Rule," as it is commonly called, aims to protect the privacy of individually identifiable health information of patients and research subjects. The HIPAA Privacy Rule directly applies to HCPs, health plans, and healthcare clearinghouses and indirectly affects device company operations.

It is your responsibility to comply with federal and state privacy laws, and applicable Company policies and procedures.

Fair Competition Laws and Fair Dealing

Fair competition laws are designed to prohibit activities that reduce market competition and harm consumers. Sight Sciences strives to outperform competition in a fair, honest and legal manner. You must never engage in illegal or unethical business practices. You should never attempt to improperly obtain proprietary information, including trade secret information, from another company. In addition, you should not obtain trade secret information from past or present employees of other companies.

Sight Sciences is committed to conducting all of its business dealings in compliance with applicable antitrust laws. Pursuant to this policy, you may never:

- Collaborate with a competitor or take other actions that have the effect of improperly discouraging competition. If you have any questions about the potential impact of an action or communication, first discuss such questions with a member of the Legal Department;
- Make an agreement or have an informal understanding with competitors, either directly or indirectly, to fix prices, divide customers or territories, or restrict sales;
- Exchange information on pricing, discounting, allowances, royalties, costs, quotas, allocation of customers or territories, contract terms, or other similar proprietary information, with competitors;
- Attempt to monopolize or dominate markets with anything other than the use of superior products, service, or performance;
- Engage in illegal tying (*i.e.*, an agreement to sell one product on the condition that the customer also purchase a different product, or agrees to forego purchasing the product from another supplier), illegal price discrimination, or refusals to deal;
- Enter into agreements with distributors regarding resale prices; or
- Discuss any of these topics with competitors. If a competitor initiates a similar conversation with you, you should politely decline to reciprocate and report the incident to the Legal Department.

You should always be fair in your dealings with clients, customers, suppliers, competitors, and any other third-parties. You may not engage in the practice of manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair-dealing practice.

Export and Trade Laws

The U.S. and other countries have laws that restrict or prohibit even ordinary sales, research, manufacturing, and other commercial relationships with certain countries or parties. Even the simple act of carrying laboratory equipment from the U.S. to a European facility may constitute an export and be subject to applicable trade laws and controls. In addition, disclosing (including oral or visual disclosures) or transferring controlled data to a non-U.S. person, even if the disclosure or transfer occurs within the U.S., would be deemed an export to the home country or countries of the non-U.S. person and could require a license or other authorization. You are encouraged to contact your supervisor when interacting with any person or entity with a presence outside the U.S. to ensure that your actions are in compliance with these trade laws.

Anti-Bribery and Corruption Laws

You must comply with the letter and spirit of the U.S. Foreign Corrupt Practices Act and all other applicable anticorruption statutes. This means that you must not, either directly or indirectly, make any bribes or corrupt payments on behalf of the Company. Bribes not only take the form of money, but also favors, entertainment, promises to pay, and anything else that has value. Violations of anti-corruption laws can subject Sight Sciences and its representatives to criminal and civil penalties.

PRINCIPLE 3: COOPERATE WITH INVESTIGATIONS AND INQUIRIES

Government Requests and Investigations

It is Sight Sciences' policy to cooperate with all government agencies with respect to any request for information or facility visits in connection with a government investigation.

If an employee is contacted by any government agency, he or she should immediately notify his or her supervisor. If an employee is approached in the field (*e.g.*, at a customer's office, or at the employee's home) by an investigator, the employee has the right to obtain legal representation before allowing the investigator to proceed.

If an investigator requests to see Company documents, immediately notify a member of the Legal or Compliance Departments and obtain approval before providing any materials. If the investigator presents a search warrant or a subpoena, the warrant or subpoena should be delivered immediately to a member of the Legal or Compliance Departments or to the Chief Executive Officer, but the employee must not obstruct a search pursuant to a search warrant.

During a facility visit, employees should cooperate fully with inspectors throughout the inspection process, answering any appropriate questions the inspectors may have.

If an employee receives an inquiry, a subpoena, or other legal document regarding Sight Sciences' business, whether at home or in the workplace, from a governmental agency, the Company requests that the employee notify his or her supervisor and a member of the Legal or Compliance Departments immediately. At times, we may be involved in litigation and, because we are in a heavily regulated business, we may be subject to government reviews. As a result, Sight Sciences employees may receive summons, subpoenas and requests for production of documents.

Employees should never provide false or misleading statements to any government official, or fail to disclose or take efforts to conceal any information pertinent to an investigation.

Internal Audits and Investigations

As part of the Company's CCP, from time to time the Company will audit our compliance with internal policies as well as laws and regulations. You must cooperate with all audits and be truthful and accurate when responding to audit requests.

In addition, the Company promptly investigates all reports of misconduct. As with audits, you must cooperate with such investigations and provide truthful and accurate information if you are questioned in the course of an investigation. You must not mislead an investigator, alter or destroy any relevant documents, or otherwise impede or interfere with the investigation in any way.

