EssilorLuxottica



Business Partners Code of Conduct

2023

Introduction

AN ETHICAL AND RESPONSIBLE APPROACH

EssilorLuxottica's Mission to help people around the world "see more and be more" drives its strategy and everything it does. With its offering, scale and global reach, the Group has a responsibility to lead by example.

As such, we believe that managing our supply chain responsibly entails a collaborative relationship with our Business Partners. This is particularly important as we encourage them to implement the same industry leading ethical, human, social and environmental standards that we apply in our own business activities.

The Company places particular importance on respect for human rights and the environment, along with the applicable laws and regulations (e.g. the United Kingdom "Modern Slavery Act" and the French "Duty of Care" law) and international standards such as the United Nations Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

EssilorLuxottica is committed to respecting and promoting human rights across its entire value chain. The Company abides by the International Labor Organization (ILO) Conventions and the ten principles of the United Nations Global Compact relating to human rights, labor law, the environment and the fight against corruption.

For us, an ethical and responsible approach is an absolute priority and a guiding principle across our operations and entire supply chain.

We expect all of EssilorLuxottica's business partners including suppliers, distributors, franchisees, consultants, agencies, service providers, outsourcing partners, hiring agencies, licensing partners, landlords (all of whom are herein referred to as "Business Partners") to share and respect our ethical standards.

We also expect our suppliers and subcontractors, to the extent possible, to ensure the application of this Code of Conduct or similar ethical standards to their own suppliers and subcontractors, and to take reasonable steps to cascade this Code of Conduct or similar principles to them.

In this document, "EssilorLuxottica" or the "Group" refers to all the entities belonging to the Group, including EssilorLuxottica S.A. and each of its direct and indirect subsidiaries.

This Code of Conduct embeds some of the principles supported by our Group-wide sustainability program "Eyes on the Planet" and its five strategic pillars: Eyes on Carbon, Eyes on Circularity, Eyes on World Sight, Eyes on Inclusion and Eyes on Ethics.

Introduction

OUR EXPECTATIONS

EssilorLuxottica's Business Partners' Code of Conduct sets out our expectations towards our Business Partners in terms of business ethics, labor and human rights, fundamental freedom, health & safety and environment. It applies to all our Business Partners.

This Code of Conduct is without prejudice of applicable contractual agreements with our Business Partners, which will define our Business Partners' commitments in these matters. We reserve the right to incorporate this Code of Conduct in our commercial contracts and in our tenders, as a prerequisite to doing business with EssilorLuxottica.

We expect each of our Business Partners having relationship with the entities of our Group to join us in this approach, as described hereunder, and to:

- Adhere to the principles presented in this Code of Conduct, either through the adhesion to this Code of Conduct or through similar standards contained in their own code of conduct or similar document.
- Comply with its provisions (or the provisions of their own code of conduct or similar document).
- Take reasonable steps to ensure that its suppliers and subcontractors comply with its provisions.
- Commit to cooperating with us in order to apply them in the best way possible.
- Provide EssilorLuxottica with all relevant information regarding the implementation of this Code of Conduct and potential impacts in relation to ethical, human, social and environmental standards that may affect them.
- Accept to be evaluated or audited on these principles by us or by a duly authorized third party.

We also expect them to comply with this Code, provided that when national legislation or other applicable regulations address the same issue as this Business Partners Code of Conduct, the highest standards or most restrictive provisions shall apply.

The Code is regularly reviewed by the Group with relevant stakeholders and may be updated from time to time. The latest version of the Code is made available on EssilorLuxottica's corporate website under the Governance section.

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1

PROTECTING HUMAN RIGHTS

EssilorLuxottica is committed to **respecting and promoting human rights** in all its businesses across its operations and supply chain.

We expect from our business partners that they commit to respect the human and labor rights of their workers and seek to comply with all applicable human rights and labor-related laws and conventions such as the International Bill of Human Rights and the principles on fundamental rights set out in the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization ("ILO"). The principles below apply to our Business Partners across their supply chain.

1.1 Prohibition of forced labor

EssilorLuxottica is committed to combatting **any form of slavery or human trafficking**. We have zero tolerance for forced labor, including unlawful child labor, in our own operations and in our supply chain.

Our Business Partners must **prevent and seek to eliminate** any form of forced or compulsory labor, including child labor, in employment, as defined by ILO instruments, and to require the same from their own contractors and subcontractors.

