

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

**FORM SD
SPECIALIZED DISCLOSURE REPORT**

Alcon Inc.

(Exact name of the registrant as specified in its charter)

Switzerland

(State or other jurisdiction of
incorporation or organization)

001-31269

(Commission
File Number)

98-0205094

(IRS Employer
Identification No.)

Rue Louis-d'Affry 6, 1701 Fribourg, Switzerland

(Address of principal executive offices)

Royce Bedward

Senior Vice President, General Counsel & Corporate Secretary

Chemin de Blandonnet 8, 1214 Vernier, Geneva, Switzerland

Tel: +41 58 911 20 00

(Name and telephone number, including area code, of the
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

 X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

Section 1. Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934, Alcon Inc. has filed this Specialized Disclosure Form (Form SD) and the associated Conflict Minerals Report. Both reports are posted and publicly available at the Alcon corporate website: <https://www.alcon.com/about-us/responsible-business-practice>.

Item 1.02 Exhibit

The Conflict Minerals Report is attached as Exhibit 1.01.

Section 2. Exhibits

Item 2.01 Exhibits

Exhibit No.	Description
1.01	Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Alcon Inc.

By: /s/ Royce Bedward

Name: Royce Bedward

Title: Authorized Representative

By: /s/ Timothy C. Stonesifer

Name: Timothy C. Stonesifer

Title: Authorized Representative

Date: May 29, 2020

**Conflict Minerals Report of Alcon Inc.
For the Calendar Year Ended December 31, 2019**

Overview

This Conflict Minerals Report for Alcon Inc. and its consolidated subsidiaries covers calendar year 2019 and was prepared in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and Rule 13p-1 under the Securities Exchange Act of 1934 (collectively, the “Rule”). Unless the context requires otherwise, the words “we,” “our,” “us,” “Alcon,” “Company,” and similar words or phrases in this report refer to Alcon Inc. and its consolidated subsidiaries. Our report describes the due diligence undertaken to determine the source and chain of custody, including a Reasonable Country of Origin Inquiry (“RCOI”), of the conflict minerals that were contained in, and necessary to the functionality or production of, the products in our supply chain between January 1 and December 31, 2019. An RCOI is designed to help us determine whether these conflict minerals were sourced from the Democratic Republic of Congo or adjoining countries (the “Covered Countries”) or came from recycled or scrap sources. The conflict minerals covered by the Rule are columbite-tantalite (coltan), cassiterite, wolframite, including their derivatives, which are limited to tin, tantalum, and tungsten, and gold (collectively the “Conflict Minerals”).

Company Background

Prior to April 9, 2019, Alcon had been a division of Novartis AG. As a result of Novartis’ spin-off of Alcon and its consolidated subsidiaries on April 9, 2019, Alcon became an independent, standalone corporation. Alcon’s shares are listed on the SIX and the NYSE under the ticker symbol “ALC”.

Alcon is the largest eye care company in the world, with \$7.4 billion in net sales during the year ended December 31, 2019. We research, develop, manufacture, distribute and sell a full suite of eye care products within two key businesses: Surgical and Vision Care. Based on sales for the year ended December 31, 2019, we are the number one company by global market share in the ophthalmic surgical market and the number two company by global market share in the vision care market. We employ over 20,000 associates from more than 90 nationalities, operating in over 70 countries and serving consumers and patients in over 140 countries.

Our Surgical business is focused on ophthalmic products for cataract surgery, vitreoretinal surgery, refractive laser surgery and glaucoma surgery. Our broad surgical portfolio includes implantables, consumables and surgical equipment required for these procedures and supports the end-to-end needs of the ophthalmic surgeon.

Our Vision Care business comprises daily disposable, reusable and color-enhancing contact lenses and a comprehensive portfolio of ocular health products, including devices and over-the-counter products for dry eye, over-the-counter products for contact lens care and ocular allergies, as well as ocular vitamins and redness relievers.

Products

We conducted a review of all direct materials either necessary to the production of our products or necessary to the products' functionality to determine the risk that Conflict Minerals were present. In accordance with SEC Staff Guidance with respect to the Rule, we excluded packaging materials from this review. Based on the review, the categories of our products that were determined to include or be at risk for containing Conflict Minerals or to include metals of undeterminable content were raw materials associated with Alcon's equipment product lines within its surgical and vision care franchises.