PRINCIPLE 4: PROTECT OUR RESOURCES AND EMPLOYEES

Confidential Information

You are responsible for safeguarding confidential information. This includes confidential information that belongs to Sight Sciences, its suppliers, its customers, and even fellow employees. Sight Sciences' information, products, services, ideas, and concepts are important proprietary assets for our Company. Various laws enable us to protect these assets. Examples of confidential or proprietary information include marketing plans and strategies, sales and marketing data, customer and employee records, research and technical data, manufacturing techniques, pricing information, information pertaining to business development opportunities, and new products and services.

Help protect Sight Sciences' confidential information by following these principles:

- Be careful when using the telephone, e-mail, fax, and other electronic means of storing and sending information.
- Do not forward confidential or proprietary information to non-Company email accounts.
- Delete any sensitive data that you no longer need to perform your job.
- Do not discuss confidential information in public places where others may overhear.
- Never provide confidential information to outsiders without first getting a written confidentiality agreement and approval from your supervisor.
- Beware of informal telephone or email requests from outsiders seeking information.

In addition, you must not use, disclose to the Company, or induce the Company to use any confidential, proprietary, or trade secret information that belongs to any of your prior employers or any other third party without that party's written consent.

Intellectual Property

Protecting Sight Sciences' intellectual property is essential to maintaining the Company's competitive advantage. Sight Sciences' intellectual property includes its patents, trade secrets, and copyrights, as well as the trademarks, scientific and technical knowledge, know-how, and the experience developed in the course of the Company's activities. You are expected to support the establishment, protection, maintenance, and defense of Sight Sciences' rights in all commercially significant intellectual property and to use those rights in a responsible way.

In addition to protecting the Company's intellectual property rights, you must respect the valid intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose the Company to civil lawsuits and damages. Theft and misappropriation of intellectual property may result in significant fines and criminal penalties for the Company and you.

Company Property and Opportunities

In general, you must not use Company property or services for your own personal benefit. You also must not use opportunities that you discover through your employment with Sight Sciences for your own personal benefit.

Discrimination

Sight Sciences bases employment decisions on business needs, skills, experience, and work performance. We do not discriminate based on race, color, gender, marital status, disability, age, sexual orientation, religion, citizenship, ancestry, nationality, military history, or any other legally protected status.

Harassment

You are required to treat your colleagues with dignity and respect. Harassment of any kind is strictly prohibited. Harassment can take many forms, including unsolicited and unwelcome comments about race, color, gender, marital status, disability, age, sexual orientation, religion, citizenship, ancestry, nationality, military history, or any other legally protected status. You should report any act of harassment to your supervisor or a member of the Human Resources, Legal or Compliance Departments.

Employee Health and Safety

Sight Sciences is committed to protecting the health and safety of its employees. To ensure that employees are kept healthy and safe, you must not only follow all health and safety requirements but must also take personal responsibility for your safety and the safety of those you work with. This includes never reporting to work in a state that could impair your ability to work safely and conscientiously (such as under the influence of drugs or alcohol).

If you are involved in, or know of, an accident or dangerous situation in the workplace, you must report it to your supervisor immediately.

PRINCIPLE 5: COMPLY WITH SIGHT SCIENCES POLICIES AND PROCEDURES

Policies and Procedures

In addition to this Code, the Company has adopted policies and procedures that govern all aspects of our business. Policies provide detailed legal and compliance standards. Procedures set forth specific processes to follow.

While some policies and procedures apply to all Company employees, others are tailored to specific job functions. You must know and comply with all internal policies and procedures that apply to you.

Seeking Guidance

If you are unsure whether particular conduct is consistent with a Company policy or procedure, you should consult your supervisor or a member of the Legal, Compliance or Human Resources Departments before engaging in the conduct.

Reporting Violations

You must immediately report any violations or potential violations of this Code, a law or regulation, or a Company policy or procedure to your supervisor, or to a member of the Legal, Compliance or Human Resources Departments, or **you may confidentially report violations or potential violations by using the Company's reporting hotline, available 24 hours per day at (833) 624-0284 and online at (<http://sightosciences.ethicspoint.com/>)**. You must also cooperate with any investigations of wrongdoing.

You will not be disciplined or retaliated against for making a good faith report of a violation or potential violation, unless it is your own.

CERTIFICATION

I certify that I have received and read the Sight Sciences Code of Business Conduct and Ethics (the ‘Code’). and that I have had an opportunity to ask questions before signing this form. I certify that I will comply with the Code in all respects. I further certify that, to my knowledge, I am not aware of any matters or activities that would constitute a violation of the Code.

I understand that this Code does not change the at-will status of my employment. I further understand that all Company policies and practices, including those reflected in this Code, can be changed at any time (other than with respect to changing my at-will employment status), and that I am responsible for adhering to any such changes once I am notified of them.

Employee Name (Print Name Legibly): _____

Employee Signature: _____

Date: _____, 20