Our Business Partners must safeguard and prevent infringement of **domestic and migrant workers'** fundamental rights and provide them with fair and decent working conditions. It implies notably not to charge domestic or migrant workers with employment fees, not to abusively retain their identification documents, to provide them with clear and understandable contracts and to grant them freedom to leave employment, subject to reasonable contractual conditions.

Any form of **illegal or undeclared labor** is also strictly prohibited. Business Partners must employ domestic and migrant workers in accordance with applicable labor and immigration laws, including when they are hired or employed through third party agencies.



1.2 Prohibition of child labor

Our Business Partners must not hire individuals (either employees or temporary staff) under the age of 16 or under the legal minimum age for employment in the applicable country or jurisdiction, whichever is higher. In addition, hiring individuals (either domestic or migrant workers, or temporary staff) below 18 years of age for positions involving hazardous work or overnight shift is also strictly prohibited. Business Partners must set up appropriate procedures for age verification.

When hiring trainees or apprentices, our Business Partners must comply with applicable regulations, ensuring that they are not subject to long hours interfering with their education and that their mission corresponds to their skills and qualifications and enables them to achieve the diplomas they are working to attain.



1.3 Fair working conditions - decent working hours

We expect our Business Partners to ensure **fair and decent working conditions** to workers. They must ensure compliance with the maximum number of working hours, overtime, and personal leave (including sick leave, annual leave, parental leave) defined in the applicable local laws and collective bargaining agreements, where applicable. Business Partners should prevent excessive overtime and ensure compliance with local applicable laws. Moreover, Business Partners must ensure that every worker is provided with a minimum of 24 consecutive hours (one day) of rest in a seven-day week. Principles regarding working time, overtime and rest periods should be clearly explained to workers during the recruitment process or upon their request, in a language they understand.

1.4 Fair and equitable wages

We expect our Business Partners to prohibit any practice contrary to labor regulations and in particular concerning remuneration and the right to a living wage.

The wages paid to employees must be **decent and comply with local laws**, including legal minimum standards where applicable and should work towards equal remuneration among genders. Workers should be adequately informed of their wages, provided with clear wage statements that they can read and be paid in full and on time, without unreasonable and unlawful deduction. They should be free to choose how they spend their wages. Contractual bonuses and allowances should be provided. Leave, including parental leave, should be paid, where and as legally required. Workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate.

Employees should also be provided with adequate **social benefits and social security,** in compliance with local laws. All relevant social security contributions should be paid, collected and submitted.

1.5 Protection of local communities

Business Partners should seek to prevent any harm toward local communities, notably by the preservation of cultural heritage and of environment and local biodiversity, by preventing forced evictions and displacement and helping indigenous people and affected communities to safeguard their environments and rights.





2

RESPECTING PEOPLE

2.1 Prohibition of discrimination and harassment

We expect our Business Partners to support our commitments to create an **inclusive work environment** for everyone.

We encourage our Business Partners to support EssilorLuxottica in its promotion of diversity, equity and inclusion at the workplace, and to provide **equal opportunities** and facilitate the integration of people who are under-represented in the workforce, in particular people with disabilities and under-represented social and/or ethnic groups.