Design of Due Diligence Program

We designed our due diligence measures to conform in all material respects with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas Second Edition (OECD 2012) (the "OECD Framework") and related Supplements.

As a purchaser of components, we are many steps removed from the mining of Conflict Minerals and we do not purchase raw ore or unrefined Conflict Minerals. We must rely on our immediate suppliers to provide information regarding the sourcing of Conflict Minerals. These immediate suppliers are also often many steps removed from the mining of Conflict Minerals.

Our annual due diligence activities, which are in line with the OECD Framework, are summarized below.

Step 1: Establish strong company management systems

- We maintain a Code of Business Conduct, which calls for all third parties with whom we work to comply with the law, to adhere to ethical business practices, and to observe our standard requirements concerning labor, health, safety, environmental protection and management systems. We maintain a Third Party Code of Conduct that establishes a standard for suppliers' support with respect to Conflict Minerals tracking. Specifically, the Third Party Code of Conduct requires that Suppliers help to: identify the source of Conflict Minerals in the products that they sell to Alcon and, as possible through reasonable means, the names of smelters and refiners that process Conflict Minerals and the country of origin of these Conflict Minerals; cooperate with Alcon in our due diligence process and in responding to requests relating to Conflict Minerals in our products; provide reasonable evidence of suppliers' performance of similar due diligence with respect to any of their suppliers or sub-contractors involved in the production of materials or products supplied to Alcon or any components of those materials or products; and work with Alcon to assess opportunities for alternative sources where Conflict Minerals are identified.
- Our Conflict Minerals Core Team ("Core Team") is responsible for the implementation and ongoing management of Conflict Minerals reporting activities, and the documentation and reporting of the results of the Conflict Minerals due diligence activities.
- Annually, we establish and document our process to evaluate our products, in order to identify and assess the presence and sources of Conflict Minerals in the supply chain.
- The Core Team uses standardized documentation to capture key decisions, processes and procedures used in gathering information related to the use of Conflict Minerals in our products, and to the sources of any such Conflict Minerals. We retain such documentation in accordance with our corporate document retention policy.
- In recognition of the OECD Framework requirement, Alcon maintains feedback mechanisms available to all interested parties to provide information or voice their concerns regarding our compliance with laws and regulations.

Step 2: Identify and assess risks in the supply chain

- On an annual basis, we review the suppliers that provide materials used in manufacturing to identify potential sources of Conflict Minerals in our supply chain. The Core Team is responsible for determining the suppliers of materials that are necessary to the production or functionality of products that may

contain one or more Conflict Minerals or contain metal of undeterminable content.

- Suppliers of the items identified as potentially containing Conflict Minerals or metals of undeterminable content are designated as “In Scope” for the RCOI.
- As part of this annual process, we, through a third party vendor, offer Conflict Minerals training for In Scope suppliers and require our suppliers to complete a web-based survey based on the Conflict Minerals Reporting Template version 5.12 (“CMRT”) from the Responsible Minerals Initiative (“RMI”). This survey seeks information regarding country of origin of Conflict Minerals supplied to us and the smelters or refiners in the supply chain.
- To help encourage the highest level of compliance, our third party vendor makes multiple attempts to obtain responses from all In Scope suppliers.
- We review the information provided by each supplier to determine the completeness of each supplier’s responses, and note certain points of information, including whether the supplier has a policy regarding conflict minerals and whether they source any Conflict Minerals from the Covered Countries.
- We review aggregate supplier CMRT responses as well as company statements made by suppliers regarding the status of Conflict Minerals in their supply chain in order to summarize key findings regarding risks in the supply chain. The Core Team meets regularly to review progress.
- We conduct a review of smelter/refinery information provided in the supplier surveys to determine the actual number of unique smelters/refiners identified by our suppliers and whether each has been audited by a third party or presents a “red flag” as defined by the OECD Framework. To make the determination of each smelter/refiner’s conflict status, we rely upon information provided by RMI. RMI conducts an industry-standard Responsible Minerals Assurance Program (“RMAP”), in which it certifies smelters/refiners worldwide by conducting an independent audit to validate company-level management and sourcing processes for responsible mineral procurement. RMI makes available to the public the list of smelters/refiners that it has certified as “Conformant”, which identifies smelters/refiners that are in conformance with the RMAP assessment protocols and that bear the highest level of Conflict Minerals responsible sourcing certification set by RMI.
- Smelters and refiners with the RMI “re-audit in progress” designation are also considered to be RMAP Conformant during the period in which this designation is assigned.
- Smelters and refiners that carry the RMI “Active” designation are in the process of being audited by RMI to determine whether they can be certified as

