EssilorLuxottica

INFORMATION SECURITY POLICY

EssilorLuxottica defines the Group policy on Information Security in compliance with the ISO/IEC 27001:2022 standard. The Information Security Management System (ISMS) is implemented to ensure the protection of information assets and support the principles of confidentiality, integrity, and availability across all processes, systems, and services provided to its clients.

While EssilorLuxottica defines the Group-wide Information Security Policy and provides the overarching governance, tools, and procedures, EyeMed Vision Care Europe is responsible for ensuring the local application and enforcement of these directives in line with its operational context and regulatory environment.

Information Security measures are designed to prevent unauthorized use, access, disclosure, alteration, or destruction of data. The ISMS is established through a structured risk analysis approach to ensure the protection of the Company's information, client data, and information relevant to interested parties.

EssilorLuxottica ensures appropriate resources, including personnel, systems, and infrastructure, are in place to support information security throughout the data lifecycle. The Company also performs continuous improvement of its security posture in alignment with business needs and legal or contractual obligations.

A consistent application of the Group's ethical and governance principles is considered essential to maintaining information security and protecting corporate assets.

MANAGEMENT DUTIES - OBJECTIVES

EssilorLuxottica has established and maintains an Information Security Management System in compliance with ISO/IEC 27001:2022. Its objectives are as follows:

- ✓ In accordance with the principles of confidentiality, integrity and availability, protection of the Company know-how, including its own information and clients' information, obtained, collected, received or produced throughout the projects and services carried out.
- ✓ Appropriate access limitation to ensure protection from unauthorised activity by EssilorLuxottica personnel, staff or by its general partners.
- ✓ Information security measures to protect its own and clients' information and personal data against breach, misuse, and fraud.
- ✓ Definition of both internal and external roles and responsibilities for information security and data protection.
- ✓ Provision of information security and data protection training and courses to EssilorLuxottica personnel and staff to increase knowledge about information security, privacy and risk minimisation.
- ✓ Continuity of information security and data in the event of a threat or adverse scenario.
- ✓ Compliance with the ISO/IEC 27001:2022 standards.
- ✓ Adherence to contractual agreements, law and regulations on information security.

EssilorLuxottica management defines, disseminates, and maintains Information Security Policies at all levels within its organization:

- ✓ The Policies outline any change that may impact the Company's approach to information security management, including organizational changes, technical environment, availability of needed resources, legal, regulatory requirements, agreements, contractual obligations, reviews and audit outcomes.
- ✓ The Policies are kept up to date in compliance with applicable law, context and business requirements in accordance with the principles of continuous improvement of the Management System.
- ✓ The Policies track technological changes of information systems over time, including systems available to staff, central IT systems or cloud solutions.

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IMPLEMENTATION OF THE ISMS

Company's Top leadership shares the principles and the objectives of the ISMS and fully supports its implementation and maintenance.

In this context, EssilorLuxottica acts as the corporate authority defining the security policy framework, while EyeMed Vision Care Europe is responsible for embedding and maintaining the ISMS within its organization. This includes ensuring that all personnel and third parties operating within its scope are aligned with the Group's information security and privacy requirements.

Company's Top leadership approves the policy and ensures that the Company issues, communicates and makes it available to all interested parties as needed. The present information security policy constitutes a programmatic document of reference for all the other ISMS documents.

The ISMS include the policies and procedures implemented for the achievement of Information Security objectives. The ISMS scope comprise all activities and processes needed to provide operational, administrative and support activities.

All employees, collaborators, providers, contractors, partners and third parties, that process EssilorLuxottica Group's information or EssilorLuxottica Group's client information, are required to adhere to the present information security and personal data protection policy. Managers in EssilorLuxottica are directly responsible for the policy implementation and adherence to it by the above parties.

EssilorLuxottica has drawn up, approved, published, and shared its policy and suitable internal documentation regarding Information Security with employees and interested parties.

The present policy is made available on the Company's official website. In accordance with the classification rules, relevant documents of the ISMS may be shared with third parties and made available upon request.

This policy is periodically reviewed and/or it is reviewed in the event of significant changes with possible impact on information security to ensure appropriateness, adequacy, effectiveness and adherence to law and standards.

21/05/2025

Stefano Orsini

Group Risk, AP & Info Security
EssilorLuxottica

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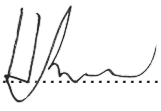
Hector Rincon

Head of EyeMed International



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