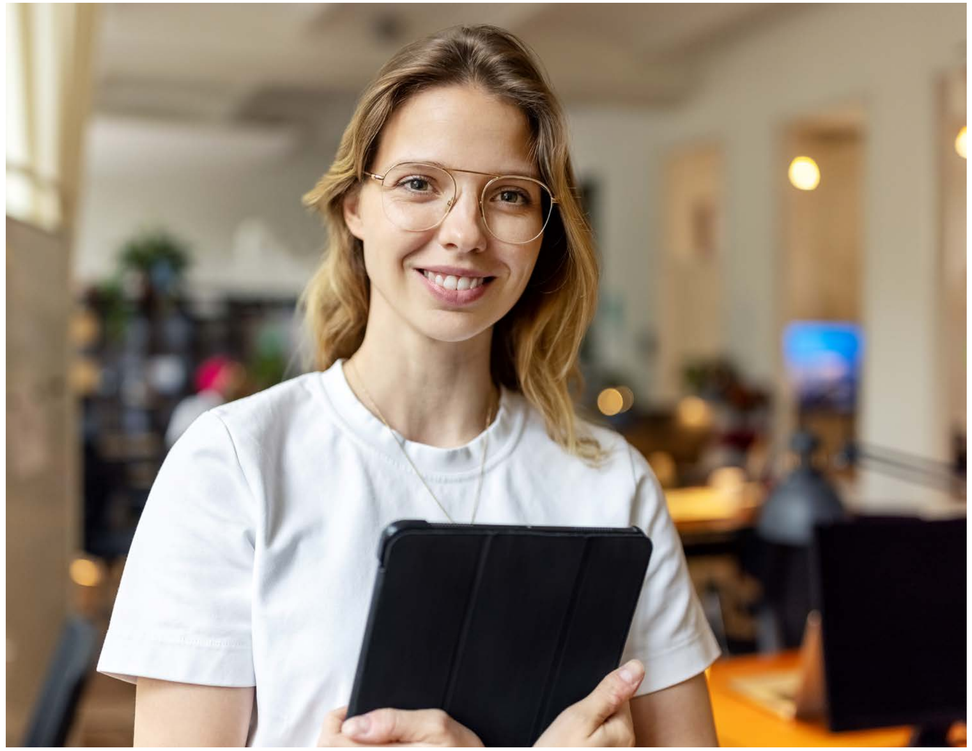
Our Business Partners must prevent and seek to eliminate any form of **intimidation, violence or unfair or abusive disciplinary practices** at the workplace. They must also take appropriate steps, in compliance and to the extent permitted by local laws, to prevent and discipline any form of discrimination or harassment, it being sexual, psychological or on the basis of race, religion, ethnicity, national origin, sex, age, health, disability, sexual orientation, gender identity, marital status, past or present military service, pregnancy, etc., it being one-off, repeated or systematic.

Particular care should be used in high-risk areas or geographies or with populations that are **particularly vulnerable** (including low-income workers, precarious employment, minors authorized to work by local laws at the workplace, etc.).



2.2 Respect of health and safety

EssilorLuxottica considers that all employees, contractors and temporary staff have the right to a safe and healthy work environment, free of risk of violations to their personal integrity (e.g. work related injuries, occupational illnesses). We expect from our Business Partners to work towards the same goals through a clear occupational health and safety policy. We encourage all our Business Partners, including small and medium companies, to recognize the importance of safety as an integral part of their business operation and commit themselves to safe operations, as well as actively seek information on health and safety of their workers.



EssilorLuxottica's Business Partners must ensure the safety of their workers and respect all environmental, health and safety local regulations. They must seek to prevent work-related injuries and occupational illness, notably by:

Providing employees, contractors and temporary staff with safe and healthy working conditions, ensuring they do not endanger their physical / psychological integrity or health;

- Implement health and safety management systems aimed at protecting the health, safety and welfare of employees, contractors, visitors, preventing work-related injuries, health impairment and limiting exposure to safety hazards.
- Providing first aid devices and first aid service.
- Granting at all times access to drinking water and sanitary facilities, which should be adequate and clean, as well as adequate lighting, heating and ventilation systems.
- Preventing the use of drugs and alcohol in the workplace.
- Informing and educating workers in order to prevent accidents and occupational illnesses.
- Taking all adequate steps to prevent, inspect, monitor, mitigate and cease potential harmful situations or dangers for workers.

In the event that Business Partners use **dormitories** for their employees, they must ensure that the rights of their workers to privacy are respected and provide an environment that respects the rules of hygiene. Worker dormitories provided by a Business Partner or any third party should be clean, safe, and provide a reasonable living space.

2.3 Respect of the principles of freedom of association and collective bargaining and safety

EssilorLuxottica's Business Partner should respect the principles of freedom of association and the right to collective bargaining consistent with applicable national laws. They should not interfere nor discriminate because of trade union membership and should comply with applicable national laws in this respect.





3

RESPECTING THE ENVIRONMENT

EssilorLuxottica seeks to work with Business Partners whose operational practices comply with applicable laws and regulations and, more generally, that seek to reduce their impact on the environment, including across their own supply chain. We expect our Business Partners to share our goals notably by:

- Addressing climate change and preserving the environment by reducing energy consumption, water use as well as ensuring waste management and responsible sourcing in their daily operations, limiting carbon footprint across the value chain, and being resilient to climate-related risks.
- Accompanying our efforts to optimize the use of resources to lower our product environmental footprint across our supply chain, including a shift from fossil-based materials to bio-based materials and the adoption of eco-design criteria in our product developments.
- Implementing and/or pursuing initiatives that contribute to the decrease of environmental impacts by responsibly managing natural resources, protecting local biodiversity and natural ecosystems and preventing pollution and deforestation.
- In all cases, only using packaging materials that comply with applicable environmental regulations.