Conformant. Smelters and refiners are identified as Active in the RMAP once they have submitted a signed Agreement for the Exchange of Confidential Information (AECI), an Auditee Agreement, and a Due Diligence Checklist.

- A smelter or refiner is deemed by RMI as “Known” if it was not Conformant or Active but is listed on the CMRT Smelter Reference List. The status information reflected in this report is current as of April 15, 2020.

Step 3: Design and implement a strategy to respond to identified risks

- We expect supplier conformance with the Conflict Minerals section of the Alcon Third Party Code of Conduct.
- We regularly assess identified risks based on suppliers’ completed surveys. If a high risk is identified, we will determine how to implement necessary risk mitigation efforts, including temporarily suspending trade or disengaging with a supplier.
- As part of our review of compliance activities, we assess our processes in order to determine whether additional actions are required in the future.

Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices

- In accordance with the OECD Framework, we monitor industry actions and the results of independent third-party audits of the due diligence performed by smelters and refiners. Given the nature of our business, the associated costs, and the current lack of transparency in our global supply chain, we are not in a position to conduct our own audits of smelters and refiners; however, we appreciate the efforts of internationally-recognized assessment programs such as RMAP and strongly encourage that each smelter and refinery seek certification from an internationally-recognized assessment program.

Step 5: Report annually on supply chain due diligence

- In accordance with the Rule, we annually summarize the activities and results of our due diligence with regard to Conflict Minerals in this Conflict Minerals Report, which is filed with our Form SD.

Determination

Consistent with the OECD Framework, after our initial determination that Conflict Minerals were necessary to the functionality of some of our products, we conducted a reasonable country of origin inquiry (“RCOI”) to determine whether we had reason

to believe that any Conflict Minerals were contained in, and necessary to the functionality or production of, our products may have originated in the Covered Countries.

In accordance with the Rule, we performed an RCOI based on the procedures set forth above. Based on this process, the results of our RCOI for 2019 were as follows:

- In Scope Suppliers (all were surveyed): 531
- Responses received: 320

As a result of the RCOI process, we concluded in good faith that during 2019 we had reason to believe that certain of the products that we manufactured or contracted to manufacture contained Conflict Minerals that may have originated from Covered Countries. Consequently, we exercised due diligence on the source and chain of custody of the Conflict Minerals following the OECD Framework.

In response to our due diligence activities, certain In Scope suppliers provided us with no information about their smelters and refiners, certain other In Scope suppliers provided only a partial list of their smelters and refiners, and certain other In Scope suppliers provided us with a complete list of their smelters and refiners. As a downstream purchaser of components that contain Conflict Minerals, our due diligence is highly reliant on our suppliers providing accurate information to us. Based on the limited information from our In Scope suppliers that provided us with names of smelters and refiners in their supply chain, we have determined the following information with respect to the facilities used to process Conflict Minerals:

- Unique Smelters/Refiners Identified: 346
- Conformant Smelters/Refiners Identified: 265
- Active Smelters/Refiners Identified: 7
- Known Smelters/Refiners Identified: 74

We further note that not all of the included smelters and refiners may have processed the necessary Conflict Minerals contained in our products. In some cases, suppliers may have reported to us smelters and refiners that were not in our supply chain due to over-inclusiveness in the information received from their respective suppliers, the decision of such suppliers to provide information on a company-wide level rather than a product-based level, or for other reasons.

Because the information that we obtained from In Scope suppliers was incomplete, we were unable to determine the countries of origin of the Conflict Minerals or the facilities used to process them.

Risk Mitigation and Future Due Diligence Measures

We will look to improve our due diligence process by considering measures aimed at increasing Supplier responses to our RCOI in terms of accuracy, timeliness and completeness.