We expect our Business Partners to comply with all applicable regulations concerning environmental performance in order to conduct their activities sustainably, and obtain all necessary permits, licenses, registrations and implement all required reporting and operational systems and processes.





4

CONDUCTING BUSINESS ETHICALLY

EssilorLuxottica strives for the utmost integrity, **honesty and transparency**. Unethical behaviors from our Business Partners may damage our business reputation and our brands, as well as licensed brands. As such, we expect our Business Partners to support us in our ethical commitment and to conduct their business with high ethical standards, in compliance with the applicable laws.

4.1 Prohibition of bribery and corruption

EssilorLuxottica has a **zero-tolerance policy** for any form of bribery, corruption and influence peddling, including across its supply chain. Our Business Partners are forbidden to solicit, accept, offer, promise, pay, permit, or authorize, directly or indirectly to a Public Official or a member of their family or any private person:

(a) bribes, facilitation payments (or "grease payments"), kickbacks or illegal political contributions,
(b) gifts, donations, money, goods, services, entertainment, employment, contracts or other things of value, or
(c) any other advantage, unlawful or improper payments or benefits,
in order to obtain or retain improper advantage or to commit any act of their function.

Our Business Partners, **including brokers and intermediaries or distributors**, are also forbidden to use, directly or indirectly, any part of the payments of EssilorLuxottica relating to a project for any bribe to any private person or to any Public Official in order to obtain or retain any direct business or any improper advantage.

A Public Official is any officer, agent, or employee or any person acting for or on behalf of: (a) a government, including any legislative, administrative, or judiciary branch of such government; (b) a department, agency, or instrumentality of a government, including wholly or majority state-owned or controlled enterprises; (c) a public international organization, such as the United Nations or World Health Organization; (d) a political party (including the political party itself); or (e) a person holding or candidate for political office.

We also prohibit Business Partners to offer or receive cash or cash equivalents or improper or unreasonable gift or hospitality to our employees. Gifts and invitations can be further accepted only if they are of a reasonable value and nature with respect to the circumstances and the person who offers or receives them and allowed by applicable laws and by EssilorLuxottica's policies.

Furthermore, we strictly forbid our Business Partners from committing any act of influence peddling which consists in illicitly using their influence in order to a obtain any advantages (administrative decision, certifications, tenders, contracts, etc.) from a Public Official in exchange for any benefit. Business Partners shall always comply with public procurement regulations.
We expect Business Partners to conduct reasonable due diligence to prevent and detect bribery, corruption and influence peddling in all business arrangements.

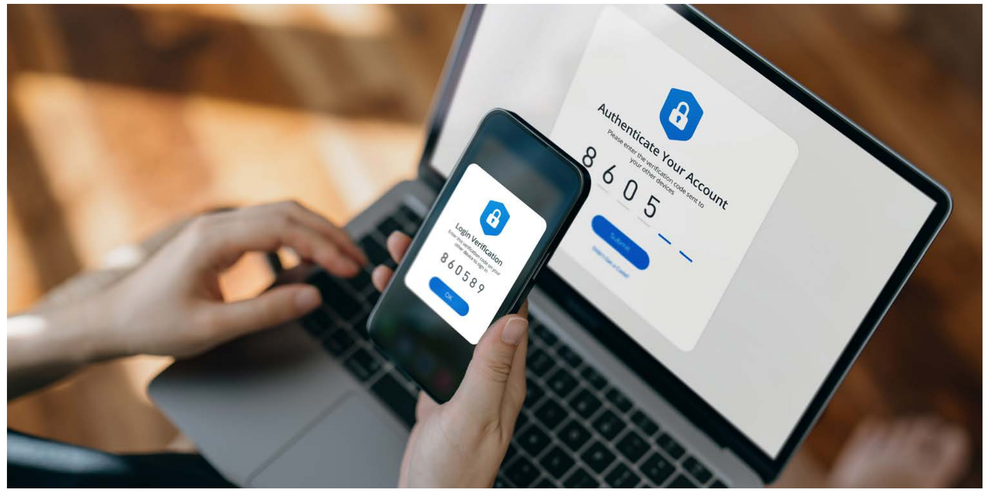


4.2 Prevention of conflicts of interest

EssilorLuxottica's Business Partners must seek to prevent and resolve any form of conflict of interest, potential or actual, between themselves (or their shareholders, officers, directors, employees or relatives) and EssilorLuxottica or any Public Official or any private person, directly or indirectly involved in any project related to EssilorLuxottica. Any situation of potential or actual conflict of interest must be **declared in writing** to EssilorLuxottica at the earliest, and whenever possible, before the starting or renewal of the business relationship.

4.3 Prevention of competition law

EssilorLuxottica strictly abides by competition laws. We expect our Business Partners to conduct their activities in accordance with fair competition, not engaging in abuse of dominant position or illegal concerted practices, especially but not limited to no collusion with competitors, including sensitive information sharing, **no price fixing and no rigging bids**.



4.4 Prevention of intellectual property

Intellectual Property is an extremely important topic for EssilorLuxottica. Our rich portfolio of eyecare and eyewear trademarks, patents, designs, know-how and technologies are one of the foundations of EssilorLuxottica's business. Prestigious licensed brands are also part of the EssilorLuxottica family and we have no tolerance for any form of counterfeiting. We expect our Business Partners to ensure that their activities **do not jeopardize our intellectual property and innovation**, to take all appropriate steps to **prevent and fight counterfeiting** both in the supply of parts, materials and in the distribution of our products.

4.5 Prevention of personal data and privacy

In a growing digital and global environment, protecting the privacy and personal data of all relevant stakeholders is a key priority for EssilorLuxottica.

EssilorLuxottica complies with all applicable laws and regulations concerning the protection of personal data with regards to its employees, customers and Business Partners.

We expect our Business Partners to comply with applicable data protection regulations and to have adequate technical and organizational measures in place to **protect the confidentiality and security of personal data**, especially when they host, process or access our personal data (or the personal data of our customers), including when they use subcontractors. The conditions of processing of such personal data must be set out in appropriate personal data protection clauses or agreements.

Franchisees must implement appropriate personal data protection compliance programs.

4.6 Protection of confidential information - cybersecurity

Our Business Partners must **protect EssilorLuxottica's information and confidential information**, in accordance with contractual provisions applicable to them. They must implement adequate information technology ensuring **security, confidentiality, integrity and availability of data** in all their dealings with EssilorLuxottica. **Franchisees** must implement robust information security.

4.7 Respect of trade compliance

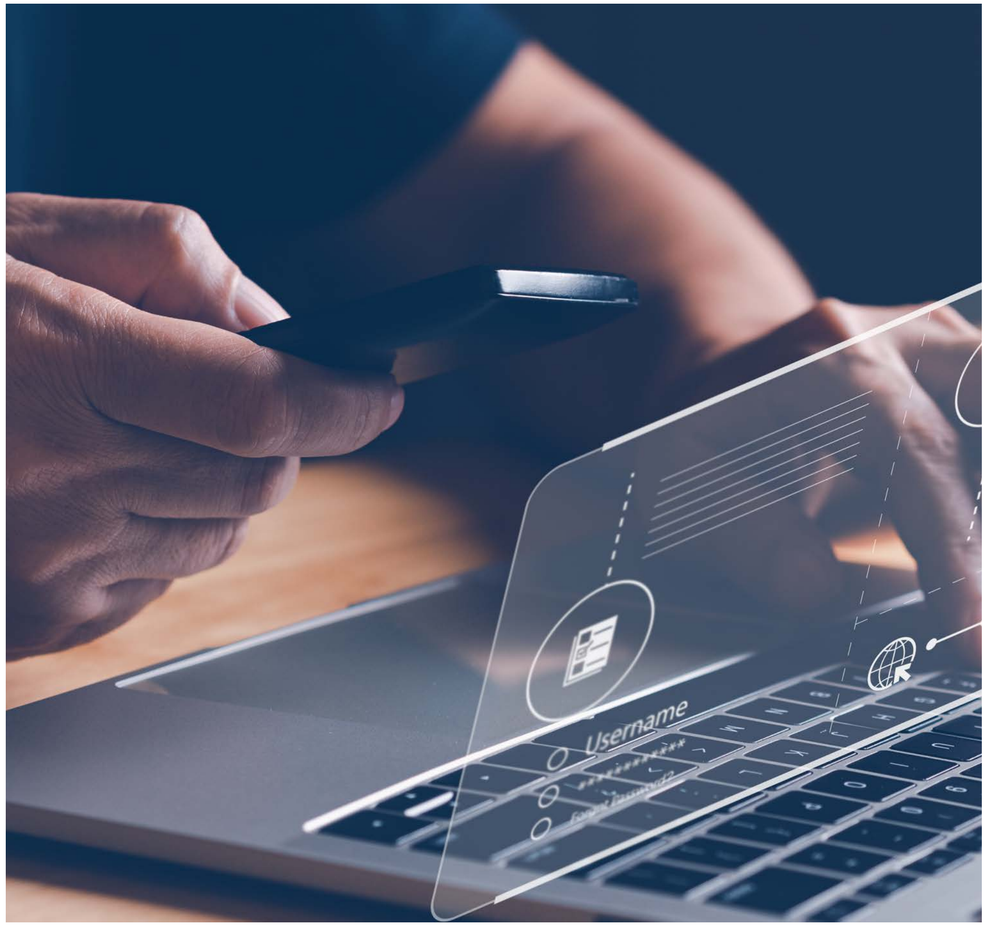
We expect our Business Partners to implement adequate measures to **prevent money-laundering and terrorism financing** and prevent their activities to be used for money-laundering purposes. Business Partners must **also comply with applicable international economic sanctions, customs and export control regulations**. They must comply with applicable custom clearance procedures and secure the necessary export licenses, where necessary, and provide EssilorLuxottica with any export-related documentation.

EssilorLuxottica expects its suppliers to comply with applicable regulations about **conflict minerals** (tin, tantalum, tungsten or gold) as defined by EU or US regulations and to conduct appropriate due diligence to ensure that their products do not contain conflict minerals and to provide supporting data on their sources and supply chain of custody for these minerals, upon reasonable request. In the event that the material "chain of custody" supplied is "indeterminable" or otherwise unknown, the supplier is expected to either attain the appropriate certifications or phase out that material.

EssilorLuxottica reserves the right to request information about its Business Partners and their beneficial owners in order to conduct **due diligence and background checks**, as well as the delivery of all assistance, information or certificates, including, technical information sufficient to determine compliance with applicable trade regulations.

4.8 Prohibition of insider trading

Business Partners must refrain from selling or buying EssilorLuxottica's shares or securities based on inside information, either directly or indirectly.





5

DUE DILIGENCE

Our Business Partners should conduct **risk-based due diligence** in their own operations and supply chain, including hiring agencies, to prevent, monitor and mitigate risks related to human rights and environmental adverse impacts. They are expected to provide adequate education and training to their employees and subcontractors in order to prevent and eliminate human rights risks in their supply chain.



6

COMMERCIAL REFERENCE

Business Partners cannot refer to EssilorLuxottica as a commercial reference without obtaining our written approval, in advance of publication.

Any use of our brands or logos by our Business Partners is subject to EssilorLuxottica's written approval, in advance of publication or in line with contractual provisions.



7

AUDITING AND REMEDIATING SUSPECTED VIOLATIONS

EssilorLuxottica expects its Business Partners to implement adequate internal procedures and controls, and to maintain accurate books and records.

EssilorLuxottica conducts risk-based due diligence and background checks on its Business Partners and may also submit them to self-assessment questionnaire and/or sustainability audits and on-site inspections, directly or by third parties, in order to verify the adequacy of their business with the principles mentioned in this Code of Conduct. We may also require our Business Partners to be **rated on rating platforms by third parties**.

We expect our Business Partners to **identify risks across their supply chain** and to remediate gaps or violations of laws.

Suspected violations of this Code of Conduct, whether revealed during an audit by EssilorLuxottica or a risk assessment exercise by a Business Partner, should be **promptly notified** to EssilorLuxottica by the Business Partner, along with an assessment of the risks and a description of the remediation plan and related timeline.

EssilorLuxottica may take appropriate measures in case of potential or actual violations of this Code of Conduct, including the right to require remediation or improvement plans, up and including termination of the contractual relationship with the Business Partners.





8

REPORTING VIOLATIONS

Business Partners are encouraged to implement internal reporting systems enabling their employees and contractors to report anonymously, confidentially and without fear of retaliation, suspected or actual violations of this Code of Conduct.

Business Partners' employees may also use EssilorLuxottica's Internal Reporting system: EssilorLuxottica SpeakUp. They can report suspected or actual violations of this Code of Conduct anonymously and confidentially. EssilorLuxottica applies a strict non-retaliation policy.

- Through our online hotline available in several languages, accessible from a computer or mobile phone, at the following address: https://speakup.essilorluxottica.com/
- Through mobile phone (scan the QR code):
- By email: compliance@essilorluxottica.com

Contact

Contact: compliance@essilorluxottica.com

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Société Anonyme with a share capital of 81,650,243.70 Euros
Créteil Trade and Company Registry No. 712 049 618
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